

Prescribed Product Disclosures

January 1, 2011 – December 31, 2011

Report of

Vermont Attorney General

William H. Sorrell

October 2012

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Prescribed Product Disclosures:

Report of Vermont Attorney General William H. Sorrell for Calendar Year 2011

October 2012

I. Summary

This is the tenth report of Vermont Attorney General William H. Sorrell on Prescribed Product Disclosures. It is based upon disclosures of activity engaged in during the period of January 1, 2011, through December 31, 2011¹ by manufacturers of pharmaceutical, biologic (e.g., vaccines) and medical device products (e.g., artificial hip, upper extremity prosthesis, hearing aid, contact lenses, scopes). Vermont's Prescribed Product Disclosure Law, 18 V.S.A. §§ 4631a, 4632, requires the Vermont Attorney General to issue a report about the disclosures by October 1, 2012.²

This report reflects for the first time some amendments made to Vermont's law in 2009 and 2011. Most notably, the report reflects the 2009 amendment requiring manufacturers to disclose information regarding the distribution of samples of prescribed products to health care providers in addition to expenditures and gifts (hereinafter, expenditures and gifts are referred to collectively as "expenditures"). The report also reflects less substantial changes to the law made in 2011. Finally, the report partially reflects the 2011 change requiring manufacturers to report information about the distribution of over-the-counter product; this change will be fully reflected in future reports.³

Samples disclosures may only be reported to the public in aggregate form. Thus, while expenditure disclosures have been posted along with this report on the Attorney General's Website: www.atg.state.vt.us, samples disclosures have not.

As always, changes in the law complicate the comparison of data from year to year. However, the amendments evident for the first time in this report – namely, the requirement that

¹ This report reflects a transition from reporting by fiscal year to reporting by calendar year, which is the schedule for reporting to the federal government under the Physician Payments Sunshine Provision (§ 6002) of the Patient Protection and Affordable Care Act (Pub. L. No. 11-148). For expenditures and gifts, this time period corresponds with the last six months of the FY11 reporting period (January 1, 2011 through June 30, 2011), and the entire six-month 2011 reporting period (July 1, 2011 – December 31, 2011). The Attorney General chose to report on a twelve month period of expenditure and gift disclosures, notwithstanding the truncated 2011 reporting period, in order to facilitate comparison with prior, and future, reporting years.

² The information that forms the basis of this report comes solely from the disclosures of prescribed product manufacturers; the recipients of the disclosed gifts, expenditures, and samples have not had the opportunity to review the disclosures or confirm their accuracy. Moreover, by publishing the disclosures, the Attorney General makes no representation as to their accuracy or the legality of the underlying conduct.

³ This report does not reflect the full extent of the statutory amendment requiring reporting as to the distribution of over-the-counter product because, while some manufacturers voluntarily included this information in their disclosures corresponding to the six-month 2011 reporting period, the amendment did not go into effect until January 1, 2012.

manufacturers disclose information about the distribution of samples and over-the-counter product – have been accounted for in the summary below, and in the accompanying tables, to the extent possible. Note that because manufacturers are not required to disclose the dollar value of samples, dollar values continue to reflect expenditures only. Samples are reported only by quantity.

Manufacturers, Expenditures and Samples

According to the disclosures corresponding to the activity that took place in calendar year 2011, 211 manufacturers reported spending approximately 7.5 million dollars and distributing nearly 106,000 samples to Vermont health care providers, institutions and organizations.⁴ Only 17 manufacturers had expenditures greater than \$100,000, and 159 manufacturers had either expenditures of less than \$20,000 or no expenditures at all. Only 10 manufacturers distributed 3,000 or more samples, and 115 manufacturers disclosed no sample activity at all. Exhibits 1a and 1b.

Expenditures on pharmaceutical products accounted for more than 5.1 million dollars of the 7.5 million dollar expenditure total, and were made by 77 manufacturers. Thus, 36% of the manufacturers accounted for more than 68% of expenditures. Exhibits 3 and 4.

As in years past, expenditures for pharmaceuticals dominated the percent of total dollars reported (73.5% as compared with 20.2% for medical devices and 4.4% for biologic products). However, for the second reporting period in a row, more than half of the total number of expenditures were for medical devices (54.7% as compared with 31.5% for pharmaceuticals and 3.7% for biologic products). Exhibit 2.

Pharmaceuticals also dominated the percent of the total number of samples distributed (62.6% as compared with 36.9% for medical devices and approximately .1% for biologic products). Exhibit 2.

The 2011 pharmaceutical expenditure total of more than 5.1 million dollars may appear to exceed even the highest annual level of spending reported in FY04. However, excluding payments made on clinical trials and research, which were not reported until FY10, puts 2011 expenditures at approximately 3 million dollars, a figure roughly in the middle of prior reported levels of pharmaceutical marketing expenditures, which ranged from approximately 1.8 million dollars in FY10 to roughly 4 million dollars in FY04. Exhibit 3.

Of the 211 disclosing manufacturers, 104 reported expenditures of exclusively medical devices and biologics, and 30 reported only sample distribution. The number of manufacturers reporting only expenditures rose from 154 in FY11 to 181 in 2011. Exhibit 4.

The number of manufacturers reporting pharmaceutical expenditures for 2011 (77) rose again from the level reported in FY11 (64), as did the number of manufacturers that reported expenditures related exclusively to non-pharmaceutical products (104 in 2011 as compared with 90 in FY11) and the total number of manufacturers reporting expenditures (181 in 2011 as compared with 154 in FY11). The total number of expenditures also rose from 4,277 in FY11 to

⁴ In 2011, 181 manufacturers reported having made \$7,503,191.70 in expenditures to 879 recipients, and 96 manufacturers reported having distributed 105,838 samples to 1,796 recipients.

6,179 in 2011. However, the 6,179 figure represents a 61% decrease from a high of 15,880 expenditures in FY08, and constitutes only about 6% of the incidence of expenditures and samples combined. In other words, roughly 94% of all reports were for samples. Exhibits 4 and 5.

Pfizer was the only manufacturer among both the five manufacturers with the highest total expenditures and the five manufacturers with the highest sample distribution during 2011; Pfizer had the second highest expenditure total, and the fourth highest sample total. The five manufacturers with the highest total expenditures during 2011 were: (1) Aptalis, (2) Pfizer, (3) Novartis Pharmaceuticals, (4) Abbott Laboratories, and (5) Medtronic. Of these, all but Aptalis have been among the top five manufacturers by expenditure in at least one of the other two reporting years in which medical device and biologic expenditures were reported (FY10 and FY11). The five manufacturers with the highest sample distribution during 2011 were: (1) CIBA Vision, (2) Cooper Vision, (3) GlaxoSmithKline, (4) Pfizer, and (5) Vistakon. Exhibit 6.

The percentage of samples reported by the top five manufacturers by samples distribution, as compared with the total number of samples reported, was 44%. Similarly, the five manufacturers with the greatest amount of expenditures account for 45% of total expenditures in 2011 as compared with 39% in FY11. This represents a return to levels reported in FY09 and FY10; in FY09 and FY10, the top five manufacturers were responsible for 47% of total expenditures, a decrease from prior levels of 52% (FY08) and 56% (FY07). Exhibit 6.

Recipients

Approximately 38% of the expenditures made in 2011, or 2.8 million dollars, went to clinical trials and research. Of the balance, recipients of the highest percentage of expenditures in 2011 were professional, educational, or patient organizations, as well as doctors (17% each), recipients in the aggregate⁵ (15%) and academic institutions (7%). Exhibit 7.

Roughly 69% of samples distributed in 2011 went to doctors. Of the balance, recipients of the highest percentage of samples distributed in 2011 were reported as having been received by optical practices (14%), as well as other prescribers and other health care providers (6% each). Exhibit 7.

Excluding expenditures made in connection with clinical trials, the number of health care providers receiving \$3,000 or more rose again from 56 in FY11 to 65 in 2011. This represents a total increase from the corresponding FY10 figure (44) of approximately 48%. In contrast, the total dollars received by this group held steady as compared with FY11 at roughly 1.3 million dollars, a 76% increase from the FY10 total of roughly \$760,000. A total of 52 health care providers received 250 or more samples in 2011. Exhibits 8a and 8b.

The greatest amount of expenditures to the 65 health care providers who received \$3,000 or more in 2011 went to neurologists, for a total of over \$186,000. In addition to this group, health care providers who received \$3,000 or more individually and over \$50,000 as a group were doctors identifying their specialties as cardiac electrophysiology, internal medicine, orthopaedic

⁵ The Attorney General's Office allows manufacturers to elect to report permitted gifts with a fair market value below \$25 as having gone to all Vermont health care providers and institutions in the aggregate. The overwhelming majority of aggregate spending is related to educational materials.

surgery, diagnostic radiology, cardiovascular disease, hematology and pain management, and advance practice registered nurses. The greatest amount of samples to the 52 health care providers who received 250 or more samples went to optometrists. In addition to this group, health care providers who received 250 or more samples individually were doctors identifying their specialties as internal medicine, family practice, critical care medicine, endocrinology, diabetes and metabolism, and cardiovascular disease, as well as physician assistants and advanced practice registered nurses. Exhibits 8a and 8b.

Excluding expenditures associated with clinical trials, the largest amount of expenditures associated with any single individual recipient in 2011 was approximately \$143,000 to a neurologist, roughly half of which was for faculty compensation and expenses. The total expenditures for that individual are roughly even with the total received by the recipient with the highest expenditures in FY11 (approximately \$149,000 to a radiologist). Four optometrists received the largest amounts of samples associated with individual recipients in 2011, with total samples received ranging from over 1,100 to over 9,700 samples each. For each recipient, those samples overwhelmingly included medical device products such as contact lenses. Exhibits 9a and 9b.⁶

Products

Fifty products were associated with over \$40,000 each in expenditures in 2011. Of those, 33 (66%) were pharmaceutical products, 12 (24%) were medical devices, and 5 (10%) were biologics. The top ten products by expenditure for 2011 were all pharmaceutical, and accounted for approximately 5.2 million dollars in spending (including expenditures for clinical trials), or approximately 37% of overall spending. The top ten products by expenditure total for 2011, and their manufacturers and indications, were as follows:

<u>Rank</u>	<u>Product</u>	<u>Manufacturer</u>	<u>Indication</u>
1.	Zenpep	Aptalis	Exocrine Pancreatic Insufficiency
2.	Pylera	Aptalis	H. Pylori Infection
3.	Canasa	Aptalis	Active Ulcerative Proctitis
4.	Humira	Abbot Laboratories	Rheumatoid Arthritis
5.	Tricor	Abbot Laboratories	Hypercholestrolemia
6.	Depakote	Abbot Laboratories	Bipolar Disorder
7.	Kaletra	Abbot Laboratories	HIV
8.	Ultane	Abbot Laboratories	General Anesthesia
9.	Gilenya	Novartis	Multiple Sclerosis
10.	Tekturna	Novartis	Hypertension

Exhibits 2 and 10a.

Fifty products were associated with the distribution of over 630 samples each. Of those, 32 (64%) were pharmaceutical products and 18 (36%) were medical devices. No biologic products were sampled more than 630 times. The top ten products by sample totals for 2011 accounted

⁶ Vermont’s Prescribed Product Gift Ban and Disclosure Law requires the Attorney General to include in his annual report “the amounts expended on the Green Mountain Care board.” 18 V.S.A. § 4632(a)(5)(A). No expenditures were disclosed as having been received by any member of the board in 2011.

for approximately 26,000 samples, or 20% of overall samples distributed in 2011. The top ten products by total number of samples distributed in 2011, and their manufacturers, product types and indications, were as follows:

<u>Rank</u>	<u>Product</u>	<u>Manufacturer</u>	<u>Product Type</u>	<u>Indication</u>
1.	Advair	GlaxoSmithKline	Pharmaceutical	Asthma
2.	Abilify	Otsuka & Bristol-Myers Squibb	Pharmaceutical	Antipsychotic
3.	Lipitor	Pfizer	Pharmaceutical	Myocardial Infarction
4.	Air Optix for Astigmatism	CIBA Vision	Medical Device	Vision Correction
5.	Air Optix Aqua Multifocal	CIBA Vision	Medical Device	Vision Correction
6.	Biofinity EW	Cooper Vision	Medical Device	Vision Correction
7.	Acuvue Oasys for Astigmatism	Vistakon	Medical Device	Vision Correction
8.	Purevision Toric	Bausch & Lomb	Medical Device	Vision Correction
9.	Air Optix Aqua	CIBA Vision	Medical Device	Vision Correction
9.	Proclear Toric	Cooper Vision	Medical Device	Vision Correction

Exhibits 2 and 10b.

Only two products were among the top 50 products by both expenditures and samples: Vytorin, a pharmaceutical used for the treatment of hyperlipidemia manufactured by Merck (ranked #23 in expenditures and #50 in samples), and Singulair, a pharmaceutical used for the treatment of asthma manufactured by Merck (ranked #37 in expenditures and #32 in samples).

Exhibits 10a and 10b.

Looking only at the 50 products with the greatest expenditures, including expenditures on clinical trials and research, the most prevalent indication was Exocrine Pancreatic Insufficiency, which was associated with more than \$804,000 in expenditures, closely followed by expenditures for indications of Active Ulcerative Proctitis and H. Pylori Infection, both at over \$802,000. Expenditures for products with the fourth and fifth most prevalent indications in 2011 were: Type 2 or Types 1 and 2 Diabetes, and Rheumatoid Arthritis. Of all five, only Diabetes and Rheumatoid Arthritis were among the top five indications in FY11; Exocrine Pancreatic Insufficiency, Active Ulcerative Proctitis, and H. Pylori Infection were not among the primary indications of the top 50 products in any of the reporting years from FY08-FY11. Exhibit 11a.

