

Prescribed Product Disclosures
For Reporting Year 2015

Report of
Vermont Attorney General
William H. Sorrell
October 2016

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Prescribed Product Disclosures:
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I. Summary

This publication is Vermont Attorney General William H. Sorrell's fourteenth report on Prescribed Product Disclosures. It is based upon disclosures of expenditures and sampling activity engaged in during the reporting period of January 1, 2015, through December 31, 2015, Reporting Year 2015 ("RY 2015") by manufacturers of pharmaceuticals, biologics (e.g., vaccines) and medical devices (e.g., artificial hips, hearing aids, and scopes). Vermont's Prescribed Product Disclosure Law, 18 V.S.A. §§ 4631a, 4632, requires the Vermont Attorney General to issue an annual report about the disclosures.¹

Pursuant to Vermont law, the Attorney General may only report samples to the public in aggregate form. Thus, while expenditure disclosures have been posted along with this report on the Attorney General's website, www.ago.vermont.gov, non-aggregate sample disclosures have not.

As always, amendments to laws complicate the comparison of data from year to year. This report is the third to reflect the implementation of the federal Physician Payments Sunshine Provision (§6002) of the Patient Protection and Affordable Care Act (Pub. L. No. 11-148) ("ACA"). Indeed, some of Vermont's disclosure requirements are preempted by the ACA. For instance, Vermont may not require manufacturers to disclose allowable expenditures and permitted gifts to physicians because these items now must be reported to the federal government. However, Vermont's disclosure laws are broader in scope than disclosures under the ACA in several ways. For example, only physicians and teaching hospitals are covered recipients under the federal law. Therefore, manufacturers are required to make all non-preempted disclosures regarding allowable expenditures and permitted gifts to other health care providers or other entities.

¹ 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 these disclosures, the Attorney General makes no representation as to their accuracy or the legality of the prescribed products or the manufacturer's underlying conduct.

As a further complication, the federal law does not prohibit manufacturers from making preempted disclosures to states; it simply prohibits a state from requiring and enforcing preempted disclosures. Thus, while some manufacturers have reported their expenditures to physicians in Vermont voluntarily; an increasing number of manufacturers have not. Because the disclosures to Vermont provide a less-than-full scope of the expenditure activity that took place in 2015, this report focuses on the data regarding samples distributed in Vermont, places less emphasis on the expenditure figures than in the past, and does not purport to compare expenditure data year-to-year.

Manufacturers

The disclosures for RY 2015 reveal that 160 manufacturers reported distributing 53,879 samples and spending approximately 5.4 million dollars² on Vermont health care providers, institutions and organizations. Exhibit 1. Only four manufacturers distributed 3,000 or more samples, and 73 manufacturers disclosed no sample activity at all. Exhibit 1.

The five manufacturers with the highest sample distribution during 2015 were: (1) GlaxoSmithKline, (2) Abbott Laboratories, (3) Pfizer, (4) Alcon Laboratories, and (5) Astrazeneca. Exhibits 1 & 3. GlaxoSmithKline and Pfizer are the only manufacturers which have been in the top five for sampling for all five years of sample reporting. Exhibit 3.³

The percentage of samples reported by the top five manufacturers by samples distribution, as compared with the total number of samples reported by all manufacturers, was 54% in 2015 (compared with 53% in 2014, 60% in 2013, 49% in 2012 and 44% in 2011). Exhibit 3.

Recipients

The number of health care providers accepting at least 250 samples and the total number of samples accepted by them has decreased over the five years of sample reporting, with the lowest number in RY 2014. In RY 2015, a total of 21 health care providers received 8,634 samples, a figure that has decreased markedly from Reporting Year 2011 that indicated 52 health care providers received more than 40,000 samples. Exhibit 4.

A five-year review of health care providers who received 250 or more samples per reporting year shows that physicians specializing in internal medicine received the greatest number of samples. For RY 2015, health care providers who received 250 or more samples identified their specialties or credentials as internal medicine (3,529 samples), physician's

² As noted above, the ACA preempts Vermont from requiring disclosure of certain categories of expenditures and, as a result, this figure may not accurately reflect all Vermont expenditures.

