

Prescribed Product Disclosures:

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

March 30, 2012

I. Summary

This is the ninth report of Vermont Attorney General William H. Sorrell on Prescribed Product Disclosures. It is based upon disclosures of payments made during the period of July 1, 2010, through June 30, 2011 (“FY11”), by manufacturers of pharmaceutical, biologic and medical device products. Vermont’s Prescribed Product Disclosure Law, 18 V.S.A. §§ 4631a, 4632, required manufacturers to file these disclosures with the Vermont Attorney General’s Office by October 1, 2011, and requires the Vermont Attorney General to issue a report about the disclosures by April 1, 2012.¹

Like the FY10 Report, this report reflects the substantial amendments made to Vermont’s law in 2009. Among other changes, the amendments largely prohibit manufacturers from giving gifts to health care providers and require reporting by manufacturers of biologics and medical devices as well as reporting by pharmaceutical manufacturers, which has been mandated since 2002. The amendments also require clinical trial and research expenditures to be reported. Further, the amendments eliminated the trade secrets exemption to public disclosure. As a result, all information submitted to the Attorney General’s Office for FY11 has been posted along with this report on the Attorney General’s Website: www.atg.state.vt.us.²

To some extent, these changes in the law complicate the comparison of FY10 and FY11 data to that of prior years. For example, the expanded definition of manufacturer and the new requirement that clinical trial and research expenditures be reported means that the FY10 and FY11 reporting captures a wider range of the dollars spent on health care than in prior years. Thus, comparison with prior years’ exclusively pharmaceutical and exclusively marketing-related data is difficult. Moreover, both the ban on gifts and the elimination of trade secret protection may have caused manufacturers to decrease the amount of money they spent on marketing products to Vermont health care providers. Notably, the ban includes food, which accounted for over 27% of FY08. Further, for the first time in FY10, the Attorney General’s

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 and expenditures have not had an opportunity to review these disclosures or confirm their accuracy.

² This report does not reflect the 2009 amendment requiring manufacturers to disclose information regarding the distribution of samples of prescribed products, however. That amendment applies to the distribution of samples made on and after January 1, 2011, and will be reflected in future prescribed product reports.

Office allowed manufacturers to report certain expenditures in the aggregate, so that some expenditures that would have, in the past, been attributed to a health care provider or institution were not reported in connection with a specific recipient for FY10 or FY11.

Manufacturers and Expenditures

According to the FY11 disclosures, 154 manufacturers reported spending approximately 5.6 million dollars in direct payments to Vermont health care providers, institutions and organizations. Only 14 manufacturers had expenditures greater than \$100,000, and 116 manufacturers had expenditures of less than \$20,000. The maximum single expenditure was \$400,000, with the next highest at approximately \$130,000 and \$100,000. These expenditures were for educational materials and clinical trials, respectively. Exhibits 1 and 7.

Expenditures on pharmaceutical products accounted for approximately 4 million of the 5.6 million dollar total, and were made by 64 manufacturers. Thus, 42% of the manufacturers accounted for 70% of expenditures. Exhibits 1, 3 and 4.

Expenditures for pharmaceuticals also dominated the percent of total dollars reported (77% as compared with 20% for medical devices and 3% for biologics). However, more than half of the total number of expenditures were for medical devices (53% as compared with 43% for pharmaceuticals and 4% for biologics). Exhibit 2.

The FY11 pharmaceutical expenditure total of roughly 4 million dollars may appear to represent a return to the level of spending reported in FY04. However, excluding payments made on clinical trials and research puts FY11 expenditures at approximately 2.2 million dollars, a figure at the low end 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.

The number of manufacturers reporting pharmaceutical expenditures for FY11 (64) rose slightly from the level reported in FY10 (58), as did the total number of manufacturers reporting expenditures (154 in FY11 as compared with 141 in FY10). The total number of expenditures also rose slightly from 3,122 in FY10 to 4,277 in FY11; however, the FY11 figure still represents a 73% decrease from a high of 15,880 expenditures in FY08. Exhibits 4 and 5.

The five manufacturers with the highest total expenditures to Vermont health care providers, institutions and organizations during FY11 were:

- Abbot Laboratories
- Novartis Pharmaceuticals
- GlaxoSmithKline
- Eli Lilly
- Medtronic

Of these, Eli Lilly was in the top five manufacturers for all four of the previous fiscal years, Novartis Pharmaceuticals for three of the last four fiscal years, and GlaxoSmithKline for two of the prior three fiscal years. Abbot Laboratories and Medtronic appear in the top five for the first time in FY11, and also represent the first manufacturers ranked in the top five to have reported expenditures other than solely pharmaceutical expenditures. For FY11, Abbot Laboratories

reported pharmaceutical and medical device expenditures and Medtronic reported medical device and biologic expenditures. Exhibits 1 and 6.

The percentage of payments reported by the top five manufacturers, as compared with the total amount of expenditures reported, continued to drop in FY11 to 39%. In FY09 and FY10, the top five manufacturers were responsible for 47% of total expenditures, which represented a decrease from prior levels of 52% (FY08) and 56% (FY07). Exhibit 6.

Recipients

Approximately 42% of the expenditures made in FY11, or 2.4 million dollars, went to clinical trials and research. Of the balance, recipients of the highest percentage of expenditures in FY11 were doctors (23%), followed by recipients in the aggregate and professional, educational, or patient organizations (12% each), and academic institutions (5%). Exhibit 7.

Excluding expenditures made in connection with clinical trials, the number of health care providers receiving \$3,000 or more rose from 44 in FY10 to 56 in FY11, a total increase of approximately 27%. The total dollars received by this group rose from approximately \$740,000 to over 1.3 million. The greatest amount of expenditures to the 56 health care providers who received \$3,000 or more in FY11 went to doctors holding ionizing radiation privileges. In addition to this group, health care providers who received \$3,000 or more individually and over \$60,000 as a group were doctors identifying their specialties as: neurology, radiology, psychiatry, geriatric medicine, internal medicine, orthopaedic surgery and medical oncology. Of those, neurology, psychiatry, geriatric medicine and medical oncology were among the top five recipient specialties in FY10. Doctors holding ionizing radiation privileges were among the top five recipient specialties in FY08 and FY09, but not FY10. Exhibit 8.

In FY11, nurses (Registered Nurses and Advance Practice Registered Nurses) who received \$3,000 or more each received a total of roughly \$57,000, a slight (8%) increase from the FY10 level of \$53,000. Expenditures to Advance Practice Registered Nurses who received \$3,000 or more rose approximately 35% from about \$32,000 in FY10 to about \$43,000 in FY11, while expenditures to Registered Nurses receiving \$3,000 or more dropped 34% from approximately \$21,000 in FY10 to nearly \$14,000 in FY11. Exhibit 8.

Excluding expenditures associated with clinical trials, the largest amount of expenditures associated with any single individual recipient in FY11 was approximately \$149,000 to a radiologist, all of which was for consulting and surveys. The total expenditures for that individual are about 153% higher than the total received by the recipient with the highest expenditures in FY10 (approximately \$59,000), and 27% higher than the recipient with the highest expenditures in FY09 (approximately \$117,000). The top individual recipient in FY10 was a doctor of geriatric medicine; in FY09, the top recipient was a psychiatrist. Exhibit 9.

Products

Fifty products were associated with over \$28,000 each in expenditures in FY11. Of those, 37 (74%) were pharmaceutical products, 12 (24%) were medical devices, and 1 (2%) was a biologic. The top ten products for FY11, and their manufacturers and indications, were as follows:

<u>Product</u>	<u>Manufacturer</u>	<u>Primary Indication per FDA</u>
1. Humira	Abbot Laboratories	Rheumatoid Arthritis
2. TriCor	Abbot Laboratories	Hypercholesterolemia
3. Depakote	Abbot Laboratories	Bipolar Disorder
4. Kaletra	Abbot Laboratories	HIV
5. Ultane	Abbot Laboratories	General Anesthesia
6. Gilenya	Novartis Pharmaceuticals	Multiple Sclerosis
7. Victoza	Novo Nordisk	Type 2 Diabetes
8. NovoLog	Novo Nordisk	Types 1 and 2 Diabetes
9. Levemir	Novo Nordisk	Types 1 and 2 Diabetes
10. NovoLog Mix	Novo Nordisk	Types 1 and 2 Diabetes

The top ten products of FY11 were all pharmaceutical, and accounted for approximately 3.3 million dollars in spending (including expenditures for clinical trials), or approximately 34% of overall spending. Exhibits 2 and 10.

Looking only at the 50 products with the greatest expenditures, approximately 16% of those expenditures were associated with drugs used for treating Type 2 Diabetes or both Type 1 and Type 2 Diabetes. This was the most prevalent indication for the top 50 products in FY10 as well. Expenditures for products with the second through fifth most prevalent indications in FY11 were: Multiple Sclerosis, Rheumatoid Arthritis, Cholesterol and Bipolar Disorder and/or Schizophrenia. Of those, only Multiple Sclerosis was among the five most prevalent indications in FY10; Rheumatoid Arthritis and Cholesterol were not among the primary indications of the top 50 products in FY10, and Bipolar Disorder and/or Schizophrenia was ranked twelfth. Exhibit 11.

Nature and Purpose of Expenditure

Approximately 85% of all expenditures in FY11 were in the form of cash or check to recipients, the same proportion that was reported in FY10. Approximately \$676,000 of FY11 expenditures took the form of educational materials. This represents a 26% increase from the FY10 level of \$535,000. However, as a proportion of total expenditures, educational materials rose only slightly from 11% in FY10 to 12% in FY11. In FY11, manufacturers loaned 113 medical devices to 18 recipients. Per Office guidance, no value is placed on the loan of medical devices. Exhibit 12.

Manufacturers reported that the purpose of roughly 1.7 million dollars (or 31%) of FY11 spending was for clinical trials. Manufacturers also reported spending more than \$500,000 each on other fair market value payments (14%), educational materials (12%), and for research projects (11%). Exhibit 13.

Clinical Trial Expenditures

Manufacturers reported that the 1.7 million dollars spent on clinical trials were associated with 75 separate products. (This total is the combination of gross compensation, salary support, and other expenses.) This is roughly an 11% decrease from the FY10 clinical trial total of 1.9 million dollars. However, manufacturers also disclosed that they made expenditures in FY11

related to 53 additional clinical trials being conducted in Vermont; because those expenditures are eligible for delayed disclosure, manufacturers will not disclose the dollar amount of expenditures associated with those trials until a future reporting period. Exhibits 13 and 14.