Looking only at the 50 products with the greatest number of samples, the most prevalent indication by far was vision correction, an indication associated with nearly 28,000 samples, approximately 42% of all samples associated with the top 50 products by sample, and nearly 22% of samples overall. Samples for products with the second through fifth most prevalent indications in 2011 were: Asthma, Antipsychotic, Myocardial Infarction (Preventative), and Nutrition. Exhibit 11b.

Five indications were among the primary indications of both the top 50 products by expenditure and sample: Type 2 or Types 1 and 2 Diabetes (ranked #4 in expenditures and #11 in samples), Bipolar Disorder and/or Schizophrenia (ranked #7 in expenditures and #12 in samples), Hyperlipidemia (ranked #14 in expenditures and #24 in samples), Unknown (ranked #22 in expenditures and #10 in samples), and Asthma (ranked #27 in expenditures and #2 in samples). Exhibits 11a and 11b.

Nature and Purpose of Expenditures

Approximately 81% of all expenditures in 2011 were in the form of cash or check to recipients, a slightly smaller proportion than was reported in FY11 (85%). Approximately 1.1 million dollars of 2011 expenditures took the form of educational materials, a 64% increase from the FY11 level of roughly \$676,000, and a 107% increase from the FY10 level of roughly \$535,000. However, over the same period, as a proportion of total expenditures, educational materials rose only from 11% in FY10 to 15% in 2011. In 2011, manufacturers loaned 170 medical devices to 32 recipients (up from 113 devices to 18 recipients in FY11). Per Office guidance, no value is placed on the loan of medical devices. Exhibit 12.

Manufacturers reported that the purpose of roughly 2.5 million dollars (or 33%) of 2011 spending was for clinical trials. Manufacturers also reported spending approximately 1.1 million dollars on educational materials (15%), and more than \$500,000 each on gifts to institutions and organizations (12%), and for other fair market value payments (11%). Exhibit 13.

Clinical Trial Expenditures

Manufacturers reported that the 2.5 million dollars spent on clinical trials were associated with 400 separate expenditures to 40 recipients. This dollar total is roughly a 42% increase from the FY11 clinical trial total of 1.7 million dollars. In addition, manufacturers disclosed that they funded 45 additional clinical trials in Vermont during the last half of 2011; under the delayed disclosure scheme laid out in the statute, manufacturers will disclose the details of those clinical trial expenditures at a future date.⁷ Exhibits 13, 14a and 14b.

Samples

Of the approximately 106,000 samples distributed in 2011, more than 89,000 (84%) contained product, roughly 14,000 (13%) contained vouchers or coupons for free or reduced price product, and approximately 10,000 (10%) contained other items, such as educational materials, non-prescribed items and cases/holders. Approximately 5,600 (5%) samples included two or more kinds of items (product, vouchers or other), while about 2,300 (2%) contained all three kinds of items. Exhibit 15.

II. Description of Vermont's Prescribed Product Gift Ban and Disclosure Law

The Vermont Legislature enacted the Pharmaceutical Marketing Disclosure Law in 2002, and amended it in every year between 2004 and 2011 with the exception of 2008. In 2009, the legislature mandated reporting of expenditures for biologics and medical devices, as well as expenditures relating to clinical trials and research, both effective with the FY11 report. The legislature also mandated reporting of the distribution of samples effective with the 2011 report.

⁷ Manufacturers also reported having spent an additional approximate amount of \$443,000 on five clinical trials during calendar years 2007 through 2010; those expenditures were eligible for delayed disclosures for the reporting periods corresponding to those expenditure dates.

The law is now known as the Prescribed Products Disclosure Law. Only minor amendments were made to the law in 2010 and 2011.

The law in effect for the activity described in this report required manufacturers of prescribed products to report to the Vermont Attorney General's Office "the value, nature, purpose, and recipient information" of allowable expenditures and permitted gifts and the "recipient, number of units, and dosage" of samples distributed to Vermont health care providers and institutions. 18 V.S.A. §§ 4632(a)(1), (2).

Many kinds of expenditures are banned in Vermont. In particular, the law bans manufacturers from giving gifts (including food), defined generally as "anything of value provided to a health care provider for free." 18 V.S.A. §§ 4631a(a)(5), (b)(1). Only the allowable expenditures and permitted gifts detailed as follows are exempt from this ban:

Allowable Expenditures:

- some payments associated with qualifying conferences or seminars
- some expenditures associated with qualifying clinical trials and research projects
- payment or reimbursement of reasonable expenses associated with technical training on medical devices
- royalties and licensing fees
- payments related to interviews for an employment opportunity or for health care services for employees
- other reasonable economic benefits provided at fair market value

18 V.S.A. § 4631a(a)(1).

Permitted Gifts:

- samples of prescribed products or reasonable amounts of some over-the-counter products for free distribution to patients
- short-term loans of medical devices
- reasonable quantities of medical device demonstration or evaluation units
- educational materials
- scholarships for medical students, residents and fellows to attend qualifying conferences or seminars
- rebates and discounts for prescribed products provided in the normal course of business
- FDA-approved drug labels
- free prescription or over-the-counter product or financial donations given to free clinics
- prescribed products distributed through manufacturer patient assistance programs
- some fellowship salary support payments
- coffee or other snacks or refreshments at a booth at a conference or seminar

18 V.S.A. § 4631a(b)(2).

The following allowable expenditures and permissible gifts were exempt from disclosure in 2011:

- royalties and licensing fees
- rebates and discounts for prescribed products
- certain payments relating to clinical trials
- interview of applicants or health care expenses of employees
- coffee or other snacks or refreshments at a booth at a conference or seminar
- certain loans of medical devices resulting in a purchase or lease of the device
- prescribed products distributed through patient assistance programs

18 V.S.A. §§ 4632(a)(1)(A), (a)(1)(B).

In 2009, the legislature eliminated the trade secret exemption which manufacturers had been permitted to claim in the past. However, disclosures of the distribution of samples as well as other product may only be reported to the public in aggregate form. 18 V.S.A. §§ 4632(a)(1)(B), (a)(1)(D), (a)(5). Thus, while expenditure disclosures have been posted along with this report on the Attorney General's Website: www.atg.state.vt.us, disclosures of the distribution of samples and other product have not.

III. Enforcement

Vermont's Prescribed Product Gift Ban and Disclosure Law requires the Attorney General to include in this annual report "[i]nformation on violations and enforcement actions" brought pursuant to the statute's enforcement provisions. 18 V.S.A. § 4632(a)(5)(B). During 2011, the Attorney General has conducted several investigations into potential violations of both the gift ban and the disclosure law. To date, however, no enforcement actions have been filed, nor have any investigations culminated in the execution of a settlement or other public document.

Exhibit 1a: Expenditures and Samples by Manufacturer, 2011

Rank by Expenditure Total	Rank by Number of Samples	Manufacturer	Expenditure Total	Number of Expenditures	Number of Samples	Number of Recipients
1	48	Aptalis	\$804,251.30	8	35	12
2	4	Pfizer	\$717,078.70	125	8,488	476
3	**	Novartis Pharmaceuticals	\$704,127.46	211		83
4	8	Abbott Laboratories	\$634,519.80	1,418	5,510	390
5	56	Medtronic	\$483,526.98	307	22	40
6	3	GlaxoSmithKline	\$309,234.04	871	8,726	616
7	10	Merck	\$301,228.47	283	3,863	369
8	16	Novo Nordisk	\$210,114.00	71	1,628	195
9	9	AstraZeneca	\$207,669.00	70	5,045	458
10	62	Eli Lilly	\$140,519.50	89	14	40
11	20	Allergan	\$138,292.81	181	1,273	121
12	**	Baxter Healthcare	\$135,608.51	5		3
13	**	Biosense Webster	\$128,083.00	34		4
14	24	Sanofi-Aventis	\$109,457.32	99	1,056	194
15	13	Boehringer Ingelheim	\$106,261.95	49	2,381	278
16	**	Philips Healthcare	\$105,243.09	14		7
17	**	Wright Medical Technology	\$105,000.94	47		2
18	**	Ethicon Endo-Surgery	\$96,061.93	55		40
19	**	Forest Pharmaceuticals	\$88,331.66	55		8
20	46	Amgen	\$77,284.46	104	52	47
21	28	Bayer HealthCare	\$75,086.47	7	630	138
22	11	Takeda Pharmaceuticals America	\$74,608.46	19	2,612	224
23	59	Genentech	\$72,417.00	7	16	12
24	**	The Medicines Company	\$70,266.00	28		1
25	**	OraSure Technologies	\$69,775.00	1		1
26	70	Biogen Idec	\$62,000.23	62	7	3
27	**	Olympus Corporation of the Americas	\$60,749.80	11		7
28	**	Zimmer	\$57,470.93	20		4
29	**	St. Jude Medical	\$57,262.10	9		4
30	**	Celgene	\$56,928.73	26		5
31	85	Maquet Cardiovascular	\$46,451.93	26	2	3
32	21	Janssen Pharmaceuticals	\$44,909.27	28	1,243	233
33	32	Warner Chilcott	\$33,111.00	2	329	62
34	7	Alcon Laboratories	\$33,087.00	7	6,706	134
35	**	Edwards Lifesciences	\$29,727.61	18		2
36	25	Millennium Pharmaceuticals	\$29,435.25	36	1,007	11
37	**	Codman & Shurtleff	\$28,522.57	9		3
38	**	Tactile Systems Technology	\$28,455.00	3		1

Rank by Expenditure Total	Rank by Number of Samples	Manufacturer	Expenditure Total	Number of Expenditures	Number of Samples	Number of Recipients
39	**	Regeneron Pharmaceuticals	\$27,624.10	11		2
40	**	Synthes	\$26,390.69	26		10
41	**	Globus Medical	\$25,617.40	9		2
42	18	Johnson & Johnson Vision Care	\$25,220.00	9	1,464	57
43	85	Orapharma	\$25,113.50	2	2	2
44	12	Bristol-Myers Squibb	\$24,483.64	32	2,536	175
45	49	Boston Scientific	\$23,280.74	32	32	14
46	**	Janssen Pharmaceutical Research & Development	\$22,967.38	2		2
47	**	Actelion Pharmaceuticals US	\$22,966.00	26		2
48	39	Becton Dickinson	\$22,747.68	7	162	32
49	49	Gilead Sciences	\$21,988.03	25		20
50	30	Teva	\$21,786.80	25	388	120
51	34	Purdue Pharma	\$21,172.36	5	223	81
52	**	Cook Medical	\$21,125.28	9		5
53	**	EMD Serono	\$19,325.10	18		3
54	**	Janssen Biotech	\$18,594.97	16		7
55	**	Hill-Rom	\$18,388.52	10		5
56	74	Merz Aesthetics	\$17,555.27	25	5	5
57	**	Covidien	\$16,852.34	34		17
58	62	UCB	\$16,776.27	11	14	14
59	40	Eisai	\$16,439.00	8	125	44
60	**	C. R. Bard	\$15,893.14	13		8
61	**	Acorda Therapeutics	\$15,515.87	7		2
62	**	Ethicon	\$15,456.00	6		5
63	**	Lantheus Medical Imaging	\$15,055.16	2		1
64	74	Hospira	\$14,482.23	5	5	5
65	53	Medicis Pharmaceutical	\$14,277.00	33	28	17
66	**	SI-Bone	\$14,197.41	12		2
67	**	Straumann Manufacturing	\$13,765.92	94		89
68	**	Seattle Genetics	\$13,412.00	5		1
69	19	Shire	\$13,315.74	9	1,436	57
70	69	Smith & Nephew	\$13,011.91	14	8	6
71	**	Stryker	\$12,941.31	116		47
72	85	Intuitive Surgical	\$12,743.00	10	2	10
73	**	Luitpold Pharmaceuticals	\$11,880.00	4		2
74	15	Daiichi Sankyo	\$11,848.12	14	1,759	128
75	**	Ortho-McNeil-Janssen Pharmaceuticals	\$11,433.34	37		28
76	**	Janssen Therapeutics	\$11,329.00	3		1
77	**	Depuy Mitek	\$10,745.00	9		7
78	17	Sunovion	\$10,142.82	3	1,599	245
79	**	Oticon	\$9,754.88	35		14
80	**	Sanofi Pasteur	\$9,747.03	15		2
81	**	St. Jude Medical SC, a division of St. Jude Medical	\$9,417.87	19		4