³ Unless otherwise noted the sources for comparisons are annual reports for RY2011-RY2014.

assistant (1,601), family practice (1,554 samples), no specialty (1,027), cardiovascular disease (402), endocrinology, diabetes and metabolism (261) and Advanced Practice Registered Nurse (260). Exhibit 4.

Products

As in years past, pharmaceuticals dominated the percentage of the total number of samples distributed at 56% of prescribed products sampled (compared with 92% in 2014, 73% in 2013, 87% in 2012 and 63% in 2011). Exhibit 2.

Of the top 50 products sampled, 34 (68%) were pharmaceuticals, 10 (20%) were infant formula⁴ and 6 (12%) were medical devices. The 10 products sampled most frequently in 2015 accounted for approximately 23,173 samples, or 43% of all samples distributed in 2015. Exhibits 1 & 5.

Analyzing the RY 2015 primary indications of the 50 products with the greatest number of samples, the three most prevalent indications were infant feeding, stroke, and asthma, which were associated with about 17,661, 5,212 and 3,223 samples respectively. The indications for products that are most frequently sampled vary widely. For example, only two of the top 10 in RY 2015 have been in the top 10 for all years of sampling; 9 indications have been in the top 20 for all years of sampling, while 13 have been in the top 20 for all years they have been sampled. Exhibit 6.

Sample

Of the nearly 54,000 samples distributed in RY 2015 (Exhibit 1), more than 35,000 (65%) contained products, over 15,000 (29%) contained vouchers or coupons for free or reduced price products, and more than 13,000 (25%) contained other items, such as educational materials, non-prescribed items and cases/holders. Approximately 2,300 (4%) samples included two kinds of items (product, vouchers or other), and approximately 4,200 (8%) contained all three kinds of items. Exhibit 7.

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

The Vermont Legislature enacted the Pharmaceutical Marketing Disclosure Law in 2002, and has amended it periodically since then. In 2009, the legislature banned the distribution of most gifts and some expenditures, and 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

⁴ The RY 2014 Report did not include sampling of infant formula.

effective with the 2011 report. The law is now known as the Prescribed Products Gift Ban and Disclosure Law. Minor amendments were made to the law in other years, although the law has not been amended since 2014.

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 types of expenditures are banned in Vermont. In particular, the law bans manufacturers from giving gifts (including food), defined generally as "anything of value provided for free to a health care provider." 18 V.S.A. §§ 4631a(a)(5), (b)(1). Only the following allowable expenditures and permitted gifts 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; and
- 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;
- free prescription or over-the-counter product or financial donations given to free clinics;
- prescribed products distributed through manufacturer patient assistance programs;
- 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;
- some fellowship salary support payments;
- rebates and discounts for prescribed products provided in the normal course of business;
- FDA-approved drug labels; and
- 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 are exempt from disclosure:

- royalties and licensing fees;
- rebates and discounts for prescribed products;
- certain payments relating to clinical trials;
- interviews 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; and
- 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 that manufacturers had been permitted to claim in the past and provided that the disclosures of the distribution of samples as well as other products 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.ago.vermont.gov, disclosures of the distribution of samples 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 provision. 18 V.S.A. § 4632(a)(5)(B). For RY 2015, the Attorney General has several ongoing investigations into violations of the law. Copies of past settlements and payments received, can be found on the Attorney General's Website: www.ago.vermont.gov.