II. Description of Vermont's Prescribed Product Disclosure Law

The Vermont Legislature enacted the Pharmaceutical Marketing Disclosure Law in 2002, and amended it in 2004, 2005, 2006, and 2007. In 2009, with the addition of mandatory reporting for expenditures on biologics and medical devices as well as expenditures relating to clinical trials and research, it became the Prescribed Products Disclosure Law. Minor amendments were made to the law in 2010. Additional minor amendments to the law have been proposed in the current legislative session, and, as of the date of this report, are still pending.

The law in effect for the expenditures 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 permissible payments made to Vermont health care providers and institutions. 18 V.S.A. § 4632(a)(1).

As described in the summary, the law changed dramatically in 2009 to ban many kinds of expenditures. 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).

Permissible 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 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).

For purposes of FY11, the following allowable expenditures and permissible gifts were exempt from disclosure:

- royalties and licensing fees
- rebates and discounts for prescribed products
- certain payments relating to clinical trials
- samples of prescribed products for free distribution to patients
- interview or health care expenses
- 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 addition, in 2009, the legislature eliminated the trade secret exemption which manufacturers had been permitted to claim in the past. *See* 18 V.S.A. § 4632(a)(5). Consequently, the data which was submitted to the Attorney General's Office, and which formed the basis of this report, is available to the public on the Attorney General's Website: www.atg.state.vt.us.

Exhibit 1: Expenditures by Manufacturer, FY11

Rank	Manufacturer	Expenditure Total	Pharmaceutical Expenditure Total	Minimum Expenditure	Maximum Expenditure	Number of Expenditures	Number of Pharmaceutical Expenditures	Number of Biologic Expenditures	Number of Medical Device Expenditures	Number of Recipients*
1	Abbott Laboratories	\$551,630.35	\$507,734.06	\$1.00	\$400,000.00	882	210		672	33
2	Novartis Pharmaceuticals	\$464,422.61	\$464,422.61	\$0.82	\$101,376.00	123	123			13
3	GlaxoSmithKline	\$406,618.48	\$406,618.48	\$73.21	\$56,858.47	80	80			11
4	Eli Lilly	\$371,797.74	\$371,797.74	\$0.00	\$84,500.00	158	158			42
5	Medtronic	\$369,804.81		\$1.22	\$43,008.00	307		2	305	23
6	Merck	\$285,283.65	\$283,853.80	\$1.46	\$36,769.00	291	286	5		35
7	AstraZeneca Pharmaceuticals	\$244,054.00	\$244,054.00	\$0.00	\$31,349.00	80	80			14
8	Novo Nordisk	\$226,756.00	\$226,756.00	\$36.00	\$127,479.00	43	43			13
9	Pfizer	\$187,938.08	\$187,938.08	\$0.55	\$17,290.00	133	133			64
10	Allergan	\$179,148.26	\$9,920.98	\$1.89	\$70,000.00	239**	188	41	6	58
11	Takeda Pharmaceuticals America	\$172,602.11	\$172,602.11	\$24.95	\$89,487.00	26	26			6
12	Biogen Idec	\$156,420.36	\$156,420.36	\$17.80	\$37,898.00	87	87			6
13	Philips Healthcare, a Division of Philips Electronics North America	\$153,166.09		\$1,250.00	\$46,594.04	10			10	2
14	Bayer HealthCare	\$117,394.00	\$117,394.00	\$0.00	\$63,402.00	8	7		1	5
15	Shire Pharmaceuticals	\$95,876.83	\$95,876.83	\$26.90	\$34,302.00	27	27			6
16	Ethicon Endo-Surgery	\$90,505.93		\$1.72	\$63,305.33	46			46	27
17	sanofi-aventis	\$85,437.00	\$62,902.00	\$17.00	\$10,963.00	83	69	10	4	35
18	The Medicines Company	\$83,744.00	\$83,744.00	\$62.00	\$6,012.00	30	30			1
19	Wright Medical Technology	\$73,632.44		\$7.49	\$24,976.82	30			30	3
20	St. Jude Medical, A trial Fibrillation Division	\$72,604.75		\$604.75	\$72,000.00	2			2	1
21	Forest Pharmaceuticals, a subsidiary of Forest Laboratories	\$72,209.19	\$72,209.19	\$2.00	\$24,585.47	103	103			7
22	OraSure Technologies	\$69,775.00		\$69,775.00	\$69,775.00	1			1	1
23	Amgen	\$69,223.39	\$13,445.63	\$5.25	\$3,900.00	100	9	91		18

Rank	Manufacturer	Expenditure Total	Pharmaceutical Expenditure Total	Minimum Expenditure	Maximum Expenditure	Number of Expenditures	Number of Pharmaceutical Expenditures	Number of Biologic Expenditures	Number of Medical Device Expenditures	Number of Recipients*
24	Boehringer Ingelheim Pharmaceuticals	\$60,721.20	\$60,721.20	\$4.31	\$21,605.64	55	55			37
25	Boston Scientific	\$56,512.95		\$0.58	\$28,875.00	32			32	8
26	Teva Pharmaceuticals USA	\$42,324.28	\$42,324.28	\$48.06	\$5,790.00	30	30			5
27	Biosense Webster	\$41,006.00		\$42.00	\$5,729.00	50			50	5
28	Codman & Shurtleff	\$40,835.73		\$936.00	\$8,559.71	10			10	3
29	Olympus Corporation of the Americas	\$39,842.80		\$406.80	\$21,667.00	5			5	3
30	GE Healthcare	\$37,580.84		\$0.00	\$10,600.00	25			25	14
31	EMD Serono	\$31,486.32	\$31,486.32	\$4.59	\$8,000.00	27	27			8
32	Ortho-McNeil-Janssen Pharmaceuticals	\$29,461.06	\$29,461.06	\$24.95	\$5,177.10	56	56			34
33	Actelion Pharmaceuticals US	\$28,304.00	\$28,304.00	\$12.00	\$3,000.00	40	40			2
34	Alcon Laboratories	\$26,302.00	\$26,277.00	\$0.00	\$24,277.00	7	2		5	4
35	UCB	\$23,681.55	\$16,368.00	\$39.99	\$6,775.20	28	7	21		19
36	Globus Medical	\$22,779.91		\$841.91	\$4,930.00	9			9	1
37	OraPharma	\$22,107.88	\$22,107.88	\$300.00	\$21,112.88	3	3			1
38	Acorda Therapeutics	\$20,370.06	\$20,370.06	\$4.89	\$4,375.00	18	18			2
39	Millennium Pharmaceuticals	\$19,460.72	\$19,460.72	\$24.95	\$5,250.64	19	19			9
40	Bristol-Myers Squibb	\$18,669.00	\$18,669.00	\$2.00	\$6,044.00	22	22			10
41	Zimmer	\$17,341.12		\$154.71	\$12,286.01	12		1	11	3
42	Warner Chilcott US	\$17,301.00	\$17,301.00	\$17,301.00	\$17,301.00	1	1			N/A
43	Luitpold Pharmaceuticals	\$17,225.00	\$17,225.00	\$1,500.00	\$5,755.00	4	4			1
44	Daiichi Sankyo	\$16,473.14	\$16,473.14	\$49.99	\$3,979.00	18	18			7
45	Straumann Manufacturing	\$15,860.00		\$0.00	\$9,822.00	6			6	5
46	J & J Vision Care	\$15,275.00		\$700.00	\$7,225.00	7			7	4
47	Gilead Sciences	\$14,028.00	\$14,028.00	\$24.00	\$3,576.00	11	11			3
48	Centocor Ortho Biotech	\$13,968.73		\$24.95	\$2,500.00	25		25		18
49	Lantheus Medical Imaging	\$13,115.46	\$13,115.46	\$13,115.46	\$13,115.46	1	1			N/A

Exhibit 1-2

Rank	Manufacturer	Expenditure Total	Pharmaceutical Expenditure Total	Minimum Expenditure	Maximum Expenditure	Number of Expenditures	Number of Pharmaceutical Expenditures	Number of Biologic Expenditures	Number of Medical Device Expenditures	Number of Recipients*
50	Ethicon	\$12,792.00		\$113.00	\$7,113.00	5			5	4
51	SI-Bone	\$12,665.49		\$120.45	\$3,225.00	11			11	1
52	Purdue Pharma	\$11,826.35	\$11,826.35	\$11,826.35	\$11,826.35	1	1			N/A
53	C. R. Bard	\$11,245.10		\$33.33	\$4,000.00	9			9	4
54	Hospira	\$11,112.87	\$11,112.87	\$1,000.00	\$7,412.87	4	4			1
55	Eisai	\$11,017.00	\$11,017.00	\$750.00	\$5,694.00	6	6			2
56	Sanofi Pasteur	\$10,419.00		\$6.00	\$5,000.00	10		10		2
57	Cook Medical	\$9,500.04		\$5.26	\$8,431.28	11			11	6
58	St. Jude Medical S.C., a division of St. Jude Medical	\$9,439.42		\$4.31	\$2,000.00	24			24	8
59	Intuitive Surgical	\$9,235.00		\$411.00	\$2,150.00	7			7	6
60	DePuy Mitek	\$8,534.00		\$263.00	\$2,064.00	9			9	5
61	Stryker	\$8,030.17		\$0.00	\$1,053.04	98			98	30
62	Covidien, Surgical Devices	\$7,948.66		\$22.02	\$2,500.00	30			30	12
63	Arthrex	\$7,782.00		\$10.00	\$1,500.00	18			18	17
64	McKesson Technologies	\$7,700.00		\$200.00	\$7,500.00	2			2	2
65	Johnson & Johnson Pharmaceutical Research and Development	\$7,412.35		\$290.62	\$6,272.00	4		4		2
66	Medicis Pharmaceutical	\$7,162.00	\$6,392.00	\$0.00	\$3,500.00	28	6		22	13
67	Genzyme	\$6,200.00	\$6,200.00	\$1,700.00	\$2,500.00	3	3			2
68	Human Genome Sciences	\$6,000.00		\$6,000.00	\$6,000.00	1		1		1
69	Endo Pharmaceuticals	\$5,842.32	\$5,842.32	\$46.95	\$4,043.97	24	24			23
70	Oticon	\$5,808.29		\$11.50	\$1,748.48	18			18	8
71	Tornier	\$5,750.00		\$2,750.00	\$3,000.00	2			2	1
72	AGA Medical	\$5,750.00		\$750.00	\$5,000.00	2			2	2
73	Smith & Nephew	\$5,653.91		\$33.67	\$4,650.00	9			9	9
74	United Therapeutics	\$5,162.48	\$5,162.48	\$5,162.48	\$5,162.48	1	1			N/A
75	CareFusion	\$4,908.82		\$0.00	\$2,241.80	55			55	17