Exhibit 1a-2

Rank by Expenditure Total	Rank by Number of Samples	Manufacturer	Expenditure Total	Number of Expenditures	Number of Samples	Number of Recipients
82	23	Astellas Pharma US	\$9,305.72	10	1,139	153
83	**	GE Healthcare	\$8,567.40	20		16
84	**	Elan Pharmaceuticals	\$8,429.00	4		2
85	**	Human Genome Sciences	\$8,084.48	2		2
86	**	Biomet	\$7,491.92	9		3
87	**	Ortho-Clinical Diagnostics	\$7,449.04	10		5
88	**	Johnson & Johnson Pharmaceutical Research and Development	\$7,412.35	4		2
89	72	Carefusion	\$7,368.28	54	6	16
90	37	Endo Pharmaceuticals	\$6,729.22	2	185	66
91	**	Vertex Pharmaceuticals	\$6,705.63	1		1
92	**	Arthrex	\$5,991.00	16		15
93	**	Tornier	\$5,750.00	2		1
94	**	Biomet 3i	\$5,403.85	29		10
95	**	United Therapeutics Corporation	\$5,162.48	1		1
96	**	Centocor Ortho Biotech	\$4,998.90	6		5
97	35	Galderma Laboratories	\$4,831.67	76	201	15
98	**	ViiV Healthcare	\$4,650.00	2		1
99	70	Convatec	\$4,619.49	3	7	9
100	**	W. L. Gore & Associates	\$4,305.00	8		4
101	**	Masimo	\$4,231.07	3		2
102	42	Watson Pharmaceuticals	\$4,010.00	4	94	23
103	85	DJO	\$3,855.27	2	2	3
104	66	Medline Industries	\$3,772.07	257	12	30
105	**	Alexion Pharmaceuticals	\$3,679.00	5		4
106	59	Leo Pharma	\$3,542.00	16	16	4
107	**	Nobel Biocare USA	\$3,397.00	11		7
108	78	3m ESPE Dental Products	\$3,342.17	3	4	5
109	45	Roche Diagnostics Operations	\$3,269.15	9	72	13
110	**	Swedish Orphan Biovitrum AB	\$3,068.30	1		1
111	**	Draeger Medical Systems	\$3,000.00	2		2
112	92	Genzyme	\$2,950.00	2	1	3
113	58	Ferring Pharmaceuticals	\$2,923.00	8	17	13
114	**	Starkey Laboratories	\$2,900.00	2		2
115	**	Talecris Biotherapeutics	\$2,877.00	1		1
116	**	Respiratory & Monitoring Solutions, a division of Covidien	\$2,750.00	2		1
117	**	Somaxon Pharmaceuticals	\$2,618.00	1		1
118	**	St. Jude Medical Cardiology Division d/b/a St. Jude Medical Cardiovascular Division	\$2,452.00	1		1
119	55	Amylin Pharmaceuticals	\$2,324.00	8	26	19
120	**	Integra Lifesciences	\$2,262.00	6		3
121	**	KCI USA	\$1,958.40	2		2

Exhibit 1a-3

Rank by Expenditure Total	Rank by Number of Samples	Manufacturer	Expenditure Total	Number of Expenditures	Number of Samples	Number of Recipients
122	**	Advanced Neuromodulation Systems d/b/a St. Jude Medical Neuromodulation Division	\$1,945.45	1		1
123	**	Grifols Therapeutics	\$1,940.36	3		2
124	**	Cordis	\$1,788.00	2		1
125	**	Karl Storz Endoskope	\$1,750.00	119		20
126	**	Medimmune	\$1,750.00	2		2
127	36	Reckitt Benckiser	\$1,748.50	3	199	69
128	**	Merz Pharmaceuticals	\$1,722.00	1		1
129	**	Arthrocare	\$1,707.87	4		1
130	61	B. Braun Medical	\$1,667.84	4	15	13
131	**	Ossur Americas	\$1,661.00	7		2
132	**	Vascular Solutions	\$1,565.73	11		6
133	**	Beckman Coulter	\$1,500.00	1		1
134	**	King Pharmaceuticals	\$1,443.97	4		1
135	**	Mentor Worldwide	\$1,352.00	1		1
136	**	Neurogesx	\$1,301.40	1		1
137	**	LifeCell Corporation	\$1,236.00	1		1
138	**	Thermo Fisher Scientific	\$1,200.00	1		1
139	**	Insulet Corporation	\$1,188.00	9		3
140	27	3M	\$1,154.53	23	725	202
141	65	Coloplast	\$1,098.40	2	13	12
142	**	LightLab Imaging	\$890.00	1		1
143	**	Lanx	\$876.75	1		1
144	**	Hoya Vision Care	\$867.61	1		1
145	2	Cooper Vision	\$750.00	1	10,839	82
145	**	Dendreon	\$750.00	1		1
145	**	Energy-Based Devices, a division of Covidien	\$750.00	1		1
145	**	Surgi-Care	\$750.00	1		1
149	**	American Medical Systems	\$746.38	28		10
150	**	Depuy Orthopaedics	\$739.21	16		7
151	78	Jazz Pharmaceuticals	\$733.08	2	4	5
152	**	Transitions Optical	\$700.00	7		7
153	**	Fisher & Paykel Healthcare	\$643.27	1		1
154	**	Pacesetter d/b/a St. Jude Medical Cardiac Rhythm Management Division	\$640.24	1		1
155	**	Cadence Pharmaceuticals	\$618.96	2		1
156	**	St. Jude Medical Atrial Fibrillation Division	\$604.75	1		1
157	**	Nestle Healthcare Nutrition	\$485.00	3		3
158	6	Bausch & Lomb	\$459.60	1	7,110	83
159	31	LifeScan	\$400.00	1	376	125
160	62	Essilor of America	\$259.00	3	14	9
161	83	CSL Behring	\$250.00	1	3	4
162	**	Timm Medical Technologies	\$235.00	1		1

Exhibit 1a-4

Rank by Expenditure Total	Rank by Number of Samples	Manufacturer	Expenditure Total	Number of Expenditures	Number of Samples	Number of Recipients
163	**	Actavis	\$221.00	7		1
164	**	McKesson Technologies	\$200.00	1		1
165	**	Sigma-Tau Pharmaceuticals	\$187.34	1		1
166	**	Cardinal Health	\$186.62	30		6
167	**	Johnson & Johnson Health Care Systems	\$126.00	2		2
168	**	Applied Medical Resources	\$121.88	1		1
169	**	Tibotec Therapeutics	\$119.00	1		1
170	**	Savient Pharmaceuticals	\$117.76	1		1
171	**	QLT Ophthalmics	\$115.77	3		2
172	**	Terumo Medical Corporation	\$114.00	2		2
173	**	Horizon Pharma	\$106.25	1		1
174	49	KV Pharmaceutical	\$93.24	1	32	10
175	**	Slate Pharmaceuticals	\$92.35	2		2
176	44	Valeant	\$57.00	3	81	14
177	**	Siemens Hearing Instruments	\$37.67	1		1
178	**	EBI d/b/a Biomet Spine & Bone Healing Technologies	\$35.00	2		1
179	**	Biomet Microfixation	\$10.76	1		1
180	**	Allos Therapeutics	\$5.22	2		1
181	**	Cochlear Americas	\$0.00	15		5
*	1	CIBA Vision			10,991	44
*	5	Vistakon			8,008	42
*	14	Schering			1,881	302
*	22	URL Pharma			1,228	6
*	26	Otsuka America Pharmaceuticals			804	64
*	29	Cephalon			490	84
*	33	Bayer			230	88
*	38	Hydrogel Vision			174	12
*	41	Zogenix			112	60
*	43	Salix Pharmaceuticals			86	14
*	47	ISTA Pharmaceuticals			39	8
*	52	Mylan Specialty f/k/a Dey Pharma			29	20
*	54	Par Pharmaceutical			27	5
*	57	Animas			19	3
*	67	ConMed			11	8
*	68	Dr. Reddy's Laboratories			10	2
*	72	Arbor Pharmaceuticals			6	5
*	74	Janssen Biologics			5	2
*	74	Noven Pharmaceuticals			5	1
*	78	3M Unitek			4	4
*	78	Ortho Dermatologics			4	2
*	78	Shionogi			4	1
*	83	Teleflex Medical			3	3
*	85	Merit Medical Systems			2	2

Exhibit 1a-5

Rank by Expenditure Total	Rank by Number of Samples	Manufacturer	Expenditure Total	Number of Expenditures	Number of Samples	Number of Recipients
*	85	Prometheus Laboratories			2	2
*	85	Solstice Neurosciences			2	1
*	92	Auxilium Pharmaceuticals			1	1
*	92	B. Braun Interventional Systems			1	1
*	92	Hoya			1	1
*	92	Xanodyne Pharmaceuticals			1	1
Totals:		211 Manufacturers	\$7,503,191.70	6,179	105,838	--

* Manufacturer did not disclose any expenditures.

** Manufacturer did not disclose any samples.

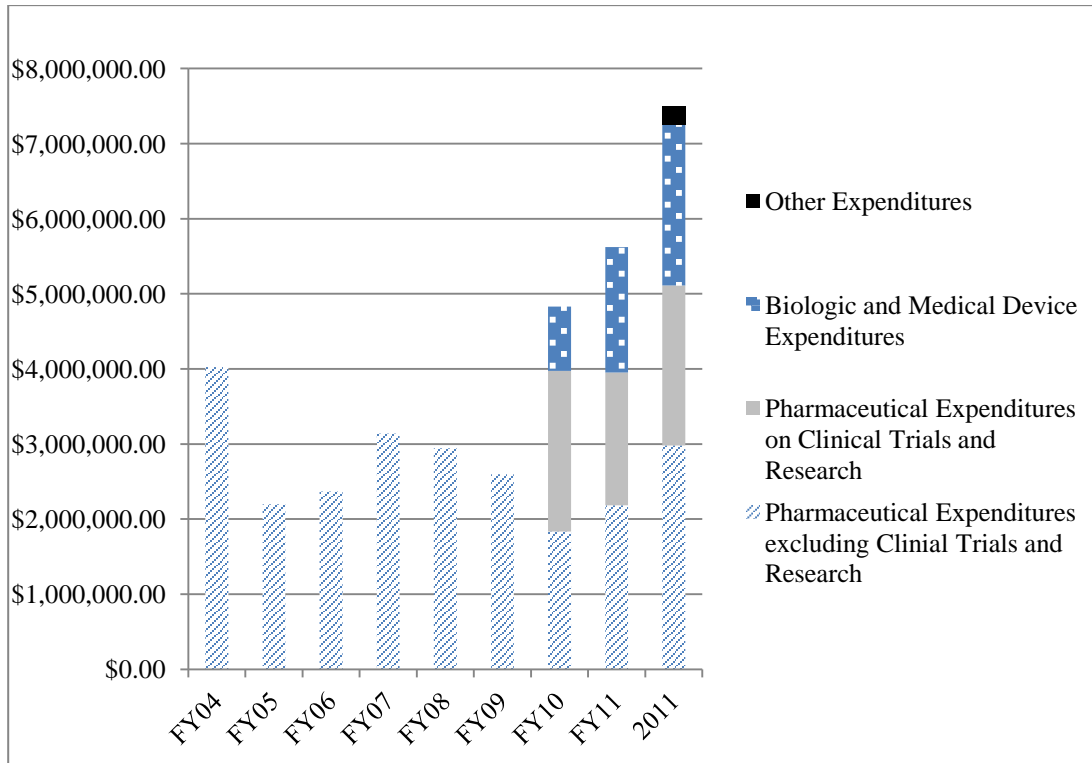
Exhibit 2: Expenditures and Samples by Product Type, 2011

Product Type	Expenditure Total	Percent of Expenditure Total	Number of Expenditures	Percent of Number of Expenditures	Number of Samples	Percent of Number of Samples
Pharmaceutical	\$10,389,370.62	73.5%	3,273	31.5%	80,658	62.6%
Medical Device	\$2,853,699.28	20.2%	5,684	54.7%	47,570	36.9%
Biologic	\$619,071.21	4.4%	385	3.7%	159	0.1%
Combination Product	\$135,608.51	1.0%	5	0.05%	2	0.002%
Unknown	\$100,507.35	0.7%	4	0.04%	0	0.0%
Over the Counter Product	\$43,235.30	0.3%	1,048	10.1%	412	0.3%

Totals: \$14,141,492.28 10,399 128,801

Note: This exhibit is meant to show only the proportional breakdown of expenditures and samples by product type. For purposes of this exhibit, when manufacturers disclosed an expenditure in connection with several different products, or a sample containing several different products, the Attorney General’s Office assigned the expenditure or sample to each of the products disclosed in connection with the expenditure or sample.

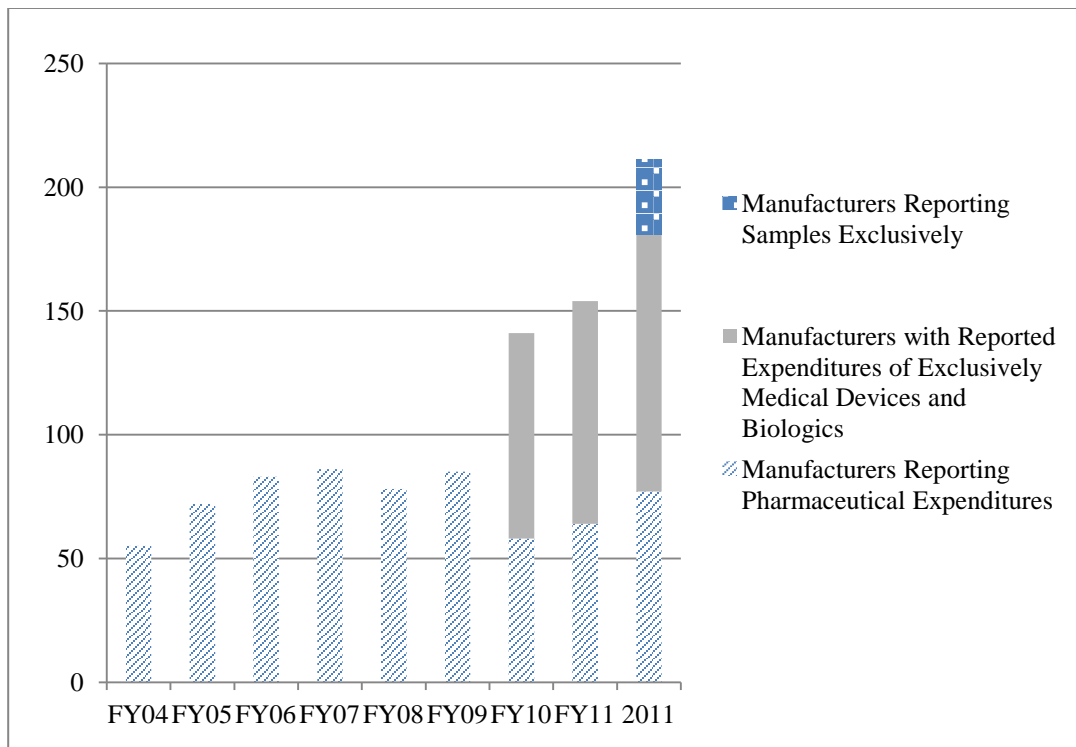
Exhibit 3: Total Expenditures, FY04-2011



Total Expenditures	
FY04	\$4,026,576.24
FY05	\$2,196,592.26
FY06	\$2,367,604.33
FY07	\$3,139,584.63
FY08	\$2,943,321.38
FY09	\$2,599,589.00
FY10 Pharmaceutical Expenditures, Excluding Clinical Trials and Research	\$1,835,101.79
FY10 Pharmaceutical Expenditures	\$3,973,654.69
FY10 Biologic and Medical Device Expenditures	\$855,914.49
FY10 Total Expenditures	\$4,829,569.18
FY11 Pharmaceutical Expenditures, Excluding Clinical Trials and Research	\$2,183,451.56
FY11 Pharmaceutical Expenditures	\$3,952,608.42
FY11 Biologic and Medical Device Expenditures	\$1,672,282.65
FY11 Total Expenditures	\$5,624,891.07
2011 Pharmaceutical Expenditures, Excluding Clinical Trials and Research	\$2,980,770.44
2011 Pharmaceutical Expenditures	\$5,111,507.63
2011 Biologic and Medical Device Expenditures	\$2,142,179.29
2011 Other Expenditures	\$249,504.77
2011 Total Expenditures	\$7,503,191.70

Note: For purposes of this exhibit, when manufacturers disclosed one expenditure as associated with several different products, the Attorney General’s Office assigned the entire expenditure to the first product associated with the expenditure.