Exhibit 1: Samples and Expenditures by Manufacturer, 2015

Rank by Number of Samples	Manufacturer	Number of Samples	Number of Expenditures**	Expenditure Total**
1	GlaxoSmithKline	9486	37	\$68,681.10
2	Abbott Laboratories	6028	510	\$32,107.09
3	Pfizer Inc	5546	90	\$227,362.00
4	Alcon Laboratories	5462	2	\$2,506.65
5	AstraZeneca	2834	169	\$240,629.01
6	Johnson & Johnson Vision Care	2500	2	\$6,277.00
7	Takeda Pharmaceuticals America	2329	47	\$94,882.42
8	Actavis Pharma	2254	28	\$10,107.00
9	Coopervision	1965		
10	Bristol-Myers Squibb	1733	8	\$27,446.00
11	Merck Sharp & Dohme	1645	172	\$145,654.89
12	Eli Lilly	1525	65	\$1,157,054.00
13	Boehringer Ingelheim	1254	22	\$83,669.00
14	Janssen Pharmaceuticals	1249	91	\$221,676.53
15	Novo Nordisk	1053	65	\$497,892.44
16	Astellas Pharma US	880	13	\$4,788.00
17	Valeant Pharmaceuticals International	804	66	\$37,101.00
18	Sunovion Pharmaceuticals	626		
19	Purdue Pharma	555	1	\$18,398.00
20	sanofi-aventis US	483	27	\$27,148.78
T-21	Daiichi Sankyo	367	6	\$7,539.81
T-21	Otsuka America Pharmaceuticals	367	1	\$650.00
23	LifeScan	350	1	\$271.63
24	Abbvie	247	201	\$137,885.00
25	TEVA Pharmaceutical Industries	221		
26	Iroko Pharmaceuticals	179	49	\$11,735.01
27	Roche Diagnostics	159	8	\$5,748.00
28	Bayer HealthCare	154	6	\$150,887.00
29	Shire North American Group	153	5	\$14,318.85
T-30	Medline Industries	144	6	\$2,016.97

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Rank by Number of Samples	Manufacturer	Number of Samples	Number of Expenditures**	Expenditure Total**
T-30	Galderma Laboratories	144		
32	3M	139	14	\$1,619.90
33	ASCEND Therapeutics US	123	167	\$93.49
34	Mylan Specialty	107	21	\$10,157.64
35	MSD Oss B.V.	71		
36	Depomed	70	15	\$30.00
37	Lundbeck	68	45	\$161.00
38	Wyeth/Pfizer	59	1	\$22,570.00
39	Fisher & Paykel Healthcare	58		
40	Amgen	48	77	\$82,141.43
41	Shionogi	40	15	\$21.91
T-42	Medtronic	35	134	\$58,433.27
T-42	Salix Pharmaceuticals	35	16	\$4,091.00
44	Endo Pharmaceuticals	27		
45	Celgene	20	46	\$45,384.39
46	Genentech	19	20	\$357,705.00
T-47	Smith & Nephew	18	22	\$18,712.14
T-47	Gilead Sciences	18	3	\$18,654.93
T-47	Terumo Medical	18		
50	Insulet	17		
51	PuraCap Pharmaceutical	16		
T-52	LEO Pharma	14	1	\$1,500.00
T-52	EMPI	14		
T-52	Janssen Biotech	12	17	\$43,874.85
55	Ortho Clinical Diagnostics	11	1	\$4.60
T-56	Conmed	9	5	\$45,837.84
T-56	Boston Scientific	9	33	\$41,735.51
T-56	Avanir Pharmaceuticals	9	3	\$32,306.00
T-56	Sigma-Tau Pharmaceuticals	9	1	\$114.12
T-56	B. Braun Medical	9		

Exhibit 1: Samples and Expenditures by Manufacturer, 2015

Rank by Number of Samples	Manufacturer	Number of Samples	Number of Expenditures**	Expenditure Total**
61	Ferring Pharmaceuticals	7	5	\$34,715.69
T-62	Novartis	6	59	\$41,772.72
T-62	Eisai	6	4	\$25,053.00
T-64	Henry Schein	5	16	\$34,872.43
T-64	Hollister	5	1	\$52.49
T-64	Unknown	5		
T-64	Peter Brasseler Holdings	5		
T-68	Jazz Pharmaceuticals	4	2	\$1,500.00
T-68	Keryx Biopharmaceuticals	4		
T-70	Dentsply International	3	1	\$156.00
T-70	Merit Medical Systems	3		
T-70	Dr. Reddy's Laboratories	3		
T-70	EMD Serono	3		
T-70	Oticon Medical	3		
T-75	ConvaTec	2	1	\$21.78
T-75	Ironwood Pharmaceuticals	2		
T-75	Fougera Pharmaceuticals	2		
T-75	Roche Diabetes Care	2		
T-75	Fresenius Medical Care North America	2		
T-75	UCB	2		
T-81	Genzyme	1	13	\$11,998.99
T-81	Leica Microsystems	1	1	\$500.00
T-81	Alkermes	1	41	\$438.05
T-81	Masimo	1		
T-81	Antares Pharma	1		
T-81	B. Braun Interventional Systems	1		
T-81	Biogen Idec	1		
*	Acclarent		58	\$193,370.29
*	Actelion Pharmaceuticals US		31	\$103,369.60
*	Afaxys		116	\$91,516.00