Exhibit 1-3

Rank	Manufacturer	Expenditure Total	Pharmaceutical Expenditure Total	Minimum Expenditure	Maximum Expenditure	Number of Expenditures	Number of Pharmaceutical Expenditures	Number of Biologic Expenditures	Number of Medical Device Expenditures	Number of Recipients*
76	Talecris Biotherapeutics	\$4,756.44		\$79.44	\$2,877.00	4		4		3
77	ConvaTec	\$4,607.59		\$50.00	\$4,417.59	3			3	2
78	W.L. Gore & Associates	\$4,305.00		\$59.00	\$1,500.00	8			8	4
79	Regeneron Pharmaceuticals	\$4,038.10		\$1,038.10	\$3,000.00	2		2		1
80	LifeCell	\$3,971.00		\$1,235.00	\$1,500.00	3			3	1
81	Respiratory & Monitoring Solutions - Covidien	\$3,300.00		\$550.00	\$1,500.00	3			3	2
82	Salix Pharmaceuticals	\$3,200.00	\$3,200.00	\$3,200.00	\$3,200.00	1	1			1
83	LEO Pharma	\$3,160.00	\$3,160.00	\$101.00	\$2,380.00	4	4			N/A
84	Starkey Laboratories	\$3,150.00		\$250.00	\$1,450.00	3			3	2
85	DJO	\$3,063.27		\$3,063.27	\$3,063.27	1			1	N/A
86	Hill-Rom	\$3,057.00		\$0.00	\$3,057.00	11			11	6
87	Terumo Medical	\$3,000.00		\$3,000.00	\$3,000.00	1			1	1
88	Draeger Medical Systems	\$3,000.00		\$500.00	\$2,500.00	2			2	2
89	Roche Diagnostics Operations	\$2,871.98		\$69.98	\$585.00	7			7	2
90	Nobel Biocare USA	\$2,670.00		\$5.00	\$665.00	6			6	6
91	Somaxon Pharmaceuticals	\$2,618.00	\$2,618.00	\$2,618.00	\$2,618.00	1	1			N/A
92	ConMed Corporation and Affiliates	\$2,500.00		\$2,500.00	\$2,500.00	1			1	1
93	St. Jude Medical, Cardiology Division d/b/a St. Jude Medical, Cardiovascular Division	\$2,452.00		\$2,452.00	\$2,452.00	1			1	N/A
94	Essilor of America	\$2,413.00		\$45.00	\$279.00	18			18	13
95	Galderma Laboratories	\$2,391.02	\$2,391.02	\$21.57	\$271.10	21	21			N/A
96	Integra LifeSciences	\$2,261.00		\$0.00	\$2,000.00	5			5	2
97	3M ESPE Dental Products	\$2,049.60		\$2,049.60	\$2,049.60	1			1	N/A
98	Alexion Pharmaceuticals	\$2,000.00	\$2,000.00	\$500.00	\$750.00	3	3			2

Exhibit 1-4

Rank	Manufacturer	Expenditure Total	Pharmaceutical Expenditure Total	Minimum Expenditure	Maximum Expenditure	Number of Expenditures	Number of Pharmaceutical Expenditures	Number of Biologic Expenditures	Number of Medical Device Expenditures	Number of Recipients*
99	Advanced Neuromodulation Systems d/b/a St. Jude Medical Neuromodulation Division	\$1,959.73		\$4.76	\$1,945.45	4			4	3
100	Ferring Pharmaceuticals	\$1,928.00	\$1,920.00	\$1.00	\$1,000.00	11	9		2	6
101	Amylin Pharmaceuticals	\$1,900.00	\$1,900.00	\$400.00	\$850.00	3	3			3
102	Karl Storz Endoskope	\$1,750.00		\$0.00	\$1,250.00	76***			75	7
103	Merz Pharmaceuticals	\$1,722.00		\$1,722.00	\$1,722.00	1		1		1
104	Bausch & Lomb	\$1,667.60		\$208.00	\$500.00	4			4	3
105	Ortho Clinical Diagnostics	\$1,625.21	\$25.00	\$25.00	\$1,600.21	2	1		1	N/A
106	King Pharmaceuticals	\$1,443.97	\$1,443.97	\$1.75	\$971.08	4	4			N/A
107	DePuy Spine	\$1,356.08		\$339.90	\$1,016.18	2			2	2
108	Masimo	\$1,200.00		\$0.00	\$1,200.00	2			2	1
109	Reckitt Benckiser	\$1,168.00	\$1,168.00	\$1,168.00	\$1,168.00	1	1			N/A
110	Becton Dickinson	\$1,155.00		\$1,155.00	\$1,155.00	1			1	N/A
111	B. Braun Medical	\$1,112.84		\$5.00	\$1,107.84	2			2	1
112	Arthrocare	\$1,097.32		\$1,097.32	\$1,097.32	1			1	N/A
113	DePuy Orthopaedics	\$1,020.33		\$13.66	\$316.14	13			13	5
114	Aptalis Pharma US	\$1,000.00	\$1,000.00	\$1,000.00	\$1,000.00	1	1			1
115	LightLab Imaging	\$890.00		\$890.00	\$890.00	1			1	N/A
116	Lanx	\$876.75		\$876.75	\$876.75	1			1	N/A
117	Hoya Vision Care	\$867.61		\$867.61	\$867.61	1			1	N/A
118	Astellas Pharma US	\$786.55	\$786.55	\$38.95	\$99.95	12	12			6
119	Dendreon	\$780.00		\$15.00	\$750.00	3		3		3
120	Energy-based Devices, a Division of Covidien	\$750.00		\$0.00	\$750.00	2			2	2
121	Medline Industries	\$708.93		\$2.00	\$27.34	69			69	45
122	Transitions Optical	\$700.00		\$100.00	\$100.00	7			7	7
123	Biomet 3i	\$665.00		\$0.00	\$665.00	43			43	6

Exhibit 1-5

Rank	Manufacturer	Expenditure Total	Pharmaceutical Expenditure Total	Minimum Expenditure	Maximum Expenditure	Number of Expenditures	Number of Pharmaceutical Expenditures	Number of Biologic Expenditures	Number of Medical Device Expenditures	Number of Recipients*
124	Fisher & Paykel Healthcare	\$643.27		\$643.27	\$643.27	1			1	N/A
125	Pacesetter d/b/a St. Jude Medical Cardiac Rhythm Management Division	\$640.24		\$640.24	\$640.24	1			1	N/A
126	ViiV Healthcare	\$521.00	\$521.00	\$521.00	\$521.00	1	1			N/A
127	American Medical Systems	\$502.00		\$2.50	\$135.00	16			16	12
128	Cadence Pharmaceuticals	\$476.00	\$476.00	\$476.00	\$476.00	1	1			N/A
129	Nestle HealthCare Nutrition	\$440.00		\$120.00	\$170.00	3			3	2
130	SonoSite	\$425.00		\$425.00	\$425.00	1			1	1
131	Cordis	\$373.00		\$373.00	\$373.00	1			1	N/A
132	Biomet	\$341.92		\$341.92	\$341.92	1			1	N/A
133	Covidien Vascular Therapies	\$300.00		\$300.00	\$300.00	1			1	1
134	Jazz Pharmaceuticals	\$261.00	\$261.00	\$261.00	\$261.00	1	1			N/A
135	Advanced Bionics	\$250.00		\$250.00	\$250.00	1			1	1
136	CSL Behring	\$250.00		\$250.00	\$250.00	1		1		1
137	Cochlear Americas	\$250.00		\$0.00	\$250.00	25			25	5
138	Allos Therapeutics	\$207.83	\$207.83	\$2.61	\$200.00	4	4			1
139	Actavis	\$124.00	\$124.00	\$11.00	\$56.00	5	5			N/A
140	Tibotec Therapeutics	\$119.00	\$119.00	\$119.00	\$119.00	1	1			N/A
141	Dyax	\$118.33		\$118.33	\$118.33	1		1		1
142	Savient Pharmaceuticals	\$117.76		\$117.76	\$117.76	1		1		N/A
143	Adolor	\$116.24	\$116.24	\$116.24	\$116.24	1	1			1
144	Eurand Pharmaceuticals	\$95.00	\$95.00	\$20.00	\$52.00	3	3			2
145	Johnson and Johnson Health Care Systems	\$95.00		\$32.00	\$63.00	2			2	2
146	Coloplast Manufacturing US	\$61.06		\$18.40	\$42.66	2			2	2
147	3M	\$60.35		\$60.35	\$60.35	1			1	N/A
148	Merz Aesthetics	\$60.00	\$60.00	\$12.00	\$24.00	3	3			2
149	QLT Ophthalmics	\$50.00	\$50.00	\$50.00	\$50.00	1	1			N/A

Exhibit 1-6

Rank	Manufacturer	Expenditure Total	Pharmaceutical Expenditure Total	Minimum Expenditure	Maximum Expenditure	Number of Expenditures	Number of Pharmaceutical Expenditures	Number of Biologic Expenditures	Number of Medical Device Expenditures	Number of Recipients*
150	Watson Pharmaceuticals	\$30.00	\$30.00	\$5.00	\$5.00	6	6			2
151	Vascular Solutions	\$9.74		\$0.00	\$9.74	7			7	2
152	EBI d/b/a Biomet Spine & Bone Healing Technologies	\$9.00		\$9.00	\$9.00	1			1	N/A
153	NuVasive	\$1.53		\$0.51	\$0.51	3		3		3
154	Alkermes	\$0.80	\$0.80	\$0.80	\$0.80	1	1			1
Totals		\$5,624,891.07	\$3,952,608.42	—	—	4,277	2,107	227	1,938	—

* An N/A in this column designates that the manufacturer reported only aggregate expenditures for which recipients were not listed. For FY11, the Attorney General's Office allowed manufacturers to elect to report permitted gifts with a fair market value below \$25, such as a small amount of educational brochures, as expenditures made to all Vermont health care providers and institutions in the aggregate.

** Four expenditures were reported as not associated with a particular product type.

*** One expenditure was reported as not associated with a particular product type.

Note: For purposes of this exhibit, when manufacturers disclosed one payment for marketing several different product types, the Attorney General's Office allocated the entire payment to the first product type disclosed in connection with the payment.