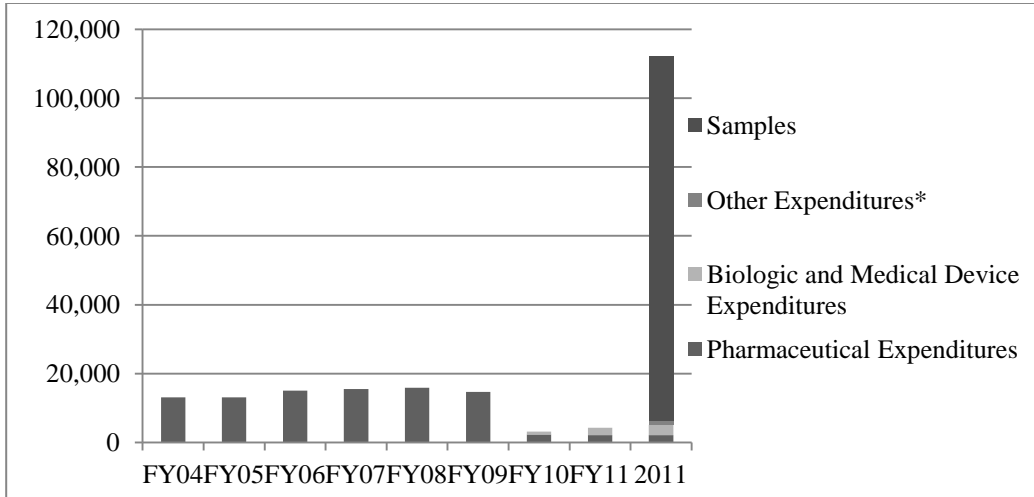
Exhibit 4: Total Manufacturers Reporting Expenditures and Samples, FY04-2011



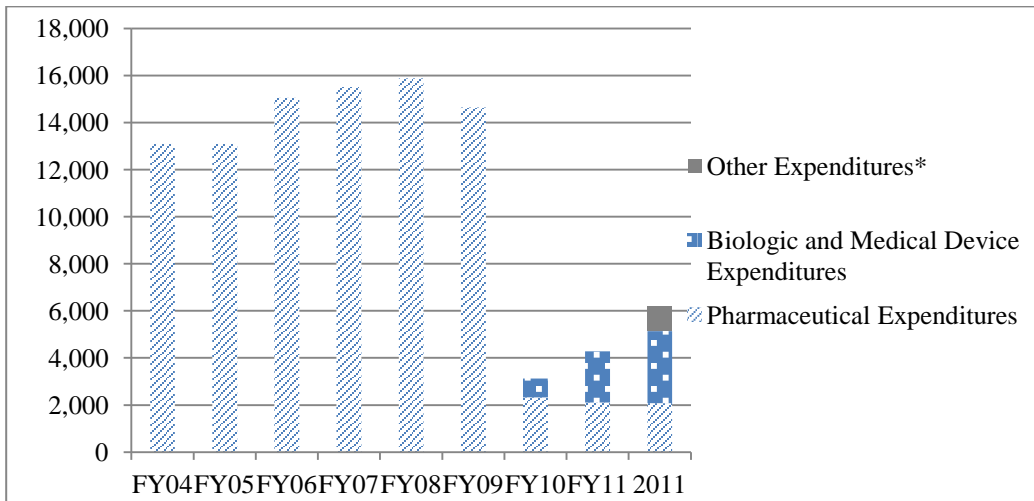
Total Number of Manufacturers Reporting Expenditures	
FY04	55
FY05	72
FY06	83
FY07	86
FY08	78
FY09	85
FY10 Pharmaceutical Expenditures	58
FY10 Total Expenditures	141
FY11 Pharmaceutical Expenditures	64
FY11 Total Expenditures	154
2011 Pharmaceutical Expenditures	77
2011 Total Expenditures	181
2011 Grand Total Expenditures and Samples	211

Note: For purposes of this exhibit, when manufacturers disclosed one expenditure as associated with several different products, the Attorney General’s Office assigned the entire expenditure to the first product associated with the expenditure.

Exhibit 5: Total Number of Expenditures and Samples with Expenditure Detail, FY04-2011



Total Number of Expenditures	
FY04	13,088
FY05	13,086
FY06	15,043
FY07	15,505
FY08	15,880
FY09	14,636
FY10 Pharmaceutical Expenditures	2,322
FY10 Total Expenditures	3,122
FY11 Pharmaceutical Expenditures	2,107
FY11 Total Expenditures	4,277
2011 Pharmaceutical Expenditures	2,082
2011 Biologic and Medical Device Expenditures	3,050
2011 Other Expenditures	1,047
2011 Total Expenditures	6,179
2011 Grand Total Expenditures and Samples	112,017



* Other Expenditures refers to expenditures associated with combination, over the counter, and unknown product.

Note: For purposes of this exhibit, when manufacturers disclosed one expenditure as associated with several different products, the Attorney General's Office assigned the entire expenditure to the first product associated with the expenditure.

Exhibit 6: Top Five Manufacturers – Manufacturers with Highest Expenditures or Most Samples, FY07-2011

2011 Rank by Expenditure Total (Rank by Number of Samples)	FY07	FY08	FY09	FY10	FY11	2011
1 (48)	Eli Lilly	Eli Lilly	Eli Lilly	Pfizer	Abbott Laboratories	Aptalis
2 (4)	Pfizer	Pfizer	Pfizer	GlaxoSmithKline	Novartis Pharmaceuticals	Pfizer
3 (n/a)	UCB	Novartis Pharmaceuticals	Forest Pharmaceuticals	Novartis Pharmaceuticals	GlaxoSmithKline	Novartis Pharmaceuticals
4 (8)	Novartis Pharmaceuticals	Merck	Merck and Merck Schering Plough	Daiichi Sankyo	Eli Lilly	Abbott Laboratories
5 (56)	Merck	Forest Pharmaceuticals	GlaxoSmithKline	Eli Lilly	Medtronic	Medtronic
Expenditure Total for Top 5 Manufacturers	\$1,756,150.56	\$1,519,745.18	\$1,230,540.64	\$2,266,455.09	\$2,164,273.99	\$3,343,504.24
Percentage of Overall Expenditure Total Attributable to Expenditures of Top 5 Manufacturers*	56%	52%	47%	47%	39%	45%

2011 Rank by Number of Samples (Rank by Expenditure Total)	2011
1 (n/a)	CIBA Vision
2 (145)	Cooper Vision
3 (6)	GlaxoSmithKline
4 (2)	Pfizer
5 (n/a)	Vistakon
Number of Samples for Top 5 Manufacturers	47,052
Percentage of Overall Sample Total Attributable to Top 5 Manufacturers**	44%

* Approximately 13% of the overall sample total was attributable to the samples of the top five manufacturers by expenditure total.

** Approximately 14% of the overall expenditure total was attributable to the expenditures of the top five manufacturers by number of samples.

Exhibit 8a: Expenditures by Specialty or Credential for Individual Health Care Providers who Received \$3,000 or More in Expenditures, FY08-2011

2011 Rank	Specialty or Credential	FY08 Expenditure Total	FY09 Expenditure Total	FY10 Expenditure Total	FY11 Expenditure Total	2011 Expenditure Total
1	Neurology	\$193,377.79	\$159,364.01	\$141,546.85	\$184,940.17	\$186,353.49
2	Cardiac Electrophysiology					\$150,698.27
3	Internal Medicine	\$272,737.14	\$206,178.83	\$29,029.49	\$104,570.25	\$146,077.64
4	Orthopaedic Surgery			\$4,106.00	\$75,607.74	\$132,384.24
5	Diagnostic Radiology				\$17,763.44	\$89,375.28
6	Cardiovascular Disease	\$47,034.11	\$49,516.79	\$24,499.00	\$12,082.00	\$86,292.33
7	Advanced Practice Registered Nurse (APRN)	\$80,865.25	\$80,384.07	\$31,990.58	\$43,339.83	\$78,387.33
8	Hematology		\$16,777.16	\$19,088.85	\$17,251.00	\$51,150.54
9	Pain Management					\$50,790.96
10	Psychiatry	\$396,978.52	\$378,729.91	\$151,001.77	\$125,142.44	\$46,959.53
11	Cardiovascular Surgery					\$45,404.52
12	Endocrinology, Diabetes and Metabolism	\$176,347.61	\$86,345.52	\$40,083.21	\$36,676.00	\$39,891.62
13	Critical Care Medicine	\$6,338.00	\$6,467.59	\$12,085.00	\$9,872.00	\$38,378.24
14	Addiction Psychiatry		\$9,558.69			\$26,100.79
15	General Vascular Surgery					\$25,629.37
16	Licensed Practical Nurse (LPN)					\$18,302.14
17	Geriatric Medicine	\$51,672.20	\$77,338.32	\$68,987.88	\$108,524.57	\$16,408.96
18	Obstetrics and Gynecology				\$4,300.00	\$12,859.52
19	Blood Banking/Transfusion Medicine					\$12,235.34
20	Osteopathic Physician	\$78,645.84	\$60,461.04	\$64,349.16	\$31,561.29	\$11,581.32
21	Anesthesiology				\$6,469.95	\$11,087.82
22	Allergy and Immunology	\$38,567.50	\$4,600.38			\$10,872.64
23	Dermatology	\$15,190.14	\$6,449.30	\$3,220.00	\$3,776.40	\$10,398.12
24	Family Practice	\$96,115.95	\$122,691.13			\$8,498.82
25	Clinical Neurophysiology	\$7,246.02				\$7,062.92
26	Limited Temporary Permit Physician	\$7,508.19	\$33,148.00			\$5,736.00
27	Pediatric Gastroenterology			\$8,549.46		\$5,257.02
28	Gastroenterology	\$5,209.76		\$14,966.00		\$4,749.54
29	Physician Assistant (PA)	\$18,915.32	\$3,880.65			\$4,000.00
30	Urology	\$17,614.24	\$18,233.21	\$8,859.34	\$3,098.43	\$3,031.07

Exhibit 8b: Samples by Specialty or Credential for Individual Health Care Providers who Received 250 or More Samples, 2011

Rank	Specialty or Credential	Number of Samples
1	Optometrist	21,831
2	Internal Medicine	7,423
3	Family Practice	6,136
4	Physician Assistant (PA)	2,011
5	Critical Care Medicine	1,185
6	Endocrinology, Diabetes and Metabolism	836
7	Cardiovascular Disease	638
8	Advanced Practice Registered Nurse (APRN)	279

Total Number of Samples: 40,339

Total Recipients: 52

Note: Doctor Specialties are self-reported; other health care provider credentials are according to licensure.