Exhibit 1: Samples and Expenditures by Manufacturer, 2015

Rank by Number of Samples	Manufacturer	Number of Samples	Number of Expenditures**	Expenditure Total**
* 1	Alexion Pharmaceuticals		1	\$79,964.80
* 2	Anacor Pharmaceuticals		15	\$79,120.00
* 3	Animas		19	\$74,139.69
* 4	Arthrex		3	\$66,680.57
* 5	AtriCure		3	\$61,000.00
* 6	Baxalta U.S.		7	\$52,933.27
* 7	BD Rx		5	\$51,743.00
* 8	Benco Dental Supply		15	\$42,487.03
* 9	Biogen		95	\$35,273.54
* 10	Biomet		30	\$32,676.00
* 11	Bio-Rad Laboratories		15	\$30,903.30
* 12	Biosense Webster		60	\$22,536.98
* 13	Bioventus		6	\$17,084.88
* 14	Cardinal Health		13	\$16,434.32
* 15	Chiesi USA		36	\$15,817.19
* 16	Cochlear Americas		3	\$13,639.12
* 17	Cook Medical		3	\$9,692.00
* 18	DePuy Orthopaedics		23	\$9,576.91
* 19	Draeger Medical		4	\$6,454.59
* 20	Edwards Lifesciences		68	\$6,338.56
* 21	EMD Millipore		2	\$6,169.79
* 22	Emergent BioSolutions		2	\$5,859.32
* 23	EndoChoice		103	\$4,475.16
* 24	Endologix		3	\$4,038.44
* 25	EndoShape		2	\$4,024.00
* 26	Ethicon		12	\$3,935.00
* 27	GE Healthcare		2	\$3,500.00
* 28	Getinge Group		12	\$3,484.61
* 29	Grifols USA		10	\$3,243.41
* 30	Hill-Rom		8	\$3,190.05

Exhibit 1: Samples and Expenditures by Manufacturer, 2015

Rank by Number of Samples	Manufacturer	Number of Samples	Number of Expenditures**	Expenditure Total**
* 1	Hospira Worldwide		16	\$3,107.51
* 2	Impax Laboratories		3	\$3,064.00
* 3	Indivior		1	\$2,987.00
* 4	Intuitive Surgical		1	\$2,682.66
* 5	Janssen Research & Development		1	\$2,638.40
* 6	Janssen Therapeutics		1	\$2,423.50
* 7	Mallinckrodt Pharmaceuticals		1	\$2,151.99
* 8	McKesson Medical-Surgical		2	\$2,000.00
* 9	McKesson Medical-Surgical Minnesota Supply		12	\$1,900.00
* 10	McKesson Technologies		12	\$1,746.00
* 11	Medimmune		8	\$1,636.83
* 12	Medivation		7	\$1,598.23
* 13	Mentor Worldwide		4	\$1,550.00
* 14	Millennium Pharmaceuticals		2	\$1,528.00
* 15	Mylan Institutional		3	\$1,302.12
* 16	Mylan Pharmaceuticals		1	\$1,142.53
* 17	NxStage Medical		5	\$1,105.00
* 18	Olympus Corporation of the Americas		18	\$1,055.00
* 19	Osteomed		1	\$1,010.68
* 20	Oticon		1	\$689.00
* 21	Pacira Pharmaceuticals		2	\$622.59
* 22	Pharmacyclics		1	\$614.86
* 23	Philips Healthcare, a Division of Philips Electronics North America Corp.		3	\$599.00
* 24	Retrophin		7	\$505.00
* 25	Roche Health Solutions		1	\$400.00
* 26	Sanofi Pasteur		1	\$250.00
* 27	Seattle Genetics		1	\$200.00
* 28	Sobi		1	\$166.81
* 29	Starkey Hearing Technologies		2	\$150.00
* 30	Straumann Manufacturing		1	\$112.80