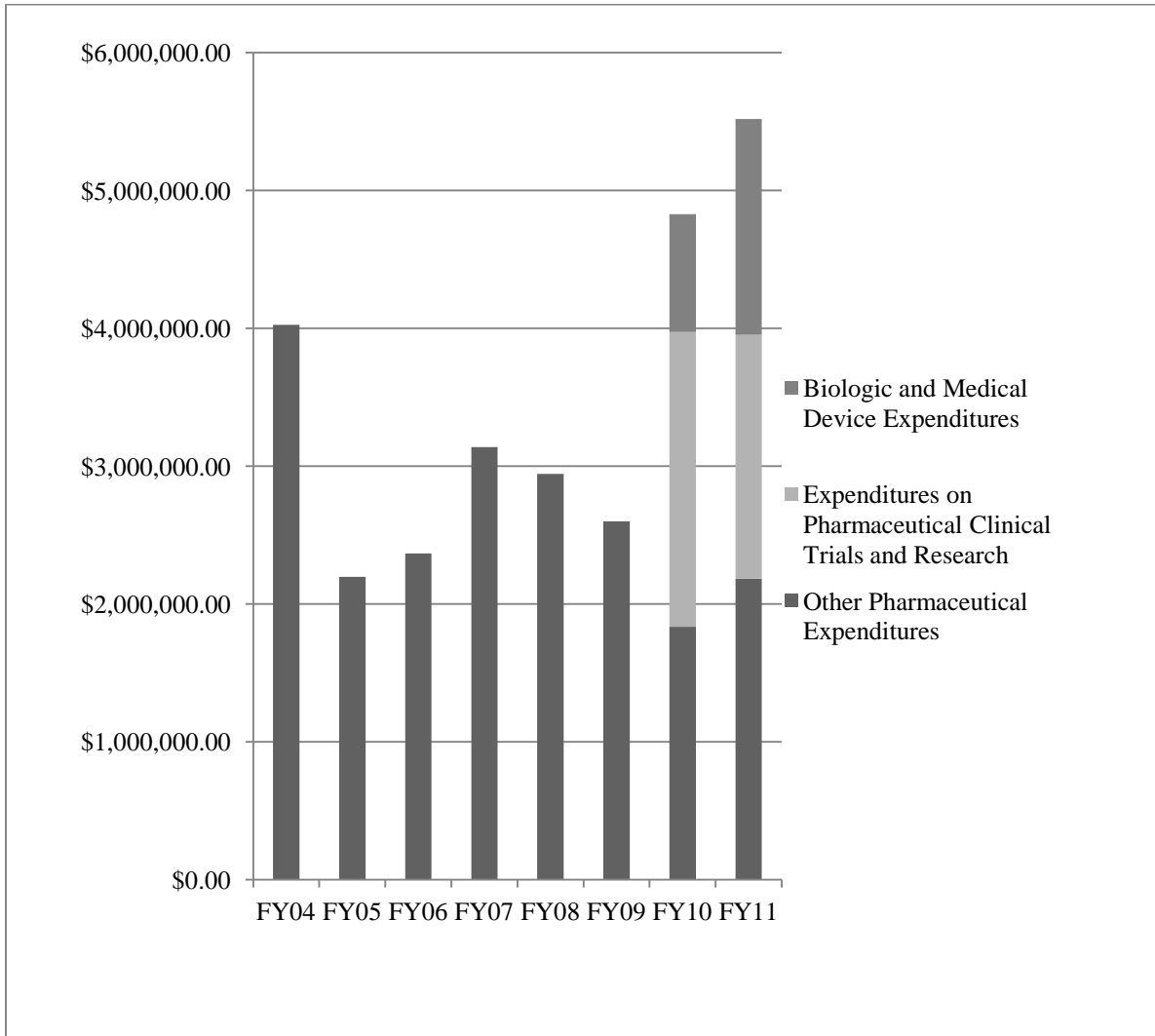
Exhibit 2: Expenditures by Product Type, FY11

Product Type	Expenditure Total	Percent of Expenditure Total	Number of Expenditures	Percent of Number of Expenditures
Pharmaceutical	\$7,387,862.10	77%	3,316	43%
Medical Device	\$1,893,036.87	20%	4,141	53%
Biologic	\$260,530.73	3%	332	4%

Totals \$9,541,429.70 7,789

Note: For purposes of this exhibit, when manufacturers disclosed one payment for marketing several different products, the Attorney General's Office allocated the entire payment to each of the products disclosed in connection with the payment.

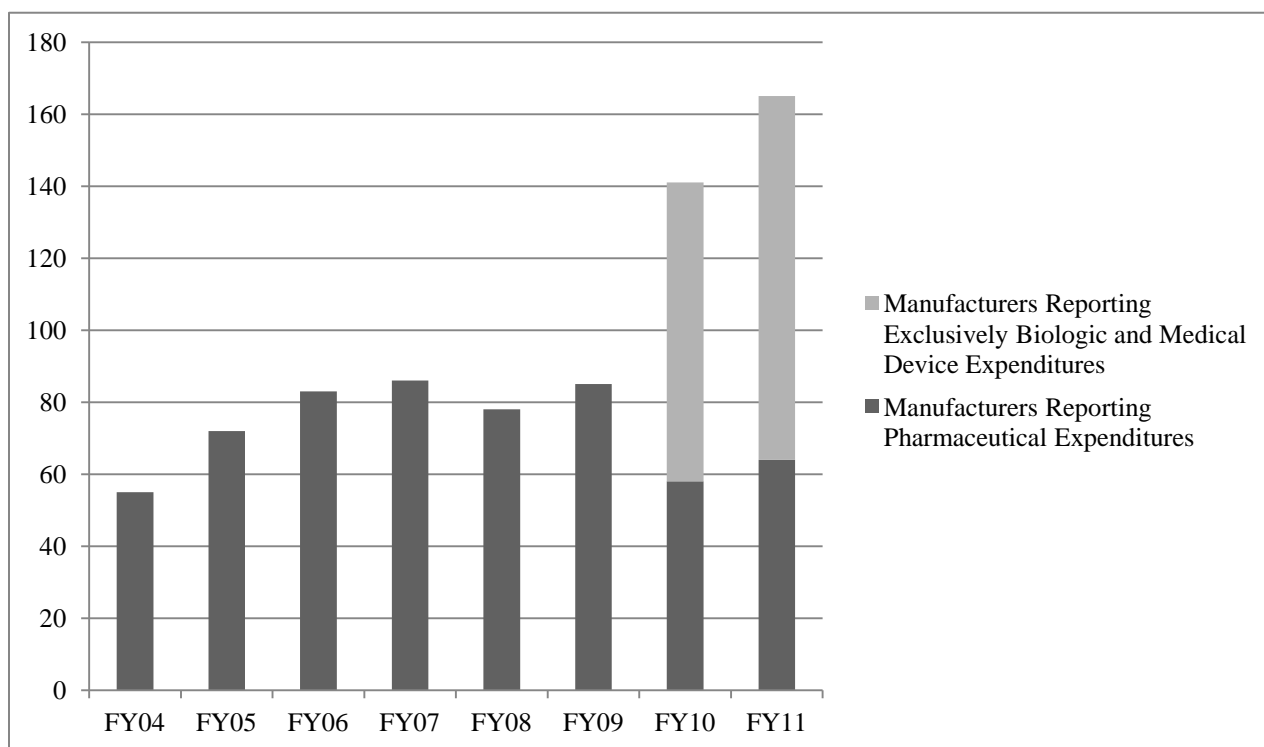
Exhibit 3: Total Expenditures, FY04-FY11



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

Note: For purposes of this exhibit, when manufacturers disclosed one payment for marketing several different products, the Attorney General's Office allocated the entire payment to the first product disclosed in connection with the payment.

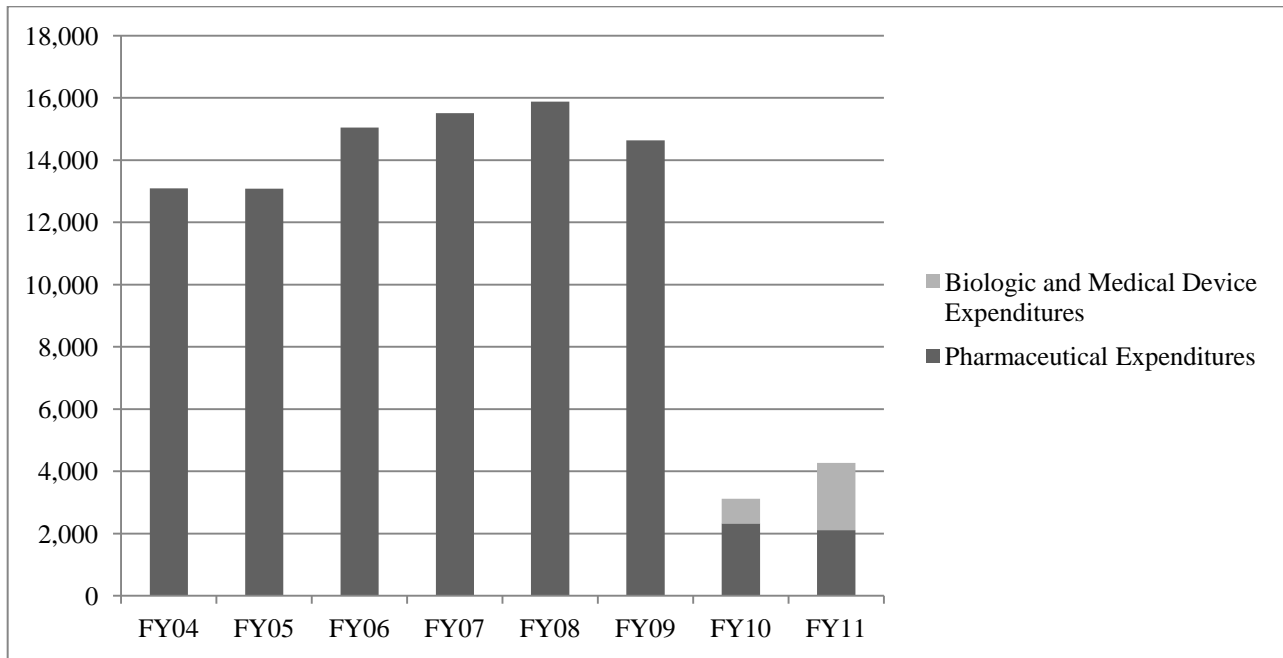
Exhibit 4: Total Number of Manufacturers Reporting Expenditures, FY04-FY11



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

Note: For purposes of this exhibit, when manufacturers disclosed one payment for marketing several different products, the Attorney General's Office allocated the entire payment to the first product disclosed in connection with the payment.