Exhibit 9a: Expenditures by Payment Purpose for Individual Health Care Providers Receiving \$3,000 or More in Expenditures, 2011

Rank	Health Care Provider Specialty/ Credential	Expenditure Total	Consulting/ Surveys	Educational Materials	Faculty Expense	Faculty Honoraria/ Speaker Fee	Medical Device - Loans, Demos	Medical Device Training - Compensation	Medical Device Training - Other Expenses	Other	Other Fair Market Value Payment	Research Project - Expenses	Research Project - Gross Compensation	Research Project - Salary Support
1	Neurology	\$143,273.75			\$14,622.28	\$51,075.00				\$10,098.46	\$67,478.00			
2	Diagnostic Radiology	\$89,375.28	\$87,875.28			\$1,500.00								
3	Cardiac Electrophysiology	\$87,550.64	\$14,213.21			\$7,000.00			\$1,671.43		\$64,666.00			
4	Internal Medicine	\$59,740.83			\$10,540.83	\$49,200.00								
5	Orthopaedic Surgery	\$55,937.36										\$4,900.53	\$51,036.83	
6	Cardiac Electrophysiology	\$54,771.63	\$35,830.00		\$2,043.99	\$9,000.00			\$521.25	\$7,376.39				
7	Orthopaedic Surgery	\$54,554.71	\$1,750.00	\$326.50		\$1,750.00			\$1,664.63			\$4,756.08	\$44,307.50	
8	Pain Management	\$50,790.96	\$19,606.34		\$4,464.52	\$23,570.10							\$3,150.00	
9	Psychiatry	\$46,959.53	\$10,142.82								\$36,816.71			
10	Cardiovascular Surgery	\$41,971.17	\$416.19		\$1,993.38	\$4,000.00			\$2,159.04		\$33,402.56			
11	Endocrinology, Diabetes and Metabolism	\$39,891.62	\$19,496.92		\$1,950.00	\$11,050.00	\$396.00				\$6,998.70			
12	Internal Medicine	\$38,596.97	\$25,446.45		\$1,778.52	\$5,375.00			\$2,500.00		\$3,497.00			
13	Critical Care Medicine	\$38,378.24	\$28,123.15		\$1,124.67	\$7,100.00			\$2,030.42					
14	Cardiovascular Disease	\$35,734.46			\$4,088.46	\$18,000.00					\$13,646.00			
15	Neurology	\$33,178.03	\$29,250.00							\$3,928.03				
16	Addiction Psychiatry	\$26,100.79	\$5,400.00		\$1,700.79	\$19,000.00								
17	General Vascular Surgery	\$25,629.37	\$21,096.77	\$99.95					\$506.85			\$3,925.80		
18	Advanced Practice Registered Nurse (APRN)	\$25,330.60		\$100.00	\$1,640.08	\$13,641.27					\$9,949.25			
19	Hematology	\$19,721.97	\$8,375.47	\$174.00	\$1,675.42	\$8,300.00				\$597.08	\$600.00			
20	Internal Medicine	\$19,666.23	\$9,242.62		\$4,654.39	\$5,200.00				\$446.92	\$122.30			

Rank	Health Care Provider Specialty/Credential	Expenditure Total	Consulting/Surveys	Educational Materials	Faculty Expense	Faculty Honoraria/Speaker Fee	Medical Device - Loans, Demos	Medical Device Training - Compensation	Medical Device Training - Other Expenses	Other	Other Fair Market Value Payment	Research Project - Expenses	Research Project - Gross Compensation	Research Project - Salary Support
21	Advanced Practice Registered Nurse (APRN)	\$19,136.00								\$8,252.00	\$10,884.00			
22	Cardiovascular Disease	\$18,032.68									\$18,032.68			
23	Advanced Practice Registered Nurse (APRN)	\$17,346.95			\$2,596.95	\$14,750.00								
24	Internal Medicine	\$17,237.20	\$17,237.20											
25	Hematology	\$13,683.97	\$8,123.83	\$50.00	\$3,108.95					\$677.09	\$1,724.10			
26	Cardiovascular Disease	\$13,366.99	\$13,366.99											
27	Cardiovascular Disease	\$13,168.44	\$9,101.00		\$20.00	\$3,500.00					\$547.44			
28	Geriatric Medicine	\$12,495.00			\$1,255.00	\$11,240.00								
29	Blood Banking/Transfusion Medicine	\$12,235.34	\$2,500.00	\$10.00							\$9,725.34			
30	Osteopathic Physician	\$11,581.32	\$4,220.92								\$7,360.40			
31	Licensed Practical Nurse (LPN)	\$11,571.21			\$851.21	\$3,600.00					\$7,120.00			
32	Allergy and Immunology	\$10,872.64		\$9.95	\$2,831.88	\$8,000.00				\$30.81				
33	Hematology	\$10,844.60	\$7,847.65	\$68.95							\$2,928.00			
34	Neurology	\$9,901.71	\$1,035.70			\$2,250.00					\$6,616.01			
35	Advanced Practice Registered Nurse (APRN)	\$8,518.78	\$5,535.94	\$71.95	\$71.40	\$1,200.00			\$639.49		\$1,000.00			
36	Cardiac Electrophysiology	\$8,376.00								\$170.00	\$8,206.00			
37	Advanced Practice Registered Nurse (APRN)	\$8,055.00		\$60.00			\$7,995.00							
38	Orthopaedic Surgery	\$7,748.21	\$135.04		\$595.00	\$5,970.00				\$448.17	\$600.00			
39	Internal Medicine	\$7,676.19	\$2,729.28		\$224.91	\$4,722.00								
40	Dermatology	\$7,371.05	\$240.00	\$17.00			\$7,102.05			\$12.00				

Rank	Health Care Provider Specialty/Credential	Expenditure Total	Consulting/Surveys	Educational Materials	Faculty Expense	Faculty Honoraria/Speaker Fee	Medical Device - Loans, Demos	Medical Device Training - Compensation	Medical Device Training - Other Expenses	Other	Other Fair Market Value Payment	Research Project - Expenses	Research Project - Gross Compensation	Research Project - Salary Support
41	Clinical Neurophysiology	\$7,062.92			\$2,462.92	\$4,600.00								
42	Anesthesiology	\$6,469.95			\$469.95	\$6,000.00								
43	Cardiovascular Disease	\$5,989.76	\$4,743.76						\$1,246.00					
44	Orthopaedic Surgery	\$5,750.00				\$5,750.00								
45	Limited Temporary Permit Physician	\$5,736.00					\$5,736.00							
46	Obstetrics and Gynecology	\$5,461.09					\$5,461.09							
47	Pediatric Gastroenterology	\$5,257.02	\$5,257.02											
48	Orthopaedic Surgery	\$5,000.00												\$5,000.00
49	Gastroenterology	\$4,749.54	\$4,749.54											
50	Family Practice	\$4,698.82	\$2,000.00				\$651.00			\$2,047.82				
51	Anesthesiology	\$4,617.87			\$98.95		\$4,488.00		\$30.80	\$0.12				
52	Obstetrics and Gynecology	\$4,300.00						\$2,150.00	\$2,150.00					
53	Physician Assistant (PA)	\$4,000.00				\$4,000.00								
54	Geriatric Medicine	\$3,913.96			\$1,381.96	\$2,532.00								
55	Hematology	\$3,900.00	\$3,900.00											
56	Family Practice	\$3,800.00	\$3,800.00											
57	Licensed Practical Nurse (LPN)	\$3,531.76			\$531.76	\$3,000.00								
58	Cardiovascular Surgery	\$3,433.35							\$3,433.35					
59	Orthopaedic Surgery	\$3,393.96					\$0.00		\$3,393.96					
60	Licensed Practical Nurse (LPN)	\$3,199.17				\$1,667.50					\$1,531.67			
61	Internal Medicine	\$3,160.22										\$510.22	\$2,650.00	
62	Obstetrics and Gynecology	\$3,098.43	\$1,857.00		\$1,223.03					\$18.40				
63	Urology	\$3,031.07	\$3,031.07											
64	Dermatology	\$3,027.07	\$265.00				\$2,650.00			\$112.07				

Exhibit 9a-3

Rank	Health Care Provider Specialty/Credential	Expenditure Total	Consulting/Surveys	Educational Materials	Faculty Expense	Faculty Honoraria/Speaker Fee	Medical Device - Loans, Demos	Medical Device Training - Compensation	Medical Device Training - Other Expenses	Other	Other Fair Market Value Payment	Research Project - Expenses	Research Project - Gross Compensation	Research Project - Salary Support
65	Hematology	\$3,000.00	\$3,000.00											

Totals: \$1,335,955.36 \$420,942.16 \$988.30 \$70,001.20 \$317,542.87 \$34,479.14 \$2,150.00 \$21,947.22 \$34,215.35 \$313,452.15 \$14,092.63 \$101,144.33 \$5,000.00

Note: For purposes of this exhibit, expenditures associated with clinical trials have been excluded. Doctor specialties are self-reported; other health care provider credentials are according to licensure.

Exhibit 9b: Sample Content Detail for Individual Health Care Providers Receiving 250 or More Samples, 2011

Rank	Specialty or Credential	Total Number of Samples	Contents of Sample by Content Category			Contents of Sample by Product Type*		
			Product	Voucher	Other	Pharmaceutical	Medical Device	Over the Counter Product
1	Optometrist	9,735	9,630	3	102	130	9,596	9
2	Optometrist	3,629	3,570	2	57	18	3,592	9
3	Optometrist	1,773	1,743	1	29	14	1,759	
4	Optometrist	1,103	1,077		27	11	1,082	10
5	Internal Medicine	1,092	1,019	93	57	1,524	48	
6	Internal Medicine	1,080	998	107	60	1,194		1
7	Family Practice	911	843	87	9	1,084		
8	Internal Medicine	872	777	113	14	1,203		1
9	Optometrist	854	821	1	32	20	832	2
10	Internal Medicine	798	725	87	28	1,177	86	1
11	Optometrist	754	717	8	34	45	715	2
12	Optometrist	742	694	1	49	49	674	22
13	Optometrist	703	660	6	48	44	664	12
14	Family Practice	678	621	78	8	709		
15	Family Practice	641	555	101	20	925	10	1
16	Physician Assistant (PA)	639	584	72	15	836		
17	Cardiovascular Disease	638	605	52	39	710		
18	Family Practice	608	514	115	30	773	99	4
19	Critical Care Medicine	589	518	85	7	617	5	
20	Optometrist	557	524	1	33	38	520	
21	Optometrist	549	543	2	7		554	
21	Endocrinology, Diabetes and Metabolism	549	510	55	18	576	33	2
23	Internal Medicine	545	505	40	7	554		
24	Physician Assistant (PA)	536	492	52	32	586		1
25	Internal Medicine	523	467	66	27	791	42	
26	Optometrist	494	395	2	99	71	407	10
27	Physician Assistant (PA)	491	439	65	1	684		

Rank	Specialty or Credential	Total Number of Samples	Contents of Sample by Content Category			Contents of Sample by Product Type*		
			Product	Voucher	Other	Pharmaceutical	Medical Device	Over the Counter Product
28	Internal Medicine	490	436	69	11	870		1
29	Family Practice	448	410	49	5	470		
30	Family Practice	415	383	44	18	446	15	
31	Family Practice	386	290	104	26	424		
32	Optometrist	377	364	1	13		366	12
33	Family Practice	375	328	55	5	618		1
33	Family Practice	375	334	53	29	894	110	
35	Internal Medicine	361	277	91	3	420	43	
36	Family Practice	354	268	91	16	462	73	1
37	Physician Assistant (PA)	345	325	20	12	472		
38	Family Practice	332	308	33	14	498	10	1
39	Critical Care Medicine	330	293	37		330		
40	Family Practice	316	274	50	5	332	5	
41	Family Practice	297	265	29	6	306		
42	Optometrist	296	283		13	2	296	
43	Internal Medicine	295	272	30	16	387	36	
44	Internal Medicine	288	269	20	13	783	18	
45	Endocrinology, Diabetes and Metabolism	287	279	10	14	256	68	
45	Internal Medicine	287	277	16	7	564	20	
47	Advanced Practice Registered Nurse (APRN)	279	240	40	8	291		
48	Internal Medicine	274	241	41	8	391	67	
49	Internal Medicine	267	221	54		280		
50	Critical Care Medicine	266	232	38	10	395		
51	Optometrist	265	251		14		254	13
52	Internal Medicine	251	229	26	10	345	9	
Totals:		40,339	37,895	2,296	1,165	24,619	22,108	116

* No biologic products were included in any sample distributed to individual health care providers receiving 250 or more samples in 2011.

Note: Doctor specialties are self-reported; other health care provider credentials are according to licensure.

Exhibit 10a: Top Products – 50 Products with Greatest Expenditures, 2011

Rank	Product Name	Manufacturer	Product Type	Primary Indication	Expenditure Total	Number of Times Sampled
1	Zenpep	Aptalis	Pharmaceutical	Exocrine Pancreatic Insufficiency	\$804,251.30	11
2	Canasa	Aptalis	Pharmaceutical	Active Ulcerative Proctitis	\$802,251.30	18
2	Pylera	Aptalis	Pharmaceutical	H. Pylori Infection	\$802,251.30	4
4	Humira	Abbott Laboratories	Pharmaceutical	Rheumatoid Arthritis	\$468,925.88	20
5	Tricor	Abbott Laboratories	Pharmaceutical	Hypercholesterolemia	\$440,728.93	**
6	Depakote	Abbott Laboratories	Pharmaceutical	Bipolar Disorder	\$437,971.31	**
7	Kaletra	Abbott Laboratories	Pharmaceutical	HIV	\$436,695.68	**
8	Ultane	Abbott Laboratories	Pharmaceutical	General Anesthesia	\$436,484.11	**
9	Gilenya	Novartis	Pharmaceutical	Multiple Sclerosis	\$352,181.49	10
10	Tekturna	Novartis	Pharmaceutical	Hypertension	\$213,061.10	42
11	Victoza	Novo Nordisk	Pharmaceutical	Type 2 Diabetes	\$204,389.00	295
12	Novolog	Novo Nordisk	Pharmaceutical	Types 1 and 2 Diabetes	\$145,359.00	536
13	Levemir	Novo Nordisk	Pharmaceutical	Types 1 and 2 Diabetes	\$145,036.00	483
13	Novolog Mix	Novo Nordisk	Pharmaceutical	Types 1 and 2 Diabetes	\$145,036.00	179
15	Norditropin	Novo Nordisk	Pharmaceutical	Growth Hormone Deficiency	\$127,479.00	**
16	Ablation Catheters/Accessories	Biosense Webster	Medical Device	Cardiac Arrhythmia	\$118,196.00	**
17	Neoss	Wright Medical Technology	Medical Device	Orthopaedic	\$101,358.00	**
18	Imaging Systems	Philips Healthcare	Medical Device	Imaging	\$96,993.09	**
19	Januvia	Merck	Pharmaceutical	Type 2 Diabetes	\$90,162.16	521
20	Cardiac Resynchronzation Therapy	Medtronic	Medical Device	Systolic Dysfunction	\$83,066.69	**
21	Zetia	Schering & Merck	Pharmaceutical	Hyperlipidemia	\$79,402.83	494
22	Leads	Medtronic	Medical Device	Leads	\$77,987.43	**
23	Vytorin*	Merck	Pharmaceutical	Hyperlipidemia	\$76,362.78	631
24	Angiomax	The Medicines Company	Pharmaceutical	Unstable Angina	\$70,266.00	**
25	OraQuick HCV Rapid Antibody Test	OraSure Technologies	Medical Device	Hepatitis C Test	\$69,775.00	**
26	Semagacestat	Eli Lilly	Pharmaceutical	Unknown	\$66,707.00	**
27	Bystolic	Forest Pharmaceuticals	Pharmaceutical	Hypertension	\$66,597.83	**
28	Emend	Merck	Pharmaceutical	Nausea and Vomiting	\$66,490.83	10