Exhibit 1: Samples and Expenditures by Manufacturer, 2015

Rank by Number of Samples	Manufacturer	Number of Samples	Number of Expenditures**	Expenditure Total**
* 1	Stryker		1	\$101.93
* 2	TEI Biosciences		1	\$98.95
* 3	TEI Medical		5	\$85.35
* 4	Teva Pharmaceuticals		2	\$71.87
* 5	The Medicines Company		1	\$67.91
* 6	Vapotherm		1	\$40.00
* 7	Vertex Pharmaceuticals		1	\$30.00
* 8	ViiV Healthcare		2	\$19.50
* 9	Vivus		7	\$13.39
* 10	W.L. Gore & Associates		19	\$0.00

Totals:

53,879

3,444

\$5,366,803.18

* Manufacturer did not disclose any samples.

** Note that because the Affordable Care Act partially preempts Vermont's ability to require expenditure disclosures, the data in these columns is incomplete.

Exhibit 2: Samples and Expenditures by Product Type, 2015

Product Type	Number of Samples	Percent Number of Samples	Number of Expenditures	Percent Number of Expenditures	Expenditure Total*	Percent Expenditure Total
Pharmaceuticals	43,614	56.23%	2,366	51.59%	\$6,264,816.00	70.63%
Infant Formula	21,589	27.83%	0	0	\$0.00	0.00%
Medical Devices	11,369	14.66%	1,890	41.21%	\$1,043,722.69	11.77%
Medical Food	608	0.78%	0	0	\$0.00	0.00%
Combination Product	149	0.19%	26	0.57%	\$4,333.96	0.05%
Biologics	147	0.19%	304	6.63%	\$1,557,608.91	17.56%
Medical Equipment/Supplies	87	0.11%	0	0	\$0.00	0.00%

Totals:	77,563		4,586		\$8,870,481.55	
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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 products, the Attorney General's Office assigned the expenditure or sample to each of the products disclosed with the expenditure or sample.

*Note that because the Affordable Care Act partially preempts Vermont's ability to require expenditure disclosures, the data in these columns is incomplete.

Exhibit 3: Top Five Manufacturers with Most Samples, 2011-2015

Rank by Number of Samples	2011	2012	2013	2014	2015
1	CIBA Vision	AstraZeneca	AstraZeneca	Pfizer	GlaxoSmithKline
2	Cooper Vision	GlaxoSmithKline	GlaxoSmithKline	GlaxoSmithKline	Abbott Laboratories
3	GlaxoSmithKline	Eli Lilly	Pfizer	AstraZeneca	Pfizer
4	Pfizer	Pfizer	Allergan	Forest Laboratories	Alcon Laboratories
5	Vistakon	Forest Pharmaceuticals	Abbott Laboratories	Eli Lilly and Company	Astrazeneca
Number of Samples for Top 5 Manufacturers	47,052	35,864	32,172	23,914	29,356
Percentage of Overall Sample Total Attributable to Top 5 Manufacturers	44%	49%	60%	53%	54%

Exhibit 4: Samples by Specialty or Credential for Individual Health Care Providers who Received 250 or More Samples, 2011-2015