Exhibit 5: Total Number of Expenditures, FY04-FY11



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

Note: For purposes of this exhibit, when manufacturers disclosed one payment for marketing several different products, the Attorney General’s Office allocated the entire payment to the first product disclosed in connection with the payment.

Exhibit 6: Top Five Manufacturers - Expenditures of Five Manufacturers with Highest Expenditures, FY07-FY11

FY11 Rank	FY07	FY08	FY09	FY10	FY11
1	Eli Lilly	Eli Lilly	Eli Lilly	Pfizer	Abbott Laboratories
2	Pfizer	Pfizer	Pfizer	GlaxoSmithKline	Novartis Pharmaceuticals
3	UCB	Novartis Pharmaceuticals	Forest Pharmaceuticals	Novartis Pharmaceuticals	GlaxoSmithKline
4	Novartis Pharmaceuticals	Merck	Merck and Merck Schering Plough	Daiichi Sankyo	Eli Lilly
5	Merck	Forest Pharmaceuticals	GlaxoSmithKline	Eli Lilly	Medtronic
Expenditure Total for Top Five Manufacturers	\$1,756,150.56	\$1,519,745.18	\$1,230,540.64	\$2,266,455.09	\$2,164,273.99
Percentage of Overall Expenditure Total Attributable to Expenditures of Top Five Manufacturers	56%	52%	47%	47%	39%

Note: The top five manufacturers for FY10 and prior fiscal years reported exclusively pharmaceutical-related expenditures. However, in FY11, while Novartis Pharmaceuticals, GlaxoSmithKline, and Eli Lilly reported exclusively pharmaceutical-related expenditures, Abbott Laboratories and Medtronic reported other kinds of expenditures; Abbot Laboratories reported pharmaceutical and medical device expenditures and Medtronic reported medical device and biologic expenditures.

Exhibit 7: Expenditures by Recipient Type, FY11

Recipient Type	Expenditure Total	Pharmaceutical Expenditure Total	Minimum Expenditure	Maximum Expenditure	Median Expenditure	Number of Expenditures	Number of Recipients
Clinical Trial/Research	\$2,376,217.41	\$1,769,156.86	\$0.00	\$101,376.00	\$1,825.20	479	46
Doctor	\$1,295,164.73	\$842,096.08	\$0.00	\$46,594.04	\$92.55	1,820	403
Aggregate*	\$671,153.75	\$534,804.60	\$1.00	\$127,479.00	\$11.00	982	N/A
Professional/Educational/ Patient Organization	\$666,961.28	\$608,573.44	\$200.00	\$400,000.00	\$750.00	81	34
Academic Institution	\$304,932.08	\$148,450.00	\$0.00	\$70,000.00	\$1,000.00	104	1
Hospital/Clinic	\$202,976.49	\$1,918.00	\$0.00	\$63,305.33	\$0.00	242	24
Other Prescriber	\$58,822.32	\$35,064.40	\$0.00	\$5,038.00	\$51.06	197	76
Other Health Care Provider	\$45,591.91	\$12,245.03	\$0.00	\$2,400.00	\$46.52	350	113
Unknown Health Care Provider	\$2,154.14	\$0.00	\$0.00	\$984.40	\$20.00	12	3
Nonprofit Hospital Foundation	\$400.00	\$200.00	\$200.00	\$200.00	\$200.00	2	1
Other	\$270.00	\$0.00	\$120.00	\$150.00	\$135.00	2	1
Pharmacist	\$246.96	\$100.00	\$7.59	\$84.95	\$50.00	5	5
Nursing Home	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	1	1

Totals	\$5,624,891.07	\$3,952,608.42	—	—	—	4,277	—
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Overall Median Expenditure	\$70.00
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* For FY11, the Attorney General’s Office allowed manufacturers to elect to report permitted gifts with a fair market value below \$25, such as a small amount of educational brochures, as expenditures made to all Vermont health care providers and institutions in the aggregate.

Exhibit 8: Expenditures by Specialty or Credential for Individual Health Care Providers who Received \$3,000 or More, FY08-FY11

FY11 Rank	Specialty or Credential	FY08 Expenditure Total	FY09 Expenditure Total	FY10 Pharmaceutical Expenditure Total	FY10 Expenditure Total	FY11 Pharmaceutical Expenditure Total	FY11 Expenditure Total
1	Ionizing Radiation Privileges	\$120,879.10	\$104,694.16		\$16,052.01	\$94,800.58	\$207,617.77
2	Neurology	\$193,377.79	\$159,364.01	\$87,411.84	\$141,546.85	\$177,142.73	\$184,940.17
3	Radiology						\$149,416.09
4	Psychiatry	\$396,978.52	\$378,729.91	\$151,001.77	\$151,001.77	\$125,142.44	\$125,142.44
5	Geriatric Medicine	\$51,672.20	\$77,338.32	\$68,987.88	\$68,987.88	\$104,486.47	\$108,524.57
6	Internal Medicine	\$272,737.14	\$206,178.83	\$29,029.49	\$29,029.49	\$86,767.53	\$104,570.25
7	Orthopaedic Surgery				\$4,106.00		\$75,607.74
8	Medical Oncology	\$34,852.85	\$52,040.04	\$40,847.80	\$53,443.91	\$54,965.59	\$61,354.96
9	Doctor: No Specialty Listed					\$59,658.54	\$59,658.54
10	Advanced Practice Registered Nurse (APRN)	\$80,865.25	\$80,384.07	\$20,469.11	\$31,990.58	\$31,887.32	\$43,339.83
11	Thoracic Surgery				\$6,350.58		\$37,335.73
12	Endocrinology, Diabetes & Metabolism	\$176,347.61	\$86,345.52	\$40,083.21	\$40,083.21	\$36,676.00	\$36,676.00
13	Osteopathic Physician	\$78,645.84	\$60,461.04	\$64,349.16	\$64,349.16	\$31,561.29	\$31,561.29
14	Diagnostic Radiology						\$17,763.44
15	Hematology		\$16,777.16		\$19,088.85		\$17,251.00
16	Registered Nurse (RN)	\$23,981.28	\$34,948.61	\$20,773.74	\$20,773.74	\$4,089.66	\$13,689.66
17	Cardiovascular Disease	\$47,034.11	\$49,516.79	\$24,499.00	\$24,499.00	\$12,082.00	\$12,082.00
18	Critical Care Medicine	\$6,338.00	\$6,467.59	\$12,085.00	\$12,085.00	\$9,872.00	\$9,872.00
19	Physical Medicine and Rehabilitation	\$12,501.48	\$17,775.75	\$6,758.08	\$6,758.08	\$7,871.44	\$7,871.44
20	Nephrology	\$11,361.87		\$18,750.00	\$18,750.00	\$3,534.64	\$7,790.04
21	Anesthesiology					\$6,469.95	\$6,469.95
22	Dentist						\$5,038.00
23	Pulmonary Disease	\$6,858.42	\$3,868.91	\$3,476.57	\$3,476.57	\$4,596.19	\$4,596.19
24	Obstetrics and Gynecology						\$4,300.00
25	Dermatology	\$15,190.14	\$6,449.30		\$3,220.00	\$3,776.40	\$3,776.40
26	Surgery						\$3,557.00
27	Ophthalmology				\$11,750.00	\$3,351.87	\$3,351.87
28	Urology	\$17,614.24	\$18,233.21	\$5,470.00	\$8,859.34		\$3,098.43
*	Pediatrics	\$35,771.53	\$72,459.58	\$15,244.44	\$30,304.44		
*	Gastroenterology	\$5,209.76		\$14,966.00	\$14,966.00		
*	Pediatric Gastroenterology				\$8,549.46		
*	Family Practice	\$96,115.95	\$122,691.13				
*	Limited Temporary Permit Physician	\$7,508.19	\$33,148.00				
*	Geriatric Psychiatry	\$89,369.64	\$15,710.52				
*	Addiction Psychiatry		\$9,558.69				
*	Allergy and Immunology	\$38,567.50	\$4,600.38				
*	Physician Assistant (PA)	\$18,915.32	\$3,880.65				
*	Clinical Neurophysiology	\$7,246.02					
Total Expenditures		\$1,722,177.90	\$1,502,408.84	\$582,960.24	\$737,257.60	\$858,732.65	\$1,346,252.81
Total Recipients		104	102	33	44	36	56

* There were no doctors with these specialties, or other individual health care providers with these credentials, who received more than \$3,000 in FY11.

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 9: Expenditures by Payment Purpose for Individual Health Care Providers Receiving \$3,000 or More in Expenditures, FY11

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	Radiology	\$149,416.09	\$149,416.09											
2	Geriatric Medicine	\$108,524.57	\$17,685.53		\$29,219.94	\$58,069.10					\$400.00		\$3,150.00	
3	Ionizing Radiation Privileges	\$101,054.79	\$8,773.36			\$7,000.00			\$1,671.43	\$24.00	\$83,586.00			
4	Neurology	\$95,684.47			\$10,675.10	\$84,400.00				\$609.38				
5	Psychiatry	\$67,951.57	\$2,087.88			\$2,000.00					\$63,863.69			
6	Medical Oncology	\$54,965.59			\$10,865.59	\$44,100.00								
7	Ionizing Radiation Privileges	\$45,025.79	\$28,997.00	\$80.00	\$1,527.90	\$4,100.00			\$4,587.39				\$5,733.50	
8	Internal Medicine	\$40,243.21			\$3,194.21	\$16,000.00					\$21,049.00			
9	Thoracic Surgery	\$37,335.73	\$33,409.93									\$3,925.80		
10	Endocrinology, Diabetes + Metabolism	\$36,676.00	\$14,633.00		\$7,193.00	\$14,850.00								
11	Orthopaedic Surgery	\$35,445.40	\$25,952.40						\$2,500.00		\$6,993.00			
12	Orthopaedic Surgery	\$34,412.34										\$4,272.76	\$30,139.58	
13	Neurology	\$32,986.63	\$17,313.09		\$2,920.46	\$12,500.00				\$253.08				
14	Osteopathic Physician	\$31,561.29	\$12,682.54		\$268.71						\$18,610.04			