Rank	Product Name	Manufacturer	Product Type	Primary Indication	Expenditure Total	Number of Times Sampled
29	Echelon Flex 45 endo-cutter,Echelon 45 Reloads,Lapra-Ty clip applier, Lapra-Ty suture clips,Endo-Loop	Ethicon Endo-Surgery	Medical Device	Laparoscopic Surgery	\$63,305.33	**
30	Savella	Forest Pharmaceuticals	Pharmaceutical	Fibromyalgia	\$62,789.86	**
31	Namenda	Forest Pharmaceuticals	Pharmaceutical	Alzheimer's	\$59,589.86	**
32	Beyaz	Bayer HealthCare	Pharmaceutical	Birth Control	\$56,948.08	135
32	Mirena	Bayer HealthCare	Pharmaceutical	Birth Control	\$56,948.08	**
32	Natazia	Bayer HealthCare	Pharmaceutical	Birth Control	\$56,948.08	14
32	Yaz	Bayer HealthCare	Pharmaceutical	Birth Control	\$56,948.08	**
36	Contour	Bayer HealthCare	Medical Device	Types 1 and 2 Diabetes	\$56,098.08	258
37	Singulair*	Merck	Pharmaceutical	Asthma	\$55,050.22	841
38	Implantable Cardioverter Defibrillators	Medtronic	Medical Device	Cardiac Arrhythmia	\$52,222.39	**
39	Atrial Fibrillation	Medtronic	Medical Device	Atrial Fibrillation	\$50,722.39	**
39	Connected Care	Medtronic	Medical Device	Remote Patient Monitoring	\$50,722.39	**
41	Pradaxa	Boehringer Ingelheim	Pharmaceutical	Stroke Preventative	\$48,455.90	405
42	Avonex	Biogen Idec	Pharmaceutical	Multiple Sclerosis	\$47,104.59	7
43	Vasoview Hemopro 2	Maquet Cardiovascular	Medical Device	Endoscopic Vessel Harvesting	\$46,010.93	**
44	Xeloda	Genentech	Biologic	Adjuvant Colon Cancer	\$45,925.00	**
45	Cymbalta	Eli Lilly	Pharmaceutical	Major Depressive Disorder	\$45,393.95	**
46	Xarelto	Janssen Pharmaceutical R&D, Janssen Pharmaceuticals & Ortho-McNeil-Janssen Pharmaceuticals	Pharmaceutical	Deep Vein Thrombosis	\$44,126.30	80
47	Actemra	Genentech	Biologic	Rheumatoid Arthritis	\$43,425.00	**
48	Lytics	Genentech	Biologic	Central Venous Access device Dysfunction	\$41,925.00	**
48	Pulmozyme	Genentech	Biologic	Cystic Fibrosis	\$41,925.00	1
58	Zelboraf	Genentech	Biologic	Unresectable or Metastatic Melanoma with BRAF Mutation	\$41,925.00	**

Totals:

\$8,149,976.55

4,995

* This product was also among the 50 products associated with the greatest frequency of sampling (see Exhibit 10b).

** No samples were reported as having been associated with this product.

Note: For purposes of this exhibit, when manufacturers disclosed an expenditure in connection with several different products, or a sample containing several different products, the Attorney General's Office assigned the expenditure or sample to each of the products disclosed in connection with the expenditure or sample. Where applicable, primary indication is as according to the FDA.

Exhibit 10b: Top Products – 50 Products with Greatest Number of Samples, 2011

Rank	Product Name	Manufacturer	Product Type	Primary Indication	Number of Times Sampled	Expenditure Total
1	Advair	GlaxoSmithKline	Pharmaceutical	Asthma	3,656	**
2	Abilify	Otsuka America Pharmaceuticals & Bristol-Myers Squibb	Pharmaceutical	Antipsychotic	3,206	\$12,925.08
3	Lipitor	Pfizer	Pharmaceutical	Myocardial Infarction Preventative	3,016	\$295.82
4	Air Optix for Astigmatism	CIBA Vision	Medical Device	Vision Correction	3,000	**
5	Air Optix Aqua Multifocal	CIBA Vision	Medical Device	Vision Correction	2,742	**
6	Biofinity EW	Cooper Vision	Medical Device	Vision Correction	2,686	**
7	Acuvue Oasys for Astigmatism	Vistakon	Medical Device	Vision Correction	2,474	**
8	Purevision Toric	Bausch & Lomb	Medical Device	Vision Correction	2,109	**
9	Air Optix Aqua	CIBA Vision	Medical Device	Vision Correction	1,688	**
9	Proclear Toric	Cooper Vision	Medical Device	Vision Correction	1,688	**
11	Crestor	AstraZeneca	Pharmaceutical	Primary Hyperlipidemia	1,669	\$17,970.00
12	Soflens Multi-Focal	Bausch & Lomb	Medical Device	Vision Correction	1,664	**
13	Dexilant	Takeda Pharmaceuticals	Pharmaceutical	Erosive Esophagitis	1,572	**
14	Similac	Abbott Laboratories	Pharmaceutical	Nutrition	1,426	**
15	Air Optix Night & Day Aqua	CIBA Vision	Medical Device	Vision Correction	1,268	**
16	Acuvue Oasys	Vistakon	Medical Device	Vision Correction	1,267	**
17	Seroquel XR	AstraZeneca	Pharmaceutical	Schizophrenia	1,261	\$10,476.00
18	Dailies Aqua Comfort Plus	CIBA Vision	Medical Device	Vision Correction	1,235	**
19	Colcrys	URL Pharma	Pharmaceutical	Gout Flares	1,228	**
20	Viagra	Pfizer	Pharmaceutical	Erectile Dysfunction	1,184	\$1.20
21	Flovent	GlaxoSmithKline	Pharmaceutical	Asthma	1,164	**
22	Intuniv	Shire	Pharmaceutical	ADHD	1,147	\$3,965.74
23	Celebrex	Pfizer	Pharmaceutical	Osteoarthritis	1,137	\$205.06
24	Systane Ultra	Alcon Laboratories	Pharmaceutical	Eye Care	1,096	**
25	Symbicort	AstraZeneca	Pharmaceutical	Asthma	1,092	\$12,895.00
26	Synthroid	Abbott Laboratories	Pharmaceutical	Hypothyroidism	1,025	\$959.44
27	One-Day Acuvue Moist	Vistakon	Medical Device	Vision Correction	1,023	**
28	Acuvue Advance Toric	Vistakon	Medical Device	Vision Correction	1,018	**
29	Soflens Toric	Bausch & Lomb	Medical Device	Vision Correction	1,004	**

Rank	Product Name	Manufacturer	Product Type	Primary Indication	Number of Times Sampled	Expenditure Total
30	Spiriva	Boehringer Ingelheim & Pfizer	Pharmaceutical	COPD	993	\$28,178.45
31	Nasonex	Merck	Pharmaceutical	Allergic Rhinitis	842	**
32	Singulair*	Merck	Pharmaceutical	Asthma	841	\$55,050.22
32	Vesicare	Astellas Pharma US & GlaxoSmithKline	Pharmaceutical	Overactive Bladder	841	**
34	Maxalt	Merck	Pharmaceutical	Migraine Headaches	839	\$38,290.94
35	Biofinity EW	Cooper Vision	Medical Device	Vision Correction	819	**
36	Ventolin	GlaxoSmithKline	Pharmaceutical	Asthma	809	**
37	Shipper	Abbott Laboratories	Pharmaceutical	Unknown	793	**
37	Strong Moms BRC	Abbott Laboratories	Pharmaceutical	Nutrition	793	**
39	Proclear Compatible	Cooper Vision	Medical Device	Vision Correction	787	**
40	Proclear Multifocal	Cooper Vision	Medical Device	Vision Correction	782	**
41	Veramyst	GlaxoSmithKline	Pharmaceutical	Allergic Rhinitis	766	**
42	Lyrica	Pfizer	Pharmaceutical	Neuropathic Pain Associated with	721	\$2,483.20
43	Plavix	Sanofi-Aventis US & Bristol-Myers Squibb	Pharmaceutical	Acute Coronary Syndrome	710	\$6,696.05
44	Lantus	Sanofi-Aventis US	Pharmaceutical	Types 1 and 2 Diabetes	697	\$32,999.03
45	Systane Balance	Alcon Laboratories	Pharmaceutical	Eye Care	684	**
46	Actos	Takeda Pharmaceuticals	Pharmaceutical	Type 2 Diabetes	668	\$5,767.16
47	Carton	Abbott Laboratories	Pharmaceutical	Unknown	643	**
48	Aciphex	Eisai & Janssen Pharmaceuticals & Ortho-McNeil-Janssen	Pharmaceutical	Gastroesophageal Reflux Disease	634	\$14,444.20
49	One-Day Acuvue Trueye	Vistakon	Medical Device	Vision Correction	633	**
50	Vytorin*	Merck	Pharmaceutical	Hyperlipidemia	631	\$76,362.78

Totals:

65,671 \$319,965.37

* This product was also among the 50 products associated with the greatest total expenditures (see Exhibit 10a).

** No expenditures were reported as having been associated with this product.

Note: For purposes of this exhibit, when manufacturers disclosed an expenditure in connection with several different products, or a sample containing several different products, the Attorney General's Office assigned the expenditure or sample to each of the products disclosed in connection with the expenditure or sample. Where applicable, primary indication is according to the FDA.

Exhibit 11a: Expenditures by Primary Indication of the 50 Products with the Greatest Expenditures, FY08-2011

2011 Rank	Primary Indication	FY08 Expenditure Total	FY09 Expenditure Total	FY10 Expenditure Total	FY11 Expenditure Total	2011 Expenditure Total
1	Exocrine Pancreatic Insufficiency					\$804,251.30
2	Active Ulcerative Proctitis					\$802,251.30
2	H. Pylori Infection					\$802,251.30
4	Diabetes (Type 2 or Types 1 and 2)*	\$402,650.29	\$249,462.85	\$152,177.07	\$897,401.99	\$786,080.24
5	Rheumatoid Arthritis	\$40,008.99	\$16,101.26		\$453,180.95	\$512,350.88
6	Hypercholesterolemia					\$440,728.93
7	Bipolar Disorder and/or Schizophrenia*	\$76,605.66	\$145,028.09	\$23,652.43	\$446,506.05	\$437,971.31
8	HIV				\$446,038.05	\$436,695.68
9	General Anesthesia				\$445,479.05	\$436,484.11
10	Multiple Sclerosis	\$124,341.09	\$151,750.70	\$109,014.36	\$536,255.38	\$399,286.08
11	Hypertension	\$259,220.41	\$116,204.19	\$25,268.07	\$147,713.98	\$279,658.93
12	Birth Control			\$17,809.00	\$143,310.00	\$227,792.32
13	Cardiac Arrhythmia				\$31,119.00	\$170,418.39
14	Hyperlipidemia*				\$136,860.42	\$155,765.61
15	Growth Hormone Deficiency				\$127,479.00	\$127,479.00
16	Orthopaedic				\$29,818.12	\$101,358.00
17	Imaging				\$149,416.09	\$96,993.09
18	Systolic Dysfunction				\$56,719.00	\$83,066.69
19	Leads				\$44,657.54	\$77,987.43
20	Unstable Angina					\$70,266.00
21	Hepatitis C/ Hepatitis C Test		\$18,239.51		\$69,775.00	\$69,775.00
22	Unknown*					\$66,707.00
23	Nausea and Vomiting				\$60,965.59	\$66,490.83
24	Laparoscopic Surgery				\$63,305.33	\$63,305.33
25	Fibromyalgia				\$36,593.32	\$62,789.86

2011 Rank	Primary Indication	FY08 Expenditure Total	FY09 Expenditure Total	FY10 Expenditure Total	FY11 Expenditure Total	2011 Expenditure Total
26	Alzheimer's	\$188,966.05	\$26,733.30			\$59,589.86
27	Asthma*	\$53,903.52		\$13,126.57	\$45,057.59	\$55,050.22
28	Atrial Fibrillation					\$50,722.39
28	Remote Patient Monitoring					\$50,722.39
30	Stroke/Stroke Preventative	\$23,110.66	\$18,775.18		\$38,977.03	\$48,455.90
31	Endoscopic Vessel Harvesting					\$46,010.93
32	Adjuvant Colon Cancer					\$45,925.00
33	Major Depressive Disorder				\$101,588.77	\$45,393.95
34	Deep Vein Thrombosis	\$18,117.00		\$18,154.00		\$44,126.30
35	Central Venous Access Device Dysfunction					\$41,925.00
35	Cycstic Fibrosis			\$16,060.00		\$41,925.00
35	Unresectable or Metastatic Melanoma with BRAF Mutation					\$41,925.00
**	Cholesterol	\$163,450.25	\$108,851.27		\$449,484.05	
**	Attention-Deficit/Hyperactivity Disorder	\$217,983.72	\$139,257.97	\$112,709.10	\$131,420.40	
**	Anticoagulant	\$54,661.22	\$60,528.23		\$83,744.00	
**	Electrophysiology				\$72,604.75	
**	Urinary Incontinence				\$62,785.11	
**	Bone Graft Substitute				\$43,814.32	
**	Coronary Stent System				\$43,437.50	
**	Migraines		\$92,568.41	\$54,792.08	\$39,736.04	
**	Human Papillomavirus				\$38,198.85	
**	Acute Bacterial Skin and Skin Structure Infections				\$35,600.70	
**	Parkinsons Disease		\$19,546.67		\$33,534.28	
**	Surgery				\$33,409.93	
**	Depression/Anxiety	\$242,730.07	\$344,227.30	\$126,245.53		
**	Myeloma and/or Mantle Cell Lymphoma	\$27,767.00	\$21,906.00	\$57,549.00		

