

**Prescribed Product Disclosures  
For Reporting Year 2017**

**Report of  
Vermont Attorney General  
Thomas J. Donovan, Jr.  
October 2020**

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**I. Summary**

This publication is the Vermont Attorney General’s sixteenth report on Prescribed Product Disclosures. It is based upon disclosures of expenditures and sampling activity by manufacturers of pharmaceuticals, biologics (e.g., vaccines) and medical devices (e.g., artificial hips, hearing aids, and scopes) engaged in during Reporting Year 2017 (“RY 2017”), ranging from January 1, 2017, through December 31, 2017. 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.<sup>1</sup>

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](http://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 fourth 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.

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, some manufacturers voluntarily have reported to Vermont their expenditures to physicians; an increasing number of manufacturers have not. Because the

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<sup>1</sup> 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 manufacturer’s underlying conduct.

disclosures to Vermont provide a less-than-full scope of the expenditure activity that took place in 2017, 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 2017 reveal that 165 manufacturers reported distributing 65,534 samples and spending approximately 3.8 million dollars<sup>2</sup> to Vermont health care providers, institutions and organizations. **Exhibit 1**. Only five manufacturers distributed 3,000 or more samples, and 67 manufacturers disclosed no sample activity at all. **Exhibit 1**.

The five manufacturers with the highest sample distribution during 2017 were: (1) Pfizer, (2) GlaxoSmithKline, (3) Abbott Laboratories, (4) Allergan, and (5) Alcon Laboratories. **Exhibits 1 and 2**. GlaxoSmithKline and Pfizer are the only manufacturers which have been in the top five for sampling for the past five years of sample reporting. **Exhibit 2**.

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 55% in 2017 (compared with 57% in 2016 , 54% in 2015, 53% in 2014, and 60% in 2013.. **Exhibit 2**.

### ***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. In RY 2017, a total of 33 health care providers received 14,284 samples, a figure that has decreased markedly from Reporting Year 2012, when 43 health care providers received more than 21,000 samples. 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 each year. **Exhibit 3**.

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<sup>2</sup> 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. For instance, it may not include expenditures received by teaching hospitals and their physicians.

## *Products*

As in years past, pharmaceuticals dominated the percentage of the total number of samples distributed at nearly 72% of prescribed products sampled (compared with 69% in 2016, 56% in 2015, 92% in 2014, and 73% in 2013.). **Exhibit 4.**

The top 50 products by sample distribution were associated with the delivery of between 412 and 3,268 samples each. Of those products, 39 (78%) were pharmaceuticals, 7 (14%) were infant formula, 2 (4%) were medical devices, 1 (2%) was Medical Equipment/Supplies 1 (2%) was medical food. The 10 products sampled most frequently in 2017 accounted for 21,139 samples, or 32% of all samples distributed in 2017. **Exhibits 1 & 5.**

Analyzing the RY 2017 primary indications of the 50 products with the greatest number of samples, the three most prevalent indications were Chronic Obstructive Pulmonary Disease (COPD), infant feeding and asthma, which were associated with about 8,806 6,088 and 3,980 samples respectively. **Exhibit 6.**

## *Samples*

Of approximately 65,000 samples distributed in RY 2017 (**Exhibit 1**), more than 44,000 (67%) contained products, over 16,000 (25%) contained vouchers or coupons for free or reduced-price products, and more than 8,000 (13%) contained other items, such as educational materials, non-prescribed items and cases/holders. 1,700 (3%) samples included two kinds of items (product, vouchers or other), and 992 (2%) 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 other 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 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 2013.

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 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; 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](http://www.ago.vermont.gov), disclosures of the distribution of samples have not.

Research continues to show that healthcare professionals who receive payments or gifts from drug and device makers—even just a meal—prescribe a higher percentage of the brand name drugs being promoted. See, *inter alia*, DeJong, Colette et al., *Pharmaceutical Industry-Sponsored Meals and Physician Prescribing Patterns for Medicare Beneficiaries*, 176 JAMA Intern. Med. 1116, 1120- (2016); Ornstein, Charles et al., *Dollars for Doctors*, ProPublica, (Mar.17, 2016) <https://www.propublica.org/article/doctors-who-take-company-cash-tend-to-prescribe-more-brand-name-drugs>; etc. .

### **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 2017, the Attorney General did not pursue any enforcement actions. Copies of past settlements and payments received, can be found on the Attorney General’s Website: [www.ago.vermont.gov](http://www.ago.vermont.gov).

### **IV. Conclusion**

Vermont’s Prescribed Product Gift Ban and Disclosure Law continues to be an important public policy consideration in Vermont’s effort to contain prescription drug costs. Large pharmaceutical companies continue to dominate in sample distribution. The number of recipients who have received 250 or more samples has trended downward from 2012 to 2017. Vermont will continue to monitor manufacturer distribution of gifts and samples in its ongoing efforts to contain the rising cost of prescribed products.