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
15	Ionizing Radiation Privileges	\$31,109.10	\$22,532.00		\$2,055.85	\$6,000.00			\$521.25					
16	Doctor: No Specialty Listed	\$27,358.52			\$2,858.52	\$24,500.00								
17	Advanced Practice Registered Nurse	\$25,026.63	\$7,671.19		\$1,483.10	\$7,620.00			\$639.49		\$7,612.85			
18	Neurology	\$23,784.98	\$1,084.13		\$1,370.85	\$6,750.00				\$79.44	\$14,500.56			
19	Psychiatry	\$22,909.22			\$1,609.22	\$21,300.00								
20	Psychiatry	\$22,803.30		\$10.00							\$22,793.30			
21	Advanced Practice Registered Nurse	\$18,313.20	\$1,731.93		\$1,157.38	\$15,200.18				\$223.71				
22	Diagnostic Radiology	\$17,763.44			\$489.40				\$456.76					\$16,817.28
23	Ionizing Radiation Privileges	\$17,493.28				\$1,750.00			\$1,500.00			\$2,745.78	\$11,497.50	
24	Hematology	\$17,251.00	\$8,129.56	\$93.00	\$3,108.95	\$5,000.00				\$919.49				
25	Doctor: No Specialty Listed	\$16,702.03	\$135.04		\$1,977.91	\$13,770.00				\$819.09				
26	Doctor: No Specialty Listed	\$15,597.99	\$15,597.99											
27	Internal Medicine	\$14,830.76			\$4,580.76	\$10,250.00								
28	Registered Nurse	\$13,689.66			\$789.66	\$3,300.00					\$9,600.00			
29	Internal Medicine	\$13,401.55	\$13,401.55											

Exhibit 9-2

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
30	Internal Medicine	\$13,203.00	\$13,203.00											
31	Neurology	\$12,368.00	\$6,650.00			\$1,722.00				\$3,996.00				
32	Cardiovascular Disease	\$12,082.00			\$542.00	\$11,540.00								
33	Psychiatry	\$11,478.35			\$52.73	\$4,500.00					\$6,925.62			
34	Neurology	\$11,116.09			\$6,516.09	\$4,600.00								
35	Critical Care Medicine	\$9,872.00									\$9,872.00			
36	Neurology	\$9,000.00	\$6,500.00			\$2,500.00								
37	Internal Medicine	\$8,760.61	\$4,200.00	\$16.95	\$20.00	\$3,500.00			\$476.22		\$547.44			
38	Physical Medicine and Rehabilitation	\$7,871.44	\$1,035.70			\$2,250.00					\$4,585.74			
39	Internal Medicine	\$7,005.35	\$1,000.00	\$90.00	\$415.35	\$5,500.00								
40	Anesthesiology	\$6,469.95			\$469.95	\$6,000.00								
41	Medical Oncology	\$6,389.37	\$5,942.45							\$446.92				
42	Internal Medicine	\$5,989.76	\$4,743.76						\$1,246.00					
43	Orthopaedic Surgery	\$5,750.00				\$5,750.00								
44	Dentist	\$5,038.00		\$5,038.00										
45	Pulmonary Disease	\$4,596.19			\$596.19	\$4,000.00								
46	Obstetrics and Gynecology	\$4,300.00						\$4,300.00						

Exhibit 9-3

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
47	Nephrology	\$4,284.64	\$3,534.64			\$750.00								
48	Internal Medicine	\$3,925.77	\$3,900.00	\$25.77										
49	Ionizing Radiation Privileges	\$3,913.96			\$1,381.96	\$2,532.00								
50	Dermatology	\$3,776.40				\$3,604.32				\$172.08				
51	Surgery	\$3,557.00					\$3,557.00							
52	Nephrology	\$3,505.40	\$3,300.00							\$205.40				
53	Ophthalmology	\$3,351.87				\$3,294.56				\$57.31				
54	Internal Medicine	\$3,200.00				\$3,200.00								
55	Urology	\$3,098.43	\$1,857.00		\$1,223.03					\$18.40				
56	Ionizing Radiation Privileges	\$3,031.09							\$3,031.09					
Totals		\$1,346,252.81	\$437,100.76	\$5,353.72	\$98,563.81	\$423,702.16	\$3,557.00	\$4,300.00	\$16,629.63	\$7,824.29	\$270,939.24	\$10,944.34	\$50,520.58	\$16,817.28

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 10: Expenditures for Top Products – 50 Products with the Greatest Expenditures, FY11

Rank	Product Name	Manufacturer	Product Type	Primary Indication	Expenditure Total
1	Humira	Abbott Laboratories	Pharmaceutical	Rheumatoid Arthritis	\$453,180.95
2	TriCor	Abbott Laboratories	Pharmaceutical	Hypercholesterolemia	\$449,484.05
3	Depakote	Abbott Laboratories	Pharmaceutical	Bipolar Disorder	\$446,506.05
4	Kaletra	Abbott Laboratories	Pharmaceutical	HIV	\$446,038.05
5	Ultane	Abbott Laboratories	Pharmaceutical	General Anesthesia	\$445,479.05
6	Gilenya	Novartis Pharmaceuticals	Pharmaceutical	Multiple Sclerosis	\$239,295.05
7	Victoza	Novo Nordisk	Pharmaceutical	Type 2 Diabetes	\$221,031.00
8	NovoLog	Novo Nordisk	Pharmaceutical	Types 1 and 2 Diabetes	\$184,016.00
9	Levemir	Novo Nordisk	Pharmaceutical	Types 1 and 2 Diabetes	\$183,693.00
10	NovoLog Mix	Novo Nordisk	Pharmaceutical	Types 1 and 2 Diabetes	\$183,693.00
11	Imaging systems	Philips Healthcare a Division of Philips Electronics North America	Medical Device	Imaging	\$149,416.09
12	Avonex	Biogen Idec	Pharmaceutical	Multiple Sclerosis	\$138,418.61
13	Norditropin	Novo Nordisk	Pharmaceutical	Growth Hormone Deficiency	\$127,479.00
14	Cymbalta	Eli Lilly	Pharmaceutical	Major Depressive Disorder	\$101,588.77
15	Januvia	Merck	Pharmaceutical	Type 2 Diabetes	\$91,507.99
16	Vyvanse	Shire Pharmaceuticals	Pharmaceutical	ADHD	\$88,183.10
17	Angiomax	The Medicines Company	Pharmaceutical	Anticoagulant	\$83,744.00
18	Betaseron	Bayer HealthCare	Pharmaceutical	Multiple Sclerosis	\$81,517.00
19	Vytorin	Merck	Pharmaceutical	Hyperlipidemia	\$74,847.21
20	Electrophysiological Device	St. Jude Medical, Atrial Fibrillation Division	Medical Device	Electrophysiology	\$72,604.75
21	Tekturna	Novartis Pharmaceuticals	Pharmaceutical	Hypertension	\$71,473.87
22	OraQuick HCV Rapid Antibody Test	OraSure Technologies	Medical Device	Hepatitis C	\$69,775.00
23	Echelon Flex 45 endo-cutter, Echelon 45 Reloads, Lapra-Ty clip applicator, Lapra-Ty suture clips, Endo-Loop	Ethicon Endo-Surgery	Medical Device	Laparoscopic Surgery	\$63,305.33
24	Botox	Allergan	Biologic	Urinary Incontinence	\$62,785.11
25	Zetia	Merck	Pharmaceutical	Hyperlipidemia	\$62,013.21
26	Emend	Merck	Pharmaceutical	Nausea and Vomiting	\$60,965.59

Rank	Product Name	Manufacturer	Product Type	Primary Indication	Expenditure Total
27	Cardiac Resynchronization Therapy	Medtronic	Medical Device	Systolic Dysfunction	\$56,719.00
28	Bystolic	Forest Pharmaceuticals, a subsidiary of Forest Laboratories	Pharmaceutical	Hypertension	\$47,936.11
29	Singulair	Merck	Pharmaceutical	Asthma	\$45,057.59
30	Leads	Medtronic	Medical Device	Leads	\$44,657.54
31	Prodense	Wright Medical Technology	Medical Device	Bone Graft Substitute	\$43,814.32
32	Tysabri	Biogen Idec	Pharmaceutical	Multiple Sclerosis	\$43,490.44
33	Taxus Element	Boston Scientific	Medical Device	Coronary Stent System	\$43,437.50
34	Strattera	Eli Lilly	Pharmaceutical	ADHD	\$43,237.30
35	Maxalt	Merck	Pharmaceutical	Migraine Headaches	\$39,736.04
36	Pradaxa	Boehringer Ingelheim Pharmaceuticals	Pharmaceutical	Reduce Risk of Stroke	\$38,977.03
37	Gardasil	Merck	Pharmaceutical	Human Papillomavirus	\$38,198.85
38	Savella	Forest Pharmaceuticals, a subsidiary of Forest Laboratories	Pharmaceutical	Fibromyalgia	\$36,593.32
49	Mirena	Bayer HealthCare	Pharmaceutical	Birth Control	\$35,877.00
40	Beyaz	Bayer HealthCare	Pharmaceutical	Birth Control	\$35,811.00
41	Natazia	Bayer HealthCare	Pharmaceutical	Birth Control	\$35,811.00
42	Yaz	Bayer HealthCare	Pharmaceutical	Birth Control	\$35,811.00
43	Teflaro	Forest Pharmaceuticals, a subsidiary of Forest Laboratories	Pharmaceutical	Acute Bacterial Skin and Skin Structure Infections	\$35,600.70
44	Azilect	Teva Pharmaceuticals USA	Pharmaceutical	Parkinson's Disease	\$33,534.28
45	Copaxone	Teva Pharmaceuticals USA	Pharmaceutical	Multiple Sclerosis	\$33,534.28
46	Contour	Bayer HealthCare	Medical Device	Types 1 and 2 Diabetes	\$33,461.00
47	Bookwalter Retractor System	Codman & Shurtleff	Medical Device	Surgery	\$33,409.93
48	Ablation Catheters/Accessories	Biosense Webster	Medical Device	Cardiac Arrhythmia	\$31,119.00
49	Neoss	Wright Medical Technology	Medical Device	Orthopaedic	\$29,818.12
50	Tracleer	Actelion Pharmaceuticals US	Pharmaceutical	Hypertension	\$28,304.00

Total

\$5,575,987.18

Note: For purposes of this exhibit, when manufacturers disclosed one payment for marketing several different products, the Attorney General's Office allocated the entire payment to each of the products disclosed in connection with the payment. For purposes of this exhibit, the Attorney General's Office has excluded products in research and development that, as of yet, lack a trade name. Where applicable, primary indication is as according to the FDA.