Specialty or Credential	2011		2012		2013		2014		2015	
	# of Samples	Rank	# of Samples	Rank	# of Samples	Rank	# of Samples	Rank	# of Samples	Rank
Internal Medicine	7,423	2	8,363	1	7,763	1	3,497	1	3,529	1
Physician Assistant	2,011	4	2,597	3	1,565	3	1,230	3	1,601	2
Family Practice	6,136	3	6,086	2	4,720	2	2,721	2	1,554	3
No Specialty									1,027	4
Cardiovascular Disease	638	7	809	5	574	7	390	4	402	5
Endocrinology Diabetes and Metabolism	836	6	404	7	377	8	259	5	261	6
Advanced Practice Registered Nurse (APRN)	279	8	626	6	900	5			260	7
Optometrist	21,831	1	359	8	1,225	4				
Critical Care Medicine	1,185	5	1,158	4	680	6				
Allergy and Immunology			255	11	263	9				
Ophthalmology					257	10				
Psychiatry			275	9	252	11				
Pediatrics			270	10						

Total Number of Samples:	40,339	21,202	18,576	8,097	8,634
Total Recipients:	52	43	40	18	21

Note: In 2012 the Vermont Legislature amended the Prescribed Product Gift Ban and Disclosure Law to exempt prescription eyewear.

Exhibit 5: Top Products - 50 Products with Greatest Number of Samples, 2015

Rank	Product Name	Manufacturer	Product Type	Primary Indication	Number of Samples
1	Sim Sens 7.6oz Pwd	Abbott Laboratories	Infant Formula	Infant Formula	4,206
2	Eliquis	Bristol-Myers Squibb Company	Pharmaceuticals	Stroke	3,853
3	Similac Adv Es 8Oz Powder	Abbott Laboratories	Infant Formula	Infant Formula	3,313
4	Alimentum Adv 8Oz Pwd	Abbott Laboratories	Infant Formula	Infant Formula	2,550
5	Advair	GlaxoSmithKline	Pharmaceuticals	Asthma	2,218
6	Sim Ttl Comfort 7.6oz Pwd	Abbott Laboratories	Infant Formula	Infant Formula	1,856
7	Similac For Supp 2Oz Liquid	Abbott Laboratories	Infant Formula	Infant Formula	1,673
8	Viagra	Pfizer	Pharmaceuticals	Erectile Dysfunction	1,282
9	Opti-Free Pure Moist	Alcon Laboratories	Medical Devices	Contact Solution	1,172
10	Crestor	Astrazeneca	Pharmaceuticals	Hyperlipidemia	1,050
11	Similac Adv Nongmo 8Oz Powder	Abbott Laboratories	Infant Formula	Infant Formula	1,037
12	Cialis	Eli Lilly	Pharmaceuticals	Erectile Dysfunction	895
13	Sim Sens Isomil Soy 8Oz Pwd	Abbott Laboratories	Infant Formula	Infant Formula	882
14	Xarelto	Janssen Pharmaceuticals	Pharmaceuticals	Stroke	854
15	Multiple Products	Janssen Pharmaceuticals	Pharmaceuticals	Infant Formula	841
16	Spiriva	Boehringer Ingelheim	Pharmaceuticals	Chronic Obstructive Pulmonary Disease	791
17	Dexilant	Takeda Pharmaceuticals America	Pharmaceuticals	Erosive Esophagitis	740
18	Lyrica	Pfizer Inc	Pharmaceuticals	Neuropathic Pain	721
19	Levitra	GlaxoSmithKline	Pharmaceuticals	Erectile Dysfunction	699
20	Symbicort	Astrazeneca	Pharmaceuticals	Asthma	618
21	Systane Balance	Alcon Laboratories	Pharmaceuticals	Dry Eye	613
22	Linzess	Actavis Pharma	Pharmaceuticals	Irritable Bowel Syndrome	596
23	Bystolic	Actavis Pharma	Pharmaceuticals	Hypertension	591
24	Systane Ultra	Alcon Laboratories	Pharmaceuticals	Contact Solution	570
25	Latuda	Sunovion Pharmaceuticals	Pharmaceuticals	Schizophrenia	566
26	Similac Neosure 13.1oz	Abbott Laboratories	Infant Formula	Infant Formula	529
27	Brintellix	Takeda Pharmaceuticals America	Pharmaceuticals	Major Depressive Disorder	506
28	Eliquis	Pfizer	Pharmaceuticals	Stroke	505
29	Nexium	Pfizer	Pharmaceuticals	Gastroesophageal Reflux Disease (GERD)	500
30	Breo	GlaxoSmithKline	Pharmaceuticals	Chronic Obstructive Pulmonary Disease	498
31	Oxycontin	Purdue Pharma	Pharmaceuticals	Pain	495
32	Colcrys	Takeda Pharmaceuticals America	Pharmaceuticals	Gout	471