Exhibit 11a-2

2011 Rank	Primary Indication	FY08 Expenditure Total	FY09 Expenditure Total	FY10 Expenditure Total	FY11 Expenditure Total	2011 Expenditure Total
**	Emergency Assistance			\$36,012.00		
**	Artificial Lens			\$32,250.00		
**	Pain	\$58,568.93	\$66,162.77	\$29,698.92		
**	Persistent Atrial Fibrillation or Atrial Flutter			\$27,395.00		
**	Acute Coronary Syndrome			\$22,530.53		
**	Diagnostic Radiopaque Media			\$18,750.00		
**	Metastatic Colorectal Cancer			\$18,416.45		
**	Angle Glaucoma or Ocular Hypertension			\$17,695.00		
**	Dry Eye Disease			\$17,666.00		
**	Prevention of Postoperative IOP			\$17,666.00		
**	Ocular Itching			\$17,642.00		
**	Idiopathic Thrombocytopenic Purpura			\$17,120.20		
**	Smoking Cessation			\$16,448.54		
**	Ulcerative Colitis		\$46,410.62	\$14,533.25		
**	End Stage Renal Disease			\$14,344.00		
**	Hunter Syndrome			\$14,344.00		
**	HER2 Overexpressing Breast Cancer			\$13,327.85		
**	Cosmetic Treatment for Face			\$12,375.00		
**	Thrombotic Cardiovascular Events			\$12,285.58		
**	Chronic Iron Overload			\$11,603.27		
**	Crohn's Disease			\$10,297.01		
**	Diabetes (Type 1 Only)	\$42,653.25	\$122,159.72			
**	Overactive Bladder		\$49,555.94			
**	Cronic Obstructive Pulmonary Disease	\$34,824.52	\$49,123.20			
**	Osteoporosis	\$20,097.73	\$36,453.02			
**	Gerd		\$23,229.53			

2011 Rank	Primary Indication	FY08 Expenditure Total	FY09 Expenditure Total	FY10 Expenditure Total	FY11 Expenditure Total	2011 Expenditure Total
**	Bacterial Infections		\$23,196.53			
**	Benign Prostatic Hyperplasia	\$20,610.66	\$23,004.64			
**	Gout		\$16,599.31			
**	Treatment of Opioid Dependence		\$16,388.00			
**	Allergy	\$30,218.92				
**	Sleep Aid	\$20,436.33				

Totals: **\$2,120,926.27** **\$2,001,464.21** **\$1,118,957.81** **\$5,575,987.18** **\$8,149,976.55**

* This indication was also among the indications associated with the top 50 products sampled in 2011. (See exhibit 11b)

** These indications are not associated with the 50 products with greatest expenditures for FY11.

Note: For purposes of this exhibit, when manufacturers disclosed an expenditure in connection with several different products, or a sample containing several different products, the Attorney General's Office assigned the expenditure or sample to each of the products disclosed in connection with the expenditure or sample. Where applicable, primary indication is as according to the FDA.

Exhibit 11b: Samples by Primary Indication of the 50 Products with the Greatest Number of Samples, 2011

Rank	Primary Indication	Number of Times Sampled
1	Vision Correction	27,887
2	Asthma*	7,562
3	Antipsychotic	3,206
4	Myocardial Infarction Preventative	3,016
5	Nutrition	2,219
6	Eye Care	1,780
7	Primary Hyperlipidemia	1,669
8	Allergic Rhinitis	1,608
9	Erosive Esophagitis	1,572
10	Unknown*	1,436
11	Diabetes (Type 2 or Types 1 and 2)*	1,365
12	Bipolar Disorder and/or Schizophrenia*	1,261
13	Gout Flares	1,228
14	Erectile Dysfunction	1,184
15	ADHD	1,147
16	Osteoarthritis	1,137
17	Hypothyroidism	1,025
18	COPD	993
19	Overactive Bladder	841
20	Migraine Headaches	839
21	Neuropathic Pain Associated with Diabetic Peripheral Neuropathy	721
22	Acute Coronary Syndrome	710
23	Gastroesophageal Reflux Disease	634
24	Hyperlipidemia*	631

Totals

65,671

* This indication was also among the indications associated with the top 50 products by expenditures in 2011. (See Exhibit 11a)

Note: For purposes of this exhibit, when manufacturers disclosed an expenditure in connection with several different products, or a sample containing several different products, the Attorney General's Office assigned the expenditure or sample to each of the products disclosed in connection with the expenditure or sample. Where applicable, primary indication is as according to the FDA.

Exhibit 12: Expenditures by Payment Nature with Breakdown of “Other”, 2011

Payment Nature	Expenditure Total	Minimum Expenditure	Maximum Expenditure	Median Expenditure	Number of Expenditures	Number of Recipients
Cash, Check or Credit Card	\$6,090,795.45	\$0.58	\$400,000.00	\$375.00	2,332	329
Educational Materials	\$1,109,719.47	\$0.00	\$127,479.00	\$13.25	2,140	330
Demonstration/Evaluation Unit	\$229,590.91	\$0.00	\$21,667.00	\$135.00	339	112
Other	\$73,085.86	\$0.00	\$63,305.33	\$0.00	1,198	210
Loan of Medical Device	\$0.00	\$0.00	\$0.00	\$0.00	170	32

Totals: **\$7,503,191.70** **--** **--** **\$26.00** **6,179** **--**

Overall Median Expenditure:

Other Payment Nature	Expenditure Total	Minimum Expenditure	Maximum Expenditure	Number of Expenditures
Product	\$70,260.19	\$0.00	\$63,305.33	1,165
Product Training Program	\$2,241.80	\$2,241.80	\$2,241.80	1
Gift	\$345.96	\$16.75	\$79.00	11
Food	\$173.91	\$13.39	\$85.06	5
(Left Blank)	\$64.00	\$2.00	\$10.00	16

Totals: **\$73,085.86** **--** **--** **1,198**

Exhibit 13: Expenditures by Payment Purpose with Breakdown of “Other Fair Market Value Payment” and “Other”, 2011

Purpose of Payment	Expenditure Total	Minimum Expenditure	Maximum Expenditure	Median Expenditure	Number of Expenditures	Number of Recipients
Bona Fide Clinical Trial	\$2,469,268.89	\$0.00	\$202,554.45	\$1,759.83	400	40
(Gross Compensation)	\$2,027,956.75	\$25.00	\$202,554.45	\$2,500.00	270	30
(Expenses)	\$254,940.30	\$0.00	\$79,964.80	\$225.90	90	18
(Salary Support)	\$186,371.84	\$20.00	\$31,349.00	\$2,144.00	40	4
Educational Materials	\$1,091,714.66	\$0.00	\$127,479.00	\$13.00	2,102	300
Gift to Institution/Organization	\$896,205.99	\$0.01	\$385,000.00	\$3.37	270	33
Other Fair Market Value Payment	\$835,503.93	\$2.00	\$400,000.00	\$750.00	432	52
Consulting/Surveys	\$440,223.07	\$0.60	\$46,594.04	\$315.26	276	64
Research Project	\$346,773.39	\$0.00	\$34,059.00	\$1,270.97	112	8
(Gross Compensation)	\$316,356.87	\$150.00	\$34,059.00	\$2,975.00	61	6
(Expenses)	\$16,916.52	\$0.00	\$3,925.80	\$97.98	49	6
(Salary Support)	\$13,500.00	\$5,000.00	\$8,500.00	\$6,750.00	2	2
Faculty Honoraria/Speaker Fee	\$338,539.74	\$24.74	\$8,050.00	\$1,800.00	175	46
Conference Sponsorship	\$272,060.52	\$300.19	\$63,305.33	\$1,000.00	73	23
Other	\$253,902.52	\$0.00	\$70,000.00	\$0.00	1,170	264
Medical Device - Loans, Demos	\$225,220.99	\$0.00	\$21,667.00	\$1.72	503	128
Scholarship/Fellowship	\$166,950.96	\$1,500.00	\$50,000.00	\$5,990.00	10	2
Medical Device Training	\$88,053.79	\$0.58	\$8,431.28	\$52.23	319	129
(Other Expenses)	\$82,983.75	\$0.58	\$8,431.28	\$51.18	316	127
(Compensation)	\$5,070.04	\$270.04	\$2,650.00	\$2,150.00	3	3
Faculty Expense	\$78,773.24	\$1.46	\$8,233.08	\$80.20	337	52
Totals:	\$7,503,191.70	--	--		6,179	--
Overall Median Expenditure:				\$26.00		

Other Fair Market Value Payment Description	Expenditure Total	Number of Expenditures
Database Subscription	\$400,000.00	1
Speaker Fees/Expenses	\$175,117.02	120
Booth/Exhibit Fee	\$99,700.00	110
(Left Blank)	\$55,968.45	50
Medical Education	\$34,093.75	16
Marketing Advisory Board	\$21,568.40	26
Meal/Travel	\$19,473.17	40
Patient Training	\$8,709.44	48
Scientific Poster Presentation	\$6,998.70	2
Conducting Medical Device Training	\$5,500.00	3
Speaker Training	\$4,875.00	13
Site Visit	\$3,000.00	1
Credentialing Fee	\$500.00	2

Totals: \$835,503.93 432

Other Purpose of Payment	Expenditure Total	Number of Expenditures
Medical Education Grant	\$135,070.00	10
Other Research	\$28,220.58	2
Charitable Contribution	\$26,200.00	4
Other Travel	\$25,760.21	40
Marketing	\$21,134.88	3
Other Travel/Meal	\$3,928.03	2
Meal	\$3,317.98	140
Free Distribution to Patients	\$2,998.67	892
Product Training Program	\$2,241.80	1
Speaker Program	\$2,088.00	28
Grant	\$1,000.00	1
Speaker Training	\$939.71	6
(Left Blank)	\$562.62	35
Investigator Meeting	\$202.00	2
Gift	\$146.00	2
Refurbished Product	\$92.04	2

Totals: \$253,902.52 1,170

Exhibit 14a: Minimum Clinical Trial Information, July 1, 2011 – December 31, 2011

Trial Name		Start Date	Manufacturer	Link to National Clinical Trial Registry
1	Phase III: A Study of RoActemra/Actemra (Tocilizumab) Plus DMARDs in Patients With Rheumatoid Arthritis	August, 2004	Genentech	http://clinicaltrials.gov/ct2/show/NCT00720798?term=WA18696&rank=2
2	Reducing Decompensation Events Utilizing Intracardiac Pressures in Patients With Chronic Heart Failure (REDUCEhf)	April, 2006	Medtronic	http://clinicaltrials.gov/ct2/show/NCT00354159
3	Study of Efficacy, Safety and Tolerability of Levodopa-Carbidopa Intestinal Gel in Levodopa-Responsive Parkinson's Subjects	July, 2006	Abbott Laboratories	http://www.clinicaltrials.gov/ct2/show/NCT00357994?term=NCT00357994&rank=1
4	Safety/Efficacy Study of Levodopa-Carbidopa Intestinal Gel in Parkinson's Subjects	August, 2006	Abbott Laboratories	http://www.clinicaltrials.gov/ct2/show/NCT00360568?term=NCT00360568&rank=1
5	Phase IV: A Study of Avastin in Combination With Chemotherapy for Treatment of Colorectal Cancer and Non-Small Cell Lung Cancer (ARIES)	October, 2006	Genentech	http://clinicaltrials.gov/ct2/show/NCT00388206?term=NCT00388206&rank=1
6	Phase II: Nasally Delivered Pulmozyme for Sinusitis in Cystic Fibrosis	December, 2006	Genentech	http://clinicaltrials.gov/ct2/show/NCT00416182?term=Z3297&rank=1
7	109MS301	January, 2007	Biogen Idec	http://clinicaltrials.gov/ct2/show/NCT01064401?term=biogen+idec%2C+205MS301&rank=1
8	A Multicenter, Prospective, Long-term, Observational Registry of Pediatric Patients with Inflammatory Bowel Disease	March, 2007	Johnson & Johnson	http://clinicaltrials.gov/ct2/show/NCT00606346?term=A+Multi-Center%2C+Prospective%2C+Long-term%2C+Observational+Registry+of+Pediatric+Patients+with+Inflammatory+Bowel+Disease+Registry+C0168Z02&state1=NA%3AUS%3AVT&rank=1
9	109MS302	June, 2007	Biogen Idec	http://clinicaltrials.gov/ct2/show/NCT00451451?term=biogen+idec%2C+109MS302&rank=1
10	EFC6260	February, 2008	Sanofi Aventis	http://www.clinicaltrials.gov/ct2/show/NCT00622700
11	A two-arm, randomised, double-blind, placebo-controlled, multicenter phase II study to evaluate safety and tolerability and to explore the neuroprotective effect of atacept as assessed by Optical Coherence Tomography (OCT) in subjects with Optic Neuritis (ON) as Clinically Isolated Syndrome (CIS) over a 36 week treatment course (ATON)	March, 2008	EMD Serono	http://www.clinicaltrials.gov/ct2/show/NCT00624468?term=28156&rank=2
12	RESOLUTE U.S.	July, 2008	Medtronic	http://clinicaltrials.gov/ct2/show/NCT00726453