Exhibit 11: Expenditures by Primary Indication of the 50 Products with the Greatest Expenditures, FY08-FY11

FY11 Rank	Primary Indication	FY08 Expenditure Total	FY09 Expenditure Total	FY10 Expenditure Total	FY11 Expenditure Total
1	Diabetes**	\$402,650.29	\$249,462.85	\$152,177.07	\$897,401.99
2	Multiple Sclerosis	\$124,341.09	\$151,750.70	\$109,014.36	\$536,255.38
3	Rheumatoid Arthritis	\$40,008.99	\$16,101.26		\$453,180.95
4	Cholesterol	\$163,450.25	\$108,851.27		\$449,484.05
5	Bipolar Disorder and/or Schizophrenia	\$76,605.66	\$145,028.09	\$23,652.43	\$446,506.05
6	HIV				\$446,038.05
7	General Anesthesia				\$445,479.05
8	Imaging				\$149,416.09
9	Hypertension	\$259,220.41	\$116,204.19	\$25,268.07	\$147,713.98
10	Birth Control			\$17,809.00	\$143,310.00
11	Hyperlipidemia				\$136,860.42
12	Attention-Deficit/Hyperactivity Disorder	\$217,983.72	\$139,257.97	\$112,709.10	\$131,420.40
13	Growth Hormone Deficiency				\$127,479.00
14	Major Depressive Disorder				\$101,588.77
15	Anticoagulant	\$54,661.22	\$60,528.23		\$83,744.00
16	Electrophysiology				\$72,604.75
17	Hepatitis C		\$18,239.51		\$69,775.00
18	Laparoscopic Surgery				\$63,305.33
19	Urinary Incontinence				\$62,785.11
20	Nausea and Vomiting				\$60,965.59
21	Systolic Dysfunction				\$56,719.00
22	Asthma	\$53,903.52		\$13,126.57	\$45,057.59
23	Leads				\$44,657.54
24	Bone Graft Substitute				\$43,814.32
25	Coronary Stent System				\$43,437.50
26	Migraines		\$92,568.41	\$54,792.08	\$39,736.04

FY11 Rank	Primary Indication	FY08 Expenditure Total	FY09 Expenditure Total	FY10 Expenditure Total	FY11 Expenditure Total
27	Stroke	\$23,110.66	\$18,775.18		\$38,977.03
28	Human Papillomavirus				\$38,198.85
29	Fibromyalgia				\$36,593.32
30	Acute Bacterial Skin and Skin Structure Infections				\$35,600.70
31	Parkinsons Disease		\$19,546.67		\$33,534.28
32	Surgery				\$33,409.93
33	Cardiac Arrhythmia				\$31,119.00
34	Orthopaedic				\$29,818.12
*	Acute Coronary Syndrome			\$22,530.53	
*	Allergy	\$30,218.92			
*	Alzheimer's	\$188,966.05	\$26,733.30		
*	Angle Glaucoma or Ocular Hypertension			\$17,695.00	
*	Artificial Lens			\$32,250.00	
*	Bacterial Infections		\$23,196.53		
*	Benign Prostatic Hyperplasia	\$20,610.66	\$23,004.64		
*	Chronic Iron Overload			\$11,603.27	
*	Cosmetic Treatment for Face			\$12,375.00	
*	Crohn's Disease			\$10,297.01	
*	Cronic Obstructive Pulmonary Disease	\$34,824.52	\$49,123.20		
*	Cystic Fibrosis			\$16,060.00	
*	Deep Vein Thrombosis	\$18,117.00		\$18,154.00	
*	Depression, Anxiety	\$242,730.07	\$344,227.30	\$126,245.53	
*	Diabetes (Type 1 Only)	\$42,653.25	\$122,159.72		
*	Diagnostic Radiopaque Media			\$18,750.00	
*	Dry Eye Disease			\$17,666.00	
*	Emergency Assistance			\$36,012.00	
*	End Stage Renal Disease			\$14,344.00	
*	Gerd		\$23,229.53		

Exhibit 11-2

FY11 Rank	Primary Indication	FY08 Expenditure Total	FY09 Expenditure Total	FY10 Expenditure Total	FY11 Expenditure Total
*	Gout		\$16,599.31		
*	HER2 Overexpressing Breast Cancer			\$13,327.85	
*	Hunter Syndrome			\$14,344.00	
*	Idiopathic Thrombocytopenic Purpura			\$17,120.20	
*	Metastatic Colorectal Cancer			\$18,416.45	
*	Myeloma and/or Mantle Cell Lymphoma	\$27,767.00	\$21,906.00	\$57,549.00	
*	Ocular Itching			\$17,642.00	
*	Osteoporosis	\$20,097.73	\$36,453.02		
*	Overactive Bladder		\$49,555.94		
*	Pain	\$58,568.93	\$66,162.77	\$29,698.92	
*	Persistent Atrial Fibrillation or Atrial Flutter			\$27,395.00	
*	Prevention of Postoperative IOP			\$17,666.00	
*	Sleep Aid	\$20,436.33			
*	Smoking Cessation			\$16,448.54	
*	Thrombotic Cardiovascular Events			\$12,285.58	
*	Treatment of Opioid Dependence		\$16,388.00		
*	Ulcerative Colitis		\$46,410.62	\$14,533.25	
Totals		\$2,120,926.27	2,001,464.21	1,118,957.81	\$5,575,987.18

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

** Denotes products that treat Type 2 Diabetes or both Type 1 and Type 2 Diabetes.

Note: For purposes of this exhibit, when manufacturers disclosed one payment for marketing several different products, the Attorney General's Office allocated the entire payment to each of the products disclosed in connection with the payment.

Exhibit 12: Expenditure by Payment Nature with Breakdown of “Other”, FY11

Payment Nature	Expenditure Total	Pharmaceutical Expenditure Total	Minimum Expenditure	Maximum Expenditure	Median Expenditure	Number of Expenditures	Number of Recipients
Cash, Check, or Credit Card	\$4,802,143.01	\$3,427,172.99	\$0.58	\$400,000.00	\$250.00	2,524	392
Educational Materials	\$676,405.91	\$524,871.91	\$0.00	\$127,479.00	\$14.00	1,327	238
Demo/Evaluation Unit	\$79,632.77	\$0.00	\$0.00	\$21,667.00	\$0.00	239	86
Other	\$66,709.38	\$563.52	\$0.00	\$63,305.33	\$2.00	74	42
Loan of Medical Device	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	113	18
Totals	\$5,624,891.07	\$3,952,608.42	—	—		4,277	—
Overall Median Expenditure					\$70.00		

Other Payment Nature	Expenditure Total	Minimum Expenditure	Maximum Expenditure	Number of Expenditures
Product	\$63,837.37	\$153.72	\$63,305.33	30
Product Training	\$2,241.80	\$2,241.80	\$2,241.80	1
Gift	\$550.21	\$28.94	\$115.69	18
(Left Blank)	\$80.00	\$0.00	\$10.00	25
Totals	\$66,709.38		—	74

Exhibit 13: Expenditure by Payment Purpose with Breakdown of “Other”, FY11

Purpose of Payment	Expenditure Total	Pharmaceutical Expenditure Total	Minimum Expenditure	Maximum Expenditure	Median Expenditure	Number of Expenditures	Number of Recipients
Bona fide Clinical Trial - Gross Compensation	\$1,439,635.33	\$1,221,030.82	\$14.64	\$101,376.00	\$2,500.00	265	32
Other FMV Payment	\$768,492.25	\$711,141.25	\$2.00	\$400,000.00	\$495.00	399	57
Educational Materials	\$661,965.23	\$524,796.71	\$0.00	\$127,479.00	\$14.00	1,305	222
Research Project - Gross Compensation	\$600,153.62	\$249,950.00	\$200.00	\$89,487.00	\$3,506.00	63	7
Consulting/Surveys	\$457,444.58	\$132,037.44	\$5.00	\$46,594.04	\$388.00	269	59
Faculty Honoraria/Speaker Fee	\$449,145.16	\$390,533.06	\$20.00	\$8,050.00	\$1,750.00	240	49
Conference Sponsorship	\$391,965.85	\$257,413.44	\$250.00	\$84,500.00	\$1,007.95	82	27
Other	\$238,643.47	\$63,125.09	\$0.00	\$70,000.00	\$15.02	421	180
Bona fide Clinical Trial - Salary Support	\$228,850.45	\$228,850.45	\$27.00	\$31,349.00	\$2,800.00	44	4
Faculty Expense	\$102,206.76	\$93,789.57	\$1.46	\$8,401.00	\$75.00	408	34
Medical Device - Loans, Demos	\$78,871.90	\$0.00	\$0.00	\$21,667.00	\$0.00	351	96
Bona fide Clinical Trial - Expenses	\$71,316.39	\$60,825.59	\$0.00	\$6,272.00	\$202.38	76	13
Medical Device Training - Other Expenses	\$70,275.58	\$0.00	\$0.58	\$8,431.28	\$40.32	307	107
Research Project - Salary Support	\$25,317.28	\$8,500.00	\$3,083.52	\$9,840.00	\$6,196.88	4	2
Gift to Institution/Organization	\$23,592.84	\$10,615.00	\$23.00	\$7,500.00	\$1,053.92	12	7
Research Project - Expenses	\$10,944.34	\$0.00	\$0.00	\$3,925.80	\$164.35	27	4
Medical Device Training - Compensation	\$4,570.04	\$0.00	\$270.04	\$2,150.00	\$2,150.00	3	2
Scholarship	\$1,500.00	\$0.00	\$1,500.00	\$1,500.00	\$1,500.00	1	1
Totals	\$5,624,891.07	\$3,952,608.42	—	—		4,277	

Overall Median Expenditure

\$70.00

Other Purpose of Payment	Expenditure Total	Minimum Expenditure	Maximum Expenditure	Number of Expenditures
Grant	\$142,336.00	\$1,000.00	\$70,000.00	8
Fellowship	\$56,000.00	\$16,000.00	\$40,000.00	2
Gift/Meal	\$29,176.83	\$1.00	\$21,112.88	363
Other Research	\$5,386.00	\$5,386.00	\$5,386.00	1
Product/Training	\$4,483.04	\$33.72	\$2,241.80	15
Display	\$1,000.00	\$1,000.00	\$1,000.00	1
(Left Blank)	\$237.60	\$0.00	\$139.00	30
Other Travel Expenses	\$24.00	\$24.00	\$24.00	1
Totals	\$238,643.47	-	-	421