Exhibit 5: Top Products - 50 Products with Greatest Number of Samples, 2015

Rank	Product Name	Manufacturer	Product Type	Primary Indication	Number of Samples
33	Celebrex	Pfizer	Pharmaceuticals	Osteoarthritis	436
34	Optigro	Abbott Laboratories	Infant Formula	Infant Formula	421
35	Anoro Ellipta	GlaxoSmithKline	Pharmaceuticals	Chronic Obstructive Pulmonary Disease	416
36	CCare+W/Hydraglyde 3Oz Sk/Lc-	Alcon Laboratories	Medical Devices	Contact Solution	406
37	Flovent	GlaxoSmithKline	Pharmaceuticals	Asthma	387
38	Belsomra	Merck Sharp & Dohme	Pharmaceuticals	Insomnia	385
39	Viibryd	Actavis Pharma	Pharmaceuticals	Depressive Disorder	366
40	Strattera	Eli Lilly	Pharmaceuticals	ADHD	356
41	Similac For Spit Up 7.6oz Pwd	Abbott Laboratories	Infant Formula	Infant Formula	353
42	Amitiza	Takeda Pharmaceuticals America	Pharmaceuticals	Chronic Idiopathic Constipation	337
43	Advil	Pfizer	Pharmaceuticals	Pain	314
44	Cbv Clear Care	Alcon Laboratories	Medical Devices	Contact Solution	297
45	Multi-Use Nipple & Ring	Abbott Laboratories	Medical Devices	Infant Care	292
46	Januvia	Merck Sharp & Dohme	Pharmaceuticals	Type 2 Diabetes	286
47	Abilify	Otsuka America Pharmaceuticals	Pharmaceuticals	Schizophrenia	282
48	Control Solution	Abbott Laboratories	Medical Devices	Glucose Testing	277
49	Lancets	Abbott Laboratories	Medical Devices	Glucose Testing	266
50	Chantix	Pfizer	Pharmaceuticals	Smoking Cessation	256

Exhibit 6: Samples by Primary Indication of the top 50 Products with the Greatest Number of Samples, 2011 - 2015

Primary Indication	2011		2012		2013		2014		2015	
	# of Samples	Rank	# of Samples	Rank	# of Samples	Rank	# of Samples	Rank	# of Samples	Rank
Infant Feeding (Infant Formula)					2,029	9			17,661	1
Stroke					1,348	14	1,175	12	5,212	2
Asthma	7,562	2	7,017	2	8,480	1	4,497	1	3,223	3
Eye Care	1,780	7	1,034	17	1,861	11	875	18	3,058	4
Erectile Dysfunction	1,184	14	5,308	3	1,788	13	3,610	2	2,876	5
Chronic Obstructive Pulmonary Disease	993	18	2,011	9	2,483	7	767	19	1,705	6
Hyperlipidemia	2,300	5	4,204	5	4,970	2	2,099	5	1,050	7
Bipolar Disorder and/orSchizophrenia	1,261	12	4,516	4	2,083	8	2,547	3	848	8
Pain					771	21	957	17	809	9
Erosive Esophagitis	1,572	9	1,476	14	836	20	721	20	740	10
Neuropathic Pain	721	21	997	18	882	17	706	21	721	11
Irritable Bowel Syndrome					869	18	676	22	596	12
Hypertension			4,054	6	2,805	6	1,668	6	591	13
Blood Glucose Testing			491	24	1,789	12	1,310	10	543	14
Major Depressive Disorder							1,098	15	506	15
Gastroesophageal Reflux Disease (GERD)	634	23	2,994	8	3,128	5	1,372	8	500	16
Gout	1,228	13	1,053	16	1,228	16	1,127	13	471	17
Osteoarthritis	1,137	16	1,836	10	1,276	15	1,503	7	436	18
Insomnia			597	22					385	19
Depressive Disorder			7,721	1	1,874	10	1,105	14	366	20
ADHD	1,147	15	1,496	13	862	19	1,304	11	356	21
Chronic Idiopathic Constipation									337	22
Infant Care									292	23
Diabetes	1,365	11	3,014	7	3,306	4	2,376	4	286	24
Smoking Cessation			449	26			477	23	256	25
Various: Multiple Products	1,436	10	950	19	3,378	3	1,336	9		
Bronchospasm			546	23	732	22	1,073	16		
Overactive Bladder	841	19	1,678	11	489	26	434	24		
Nonvalvular Atrial Fibrillation							351	25		
Allergic Rhinitis	1,608	8	837	20	651	24	348	26		