Trial Name		Start Date	Manufacturer	Link to National Clinical Trial Registry
13	A Randomized, Double-Blind, Placebo-Controlled, Event-Driven Multicenter Study to Evaluate the Efficacy and Safety of Rivaroxaban in Subjects With a Recent Acute Coronary Syndrome	November, 2008	Johnson & Johnson	http://clinicaltrials.gov/ct2/show/NCT00809965?term=Rivaroxaban+AND+acute+coronary+syndrome&rank=1
14	A Phase 2, Multicenter, Multinational, Randomized, Double-blind, Placebo controlled, Parallel-group, Dose-ranging Study Evaluating the Efficacy and Safety of CNTO 888 Administered Intravenously in Subjects with Idiopathic Pulmonary Fibrosis	December, 2008	Johnson & Johnson	http://clinicaltrials.gov/ct2/show/NCT00786201?term=cnto888+AND+pulmonary+fibrosis&rank=1
15	109MS303	February, 2009	Biogen Idec	http://clinicaltrials.gov/ct2/show/NCT00835770?term=biogen+idec%2C+109MS303&rank=1
16	Boston Scientific Trial of the EPIC™ Nitinol Stent System in the Treatment of Atherosclerotic Lesions in Iliac Arteries (ORION)	May, 2009	Boston Scientific	http://clinicaltrials.gov/ct2/show/NCT00896337
17	SPIRIT PRIME Clinical Trial	June, 2009	Abbott Laboratories	http://www.clinicaltrials.gov/ct2/show/NCT00916370?term=NCT00916370&rank=1
18	Evaluation of Dalteparin for Long-term (One Year) Treatment of Blood Clots in Subjects With Cancer (phase IV)	June, 2009	Eisai Corp	http://www.clinicaltrials.gov/ct2/show/NCT00942968?term=Eisai+and+Vermont&rank=3
19	A Phase 2, Multicenter, Randomized, Double-Blind, Parallel-group, Placebo-controlled Study Evaluating the Safety and Efficacy of Treatment With Ustekinumab or Golimumab in Subjects With Chronic Sarcoidosis	September, 2009	Johnson & Johnson	http://clinicaltrials.gov/ct2/show/study/NCT00955279?term=1275148-SCD-2001&rank=1#locn
20	A Phase 2, Randomized, Double-Blind, Placebo-Controlled, Parallel-Group Study to Evaluate the Safety and Efficacy of VX-770 in Subjects Aged 12 Years and Older With Cystic Fibrosis who are Homozygous for the F508del- <i>CFTR</i> Mutation	October, 2009	Vertex Pharmaceuticals	http://www.clinicaltrials.gov/ct2/show/NCT00953706?term=vx-770&rank=9
21	ACT-128800 in Relapsing-remitting Multiple Sclerosis	October, 2009	Actelion	http://clinicaltrials.gov/ct2/show/NCT01006265?term=actelion+and+ms&rank=2
22	A Long-Term, Randomized, Double-Blind Study of the Safety, Tolerability and Efficacy of Acridinium Bromide At Two Dosage Levels When Administered to Patients With Moderate to Severe, Stable Chronic Obstructive Pulmonary Disease	November, 2009	Forest Pharmaceuticals	http://clinicaltrials.gov/ct2/show/record?spons=%22Forest+Laboratories%22&spons_ex=Y&state1=NA%3AUS%3AVT&rank=9
23	Adaptive Cardiac Resynchronization Therapy Study (aCRT)	November, 2009	Medtronic	http://clinicaltrials.gov/ct2/show/NCT00980057

Trial Name		Start Date	Manufacturer	Link to National Clinical Trial Registry
24	The purpose of this study is to evaluate the long- term safety of F2695-SR in the treatment of adults with major depressive disorder	December, 2009	Forest Pharmaceuticals	http://clinicaltrials.gov/ct2/show/record?spons=%22Forest+Laboratories%22&spons_ex=Y&state1=NA%3AUS%3AVT&rank=10
25	28431754DIA3002: A Randomized, Double-Blind, Placebo-Controlled, 3-Arm, Parallel-Group, Multicenter Study to Evaluate the Efficacy, Safety, and Tolerability of Canagliflozin in the Treatment of Subjects With Type 2 Diabetes Mellitus With Inadequate Glycemic Control on Metformin and Sulphonylurea Therapy - The CANTATA-MSU Trial	April, 2010	Johnson & Johnson	http://clinicaltrials.gov/ct2/show/NCT01106625?term=28431754-DIA-3002&rank=1
26	EDUCATE	April, 2010	Medtronic	http://clinicaltrials.gov/ct2/show/NCT01069003
27	(Defeat-HF) - Determining the Feasibility of Spinal Cord Neuromodulation for the Treatment of Chronic Heart Failure	April, 2010	Medtronic	http://clinicaltrials.gov/ct2/show/NCT01112579
28	101JC402	April, 2010	Biogen Idec	http://clinicaltrials.gov/ct2/show/NCT01070836?term=101JC402&rank=1
29	ACT-128800 in Relapsing-remitting Multiple Sclerosis - Extension Study	May, 2010	Actelion	http://clinicaltrials.gov/ct2/show/NCT01093326?term=NCT01093326&rank=1
30	EXCEL Clinical Trial	September, 2010	Abbott Laboratories	http://www.clinicaltrials.gov/ct2/show/NCT01205776?term=NCT01205776&rank=1
31	CHAMPION-PHOENIX Study	September, 2010	The Medicines Company	http://clinicaltrials.gov/ct2/show/NCT01156571
32	Evaluation of the WATCHMAN LAA Closure Device in Patients with Atrial Fibrillation Versus Long Term Warfarin Therapy (PREVAIL)	November, 2010	Boston Scientific	http://www.clinicaltrials.gov/ct2/show/study/NCT01182441
33	Phase II: A Study of Gantenerumab in Patients With Prodromal Alzheimer's Disease	November, 2010	Genentech	http://clinicaltrials.gov/ct2/show/NCT01224106?term=NCT01224106&rank=1
34	A Phase 3, Multi-Center, Multinational, Randomized, Double-Blind, Placebo-Controlled Study To Evaluate The Efficacy And Safety Of MP-376 (Levofloxacin Inhalation Solution; Aeroquin™) In Stable Cystic Fibrosis Patients	November, 2010	Aptalis	http://clinicaltrials.gov/ct2/show/NCT01180634?term=cystic+fibrosis&lead=mpex&rank=1
35	ACT11457	February, 2011	Sanofi Aventis	http://www.clinicaltrials.gov/ct2/show/NCT01312961

Trial Name		Start Date	Manufacturer	Link to National Clinical Trial Registry
36	Phase III: A Safety Study of Xolair (Omalizumab) in Patients With Chronic Idiopathic Urticaria (CIU) Who Remain Symptomatic Despite Treatment With H1 Antihistamines, H2 Blockers, and/or Leukotriene Receptor Antagonists	February, 2011	Genentech	http://clinicaltrials.gov/ct2/show/NCT01264939?term=NCT01264939&rank=1
37	Phase II: A Study of RO5024048 in Combination With Ritonavir-Boosted Danoprevir With or Without Copegus (Ribavirin) in Interferon-Naïve Patients , And With Copegus in Interferon Ineligible And Interferon Intolerant Patients, With Chronic Hepatitis C Genotype 1 (INFORM-SVR)	February, 2011	Genentech	http://clinicaltrials.gov/ct2/show/NCT01278134?term=NCT01278134&rank=1
38	Evaluate the Efficacy and Safety of Once Daily Administration of Atrasentan Tablets (Low and High) Compared to Placebo in Reducing Residual Albuminuria in Type 2 Diabetic Patients With Nephropathy Who Are Treated With the Maximum Tolerated Labeled Dose of a Renin Angiotensin System (RAS) Inhibitor (RADAR)	April, 2011	Abbott Laboratories	http://clinicaltrial.gov/ct2/show/NCT01356849?term=NCT01356849&rank=1
39	SuperNOVA Clinical Stenting Trial	April, 2011	Boston Scientific	http://clinicaltrial.gov/ct2/show/NCT01292928
40	A Randomized, Double-Blind, Placebo Controlled, Parallel-Group, Multicenter, Phase II Study to Evaluate the Efficacy and Safety of MABT5102A in Patients With Mild to Moderate Alzheimer's Disease (ABBY)	April, 2011	Genentech	http://clinicaltrial.gov/ct2/show/NCT01343966?term=NCT01343966&rank=1
41	A Phase III, Multinational, Multicenter, Randomized, Double-Masked, Study for the Treatment of Active, Non-Infectious Uveitis	May, 2011	Santen	http://clinicaltrials.gov/ct2/show/NCT01358266
42	Phase III: A Study of Ocrelizumab in Comparison With Interferon Beta-1a (Rebif) in Patients With Relapsing Multiple Sclerosis	August, 2011	Genentech	http://clinicaltrials.gov/ct2/show/NCT01247324?term=NCT01247324&rank=1

Trial Name		Start Date	Manufacturer	Link to National Clinical Trial Registry
43	A Phase III, Randomized, Double-blind, Placebo-Controlled Study Evaluating the Efficacy, Safety, and Tolerability of Two Fixed Dose Combinations of Acclidinium Bromide/Formoterol Fumarate Compared With Acclidinium Bromide, Formoterol Fumarate and Placebo for 24- Weeks Treatment in Patients With Moderate to Severe, Stable Chronic Obstructive Pulmonary Disease (COPD)	September, 2011	Forest Pharmaceuticals	http://clinicaltrials.gov/ct2/show/study?spons=%22Forest+Laboratories%22&spons_ex=Y&state1=NA%3AUS%3AVT&rank=12
44	The OMEGA Clinical Trial	October, 2011	Boston Scientific	http://clinicaltrials.gov/ct2/show/NCT01419171
45	COMPASS-HF	October, 2011	Medtronic	http://clinicaltrials.gov/ct2/show/NCT00991120?term=COMPASS+HF&rank=1

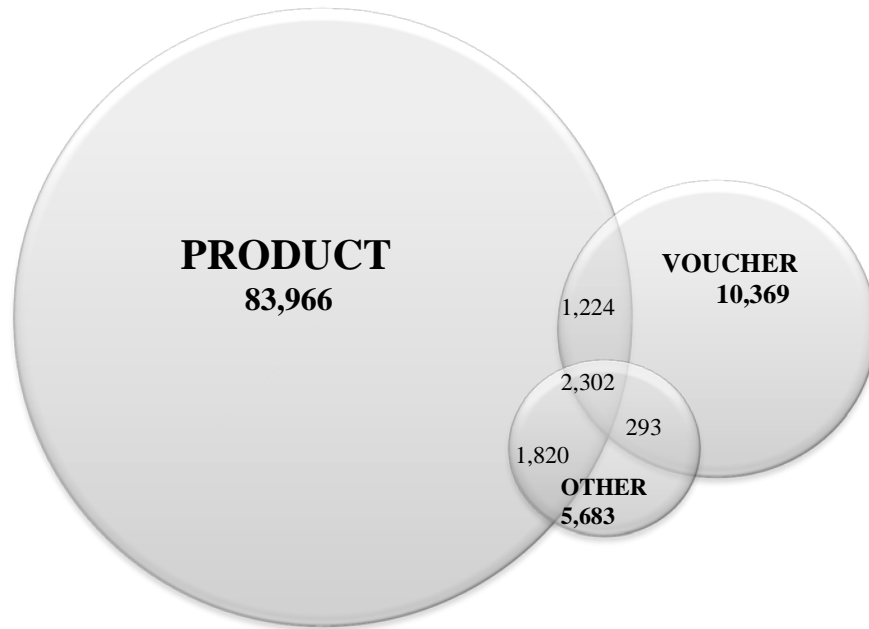
Exhibit 14b: Delayed Clinical Trial Disclosures, 2011

Manufacturer	Recipient	Expenditure Date Range	Expenditure Total	Product Type	Product Name	Indication*
Eli Lilly	Laboratory	2009-2010	\$197,403.00	Pharmaceutical	Semagacestat	n/a
Regeneron Pharmaceuticals	Hospital	2007-2010	\$167,343.67	Biologic	Eylea	Neovascular Age-Related Macular Degeneration (AMD)
Janssen Pharmaceutical Research & Development	University	2010	\$50,887.15	Pharmaceutical	Xarelto	Deep Vein Thrombosis (DVT)
Astellas Pharma US	Hospital	2010	\$18,812.00	Pharmaceutical	Vernakalant	n/a
Biogen Idec	Doctor	2007	\$8,875.00	Biologic	109-ms-302	n/a

Total: \$443,320.82

* Indication refers to the indication listed on the label approved by the FDA in 2011.

Exhibit 15: Contents of Sample by Content Category with Breakdown of “Other”, 2011



Other Sample Type	Sample Description	Total Number of Samples
Educational Material		6,575
Non-Prescribed Item		5,163
Other (Total)		1,864
Other:	Kit/Kit Component	1178
Other:	Carrying Case/User Pack	187
Other:	Lens Case and Product Inserter	186
Other:	Log Book	131
Other:	Instruction Sheet	54
Other:	Package Insert	43
Other:	Nebulizer Kit	19
Other:	Ice Refrigerant/Insulated Container	18
Other:	(Left Blank)	16
Other:	Wall Charger, USB Cable, Meter Tray	12
Other:	Patient Claim Envelope	6
Other:	Blink	4
Other:	Lens Case	4
Other:	Brochure Holder	2
Other:	Housing Unit	2
Other:	Physician Letter	2