Exhibit 14: Minimum Clinical Trial Information, FY11

Trial Name		Start Date	Link to National Clinical Trial Registry
1	Limited access protocol for the use of oral Cisapride in the treatment of refractory gastroesophageal reflux disease and other gastrointestinal motility disorders (CIS-USA-154)	May, 2000	N/A: This is a limited access program that does not recruit patients.
2	Docetaxel or Pemetrexed With or Without Celuximab in Patients With Recurrent or Progressive Non-Small Cell Lung Cancer	January, 2005	http://clinicaltrials.gov/show/NCT00095199
3	SPIRIT III Clinical Trial of the XIENCE @ Everolimus Eluting Coronary Stent System (EECSS)	September, 2005	http://clinicaltrials.gov/ct2/show/NCT000180479?term=NCT00180479&rank=1
4	SPIRIT IV Clinical Trial: Clinical Evaluation of the XIENCE V @ Everolimus Eluting Coronary Stent System	March, 2006	http://clinicaltrials.gov/ct2/show/NCT00307047?term=NCT00307047&rank=1
5	Reducing Decompensation Events Utilizing Intracardiac Pressures in Patients With Chronic Heart Failure (REDUCEhf)	April, 2006	http://clinicaltrials.gov/ct2/show/NCT00354159
6	Levodopa-Carbidopa Intestinal Gel Open-Lab Study in Advance PD	June, 2006	http://clinicaltrials.gov/ct2/show/NCT00335153?term=NCT00335153&rank=1
7	Study of Efficacy, Safety and Tolerability of Levodopa-Carbidopa Intestinal Gel in Levodopa-Responsive Parkinson's Subjects	July, 2006	http://clinicaltrials.gov/ct2/show/NCT00357994?term=NCT00357994&rank=1
8	Safety/Efficacy Study of Levodopa-Carbidopa Intestinal Gel in Parkinson's Subjects	August, 2006	http://clinicaltrials.gov/ct2/show/NCT00360568?term=NCT00360568&rank=1
9	CHOICE: Carotid Stenting For High Surgical-Risk Patients	September, 2006	http://clinicaltrials.gov/ct2/show/NCT00406055?term=NCT00406055&rank=1
10	A Prospective, Randomized, Double-Blind, Parallel-Group, Multicenter, Non-inferiority Study Comparing the Efficacy and Safety of Rivaroxaban (BAY 59-7939) With Warfarin for the Prevention of Stroke and Non-Central Nervous System Systemic Embolism in Subjects With Non-Valvular Atrial Fibrillation	December, 2006	http://clinicaltrials.gov/ct2/show/NCT00403767?term=ROCKET&rank=5

	Trial Name	Start Date	Link to National Clinical Trial Registry
11	A Phase II, Multi-Center, Randomized, Double-Blind Placebo-Controlled, Safety, Tolerability, and Efficacy Study of Add on Cladribine Tablet Therapy with Interferon-beta (IFN-β) Treatment in Multiple Sclerosis Subjects with Active Disease (ONWARD)	December, 2006	http://clinicaltrials.gov/ct2/show/NCT00436826?term=ONWARD&rank=1
12	109MS301	January, 2007	http://clinicaltrials.gov/ct2/show/NCT01064401?term=biogen+idec%2C+109MS301&rank=1
13	A Multicenter, Prospective, Long-term, Observational Registry of Pediatric Patients with Inflammatory Bowel Disease	March, 2007	http://clinicaltrials.gov/ct2/show?term=PEDIATRIC+IBD&rank=5
14	109MS302	June, 2007	http://clinicaltrials.gov/ct2/show/NCT00451451?term=biogen+idec%2C+109MS302&rank=1
15	EFC10547	December, 2007	http://clinicaltrials.gov/ct2/show/NCT00574275
16	EFC6260	February, 2008	http://clinicaltrials.gov/ct2/show/NCT00622700
17	Open Label Continuation Treatment Study With Levodopa-Carbidopa Intestinal Gel in Advanced PD	April, 2008	http://clinicaltrials.gov/ct2/show/NCT00660673?term=NCT00660673&rank=1
18	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)	June, 2008	http://clinicaltrials.gov/ct2/show/NCT00624468?term=Atacept++Optic+Neuritis&rank=1

	Trial Name	Start Date	Link to National Clinical Trial Registry
19	RESOLUTE U.S.	July, 2008	http://clinicaltrials.gov/ct2/show/NCT00726453
20	Chemotherapy and Radiation in Treating Patients With Stage 3 Non-Small Cell Lung Cancer	September, 2008	http://clinicaltrials.gov/show/NCT00686959
21	CO743T26 A Phase 2b, Multicenter, Randomized, Double-blind, Placebocontrolled, Parallel-group Study to Evaluate the Efficacy and Safety of Ustekinumab Therapy in Subjects with Moderately to Severely Active Crohn's Disease Previously Treated with TNF Antagonist Therapy	October, 2008	http://clinicaltrials.gov/ct2/show/NCT00771667?term=NCT00771667&rank=1
22	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	October, 2008	http://clinicaltrials.gov/ct2/show/NCT00786201?term=cnto888+AND+pulmonary+fibrosis&rank=1
23	Juvenile Idiopathic Arthritis (JIA) Registry (STRIVE)	October, 2008	http://clinicaltrials.gov/ct2/show/NCT00783510?term=NCT00783510&rank=1
24	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	http://clinicaltrials.gov/ct2/show/NCT00809965?term=Rivaroxaban+AND+acute+coronary+syndrome&rank=1
25	DRI10566	December, 2008	http://clinicaltrials.gov/ct2/show/NCT00811902

	Trial Name	Start Date	Link to National Clinical Trial Registry
26	109MS303	February, 2009	http://clinicaltrials.gov/ct2/show/NCT00835770?term=biogen+idec%2C+109MS303&rank=1
27	Treatment for Aggression and Agitation in Patients With Alzheimer's Disease	February, 2009	http://clinicaltrials.gov/show/NCT00843518
28	NCT00772343	February, 2009	http://clinicaltrial.gov/ct2/show/NCT00772343?term=H-030-011&rank=1
29	A Boston Scientific Trial of the EPIC™ Nitinol Stent System in the Treatment of Atherosclerotic Lesions in Iliac Arteries (ORION)	May, 2009	http://clinicaltrials.gov/ct2/show/NCT00896337?term=Iliac+stenting&rank=7
30	Effect of LY2062430 on the Progression of Alzheimer's disease (Start)	May, 2009	http://clinicaltrials.gov/show/NCT00905372
31	A Double-Blind, Placebo-Controlled Study of Caripazine (RGH-188) As Adjunctive Therapy In Major Depressive Disorder	June, 2009	http://clinicaltrials.gov/ct2/show/NCT00854100?spons=%22Forest+Laboratorie s%22&spons_ex=Y&state1=NA%3AUS%3AVT&rank=1
32	A Double-blind, Placebo-controlled Study of RGH-188 (Cariprazine) in Bipolar Depression	June, 2009	http://clinicaltrials.gov/ct2/show/NCT00852202?spons=%22Forest+Laboratorie s%22&spons_ex=Y&state1=NA%3AUS%3AVT&rank=2
33	Evaluation of Dalteparin for Long-term (One Year) Treatment of Blood Clots in Subjects With Cancer (phase IV)	June, 2009	http://clinicaltrials.gov/ct2/show/NCT00942968?term=Evaluation+of+Dalteparin+for+Long-term+%28One+Year%29+Treatment+of+Blood+Clots+in+Subjects+With+Cancer+%28phase+IV%29&rank=1
34	SPIRIT PRIME Clinical Trial	June, 2009	http://clinicaltrials.gov/ct2/show/NCT00916370?term=NCT00916370&rank=1
35	A Study in Relapse Prevention of Treatment-resistant Depression	August, 2009	http://clinicaltrials.gov/show/NCT00958568
36	A Double-blind, Placebo-Controlled, Flexible-Dose Study of F2695 SR in Patients With Major Depressive Disorder	September, 2009	http://clinicaltrials.gov/ct2/show/NCT00969150?spons=%22Forest+Laboratorie s%22&spons_ex=Y&state1=NA%3AUS%3AVT&rank=5
37	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	http://clinicaltrials.gov/ct2/show/NCT00955279?term=Sarcoidosis&rank=27

	Trial Name	Start Date	Link to National Clinical Trial Registry
38	ACT-128800 in Relapsing-remitting Multiple Sclerosis	October, 2009	http://clinicaltrials.gov/ct2/show/NCT01006265?term=actelion+and+ms&rank=2
39	COMPASS-HF	October, 2009	http://clinicaltrials.gov/ct2/show/NCT00991120?term=nct00991120&rank=1
40	A Long-Term, Randomized, Double-Blind Study of the Safety, Tolerability and Efficacy of Acclidinium Bromide At Two Dosage Levels When Administered to Patients With Moderate to Severe, Stable Chronic Obstructive Pulmonary Disease	November, 2009	http://clinicaltrials.gov/ct2/show/NCT01044459?spons=%22Forest+Laboratories%22&spons_ex=Y&state1=NA%3AUS%3AVT&rank=7
41	Adaptive Cardiac Resynchronization Therapy Study (aCRT)	November, 2009	http://clinicaltrials.gov/ct2/show/NCT00980057
42	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	http://clinicaltrials.gov/ct2/show/NCT01034267?spons=%22Forest+Laboratories%22&spons_ex=Y&state1=NA%3AUS%3AVT&rank=8
43	101JC402	April, 2010	http://clinicaltrials.gov/ct2/show/NCT01070836?term=101JC402&rank=1
44	EDUCATE	April, 2010	http://clinicaltrials.gov/ct2/show/NCT01069003
45	(Defeat-HF) - Determining the Feasibility of Spinal Cord Neuromodulation for the Treatment of Chronic Heart Failure	April, 2010	http://clinicaltrials.gov/ct2/show/NCT01112579
46	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	http://clinicaltrials.gov/ct2/show/NCT01106625?term=canagliflozin&rank=13
47	A Prospective, Multicenter, Randomized, Double-Blind, Placebo-Controlled Trial Comparing REMICADE® (infliximab) and Placebo in the Prevention of Relapse in Crohn's Disease Patients Undergoing Ileocolonic Resection	August, 2010	http://clinicaltrials.gov/ct2/show/NCT01190839

	Trial Name	Start Date	Link to National Clinical Trial Registry
48	CHAMPION-PHOENIX Study	September, 2010	http://clinicaltrials.gov/ct2/show/NCT01156571
49	Continued Safety Monitoring of Solanezumab in Alzheimer's Disease	December, 2010	http://clinicaltrials.gov/show/NCT01127633
50	A Study in Patients With Rheumatoid Arthritis	January, 2011	http://clinicaltrials.gov/show/NCT01202773
51	DRI10734	February, 2011	http://clinicaltrials.gov/ct2/show/NCT01266525
52	SuperNOVA Clinical Stenting Trial	April, 2011	http://clinicaltrial.gov/ct2/show/NCT01292928?term=supernova&rank=1
53	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 Systems (RAS) Inhibitor (RADAR)	April, 2011	http://clinicaltrials.gov/ct2/show/NCT01356849?term=NCT01356849&rank=1