Exhibit 6: Samples by Primary Indication of the top 50 Products with the Greatest Number of Samples, 2011 - 2015

Primary Indication	2011		2012		2013		2014		2015	
	# of Samples	Rank	# of Samples	Rank	# of Samples	Rank	# of Samples	Rank	# of Samples	Rank
Reversible Obstructive Airway Disease							333	27		
Glaucoma							297	28		
Alzheimer's Disease			1,545	12	684	23				
Fibromyalgia			1,339	15						
Migraine Headaches	839	20	663	21						
Primary Hypogonadism			479	25						
Philadelphia Chromosome Positive Chronic Myeloid Leukemia			391	27						
Antipsychotic	3,206	3								
Myocardial Infarction Preventative	3,016	4								
Nutrition	2,219	6								
Hypothyroidism	1,025	17								
Acute Coronary Syndrome	710	22								

Totals:

37,784

58,696

50,602

36,142

43,824

Exhibit 7: Contents of Sample by Category, 2011-2015

2011		2012		2013		2014		2015	
Product		Product		Product		Product		Product	
Product Only	78,620	Product Only	48,607	Product Only	46,862	Product Only	28,786	Product Only	29,607
Product and Vouchers	11,224	Product and Vouchers	893	Product and Vouchers	105	Product and Vouchers	994	Product and Vouchers	703
Product and Other	1,820	Product and Other	2,946	Product and Other	2,107	Product and Other	786	Product and Other	720
Product, Vouchers and Other	2,302	Product, Vouchers and Other	910	Product, Vouchers and Other	1,112	Product, Vouchers and Other	17	Product, Vouchers and Other	4,216
Total	83,966	Total	53,356	Total	50,186	Total	30,583	Total	35,246
Vouchers		Vouchers		Vouchers		Vouchers		Vouchers	
Vouchers Only	6,550	Vouchers Only	15,446	Vouchers Only	16,361	Vouchers Only	12,858	Vouchers Only	9,804
Vouchers and Product	1,224	Vouchers and Product	893	Vouchers and Product	105	Vouchers and Product	994	Vouchers and Product	703
Vouchers and Other	293	Vouchers and Other	336	Vouchers and Other	246	Vouchers and Other	243	Vouchers and Other	873
Vouchers, Product and Other	2,302	Vouchers, Product and Other	910	Vouchers, Product and Other	1,112	Vouchers, Product and Other	17	Vouchers, Product and Other	4,216
Total	10,369	Total	17,585	Total	17,824	Total	14,112	Total	15,596
Other		Other		Other		Other		Other	
Other Only	1,268	Other Only	3,617	Other Only	1,164	Other Only	1,865	Other Only	7,821
Other and Vouchers	293	Other and Vouchers	336	Other and Vouchers	246	Other and Vouchers	243	Other and Vouchers	873
Other and Product	1,820	Other and Product	2,946	Other and Product	2,107	Other and Product	786	Other and Product	720
Product, Vouchers and Other	2,302	Product, Vouchers and Other	910	Product, Vouchers and Other	1,112	Product, Vouchers and Other	17	Product, Vouchers and Other	4,216
Total	5,683	Total	7,809	Total	4,629	Total	2,911	Total	13,630