Exhibit 1 - Samples and Expenditures by Manufacturer 2017

Manufacturer	Number of Samples	Number of Expenditures	Expenditure Total
PFIZER INC.	8504	27	206947
GlaxoSmithKline, LLC	8184	30	52081.84
Abbott Laboratories	8038	344	13708.1757
Allergan Inc.	6634	13	31405
Alcon Laboratories, Inc.	5062	2	3118.51
Boehringer Ingelheim Pharmaceuticals, Inc.	2796	7	42081.34
Takeda Pharmaceuticals U.S.A., Inc.	2374	34	97180.67
Eli Lilly and Company	2178	63	680864
Merck Sharp & Dohme Corporation	2000	134	199664.57
Depomed	1906	12	49.64
CooperVision	1840		
Novo Nordisk	1586		
Sunovion Pharmaceuticals Inc.	1580		
Oticon Inc	1018	31	1139.72
Shire North American Group Inc	996	4	16003.54
Astellas Pharma US	988	4	2175
Bristol-Myers Squibb Company	889	13	20507.87
sanofi-aventis U.S.	838	9	14719.32
Janssen Pharmaceuticals, Inc.	826	549	501652
COLGATE ORAL PHARMACEUTICALS, INC.	727	202	11930
ASTRAZENECA	722	48	117573.09
3M Company	710	67	1615.5882
Purdue Pharma L.P.	608	1	5212
AbbVie	322	44	75417
Lundbeck LLC	312	6	29
Roche Diabetes Care, Inc-	256		
Galderma Laboratories, L.P.	250	71	59887.75
Impax Laboratories, Inc.	206	30	2404
Mylan Pharmaceuticals Inc.	200	14	1591.7283
LifeScan, Inc	188	1	437.74
Valeant Pharmaceuticals International	172	6	1024
Mylan Specialty L.P.	158	16	1779.9602
MSD Oss B.V. a subsidiary of Merck & Co. Inc	156		

Exhibit 1 - Samples and Expenditures by Manufacturer 2017

Amgen Inc.	134	23	204961.1935
MSD CORP	132		
Otsuka America Pharmaceutical, Inc.	130	1	3
Indivior Inc.	126	2	78
MISSION PHARMACAL COMPANY	104		
Ironwood Pharmaceuticals Inc.	96		
Johnson & Johnson Vision Care, Inc.	90	2	928
Merit Medical Systems, Inc.	90		
Medtronic plc	84	26	6205.7282
Bayer HealthCare Pharmaceuticals Inc.	78	5	71354.9
Alkermes, Inc.	76	6	1512.6
Cardinal Health, Inc-	74		
Ortho Clinical Diagnostics	72	1	18.51
TEVA Pharmaceutical Industries Ltd	66		
Genzyme Corporation	60	5	2541.65
LEO Pharma Inc.	58	1	5000
Novartis Pharmaceutical Corporation	58	22	7940.2
Peter Brasseler Holdings, LLC	56		
Regeneron Healthcare Solutions, Inc.	56	3	2196.47
Exelixis Inc.	54	1	1000
Boston Scientific Corporation	50	16	7904.23
ACADIA Pharmaceuticals Inc	42		
Becton Dickinson	42	1	5803.26
Genentech, Inc.	40	7	103492.38
ASCEND Therapeutics US, LLC	38	59	17.29
Leica Microsystems, Inc.	36		
Cook Medical Inc.	32	1	3387.624
Avanir Pharmaceuticals, Inc.	28	13	72794.79
Insulet Corporation	26		
Hollister Incorporated	24		
Merz North America, Inc.	24		
Iroko Pharmaceuticals, LLC	20		
Roche Diagnostics Corporation	20	20	25752.22
Covis Pharma B-V-	18		



Exhibit 1 - Samples and Expenditures by Manufacturer 2017

Janssen Biotech, Inc.	18	13	49128
Keryx Biopharmaceuticals, Inc.	16	6	1710.01
Nestlé HealthCare Nutrition, Inc-	14		
Smith & Nephew, Inc.	12	48	13422.2
Gilead Sciences, Inc.	10	2	13624.17
Aries Pharmaceuticals, Inc.	8	7	4978
B. Braun Medical Inc.	8	1	3.19
Mayne Pharma Inc.	8		
Noden Pharma USA, Inc.	8		
Pacira Pharmaceuticals Incorporated	8	1	5
ConvaTec Inc.	6	1	3.15
Endo Pharmaceuticals Inc.	6		
Ferring Pharmaceuticals Inc.	6	7	26036.78
B- Braun Interventional Systems Inc	4		
IPSEN BIOPHARMACEUTICAL	4		
Ipsen Biopharmaceuticals, Inc.	4	3	1539.85
MIST PHARMACEUTICALS	4		
Radius Health, Inc.	4	3	18.71
Shionogi Inc	4		
Antares Pharma, Inc-	2		
ASCENSIA DIABETES CARE	2		
Baxter Healthcare Corporation	2	2	50046.53
Coloplast Corp.	2		
CONMED Corporation	2		
DENTSPLY SIRONA INC	2		
electroCore, LLC	2		
Fresenius Medical Care NA	2		
Neurocrine Biosciences, Inc.	2	2	3000
Terumo Medical	2		
VANDA PHARMACEUTICALS, INC	2		
Vermont Regional Sleep Center	2		
Acclarent, Inc.		2	1960
Acorda Therapeutics, Inc		4	22769
Alexion Pharmaceuticals, Inc.		2	11.5

Exhibit 1 - Samples and Expenditures by Manufacturer 2017

Arthrex, Inc.		3	16
Biogen, Inc.		18	32493.59
Bio-Rad Laboratories, Inc.		20	6634
Biosense Webster Inc.		12	102988
Bioventus LLC		1	48.63
C.R. Bard, Inc. & Subsidiaries		5	4774
Change Healthcare Technologies, LLC		9	4075
Cochlear Americas		19	7452.72
Collegium Pharmaceutical, Inc.		8	20.48
CooperSurgical, Inc.		1	19.63
Corcept Therapeutics		2	32.5
Daiichi Sankyo, Inc		7	1237.8492
DePuy Orthopaedics, Inc.		123	88082
Draeger Medical Systems, Inc.		2	2000
Duchesnay Usa Incorporated		8	2.42
Edwards Lifesciences		9	1934
Egalet US Inc		8	7.7
Eisai Inc.		227	325549.25
Ethicon, Inc.		6	8581.89
GE Healthcare		6	2100
Grifols USA, LLC		6	17573.94
Henry Schein, Inc.		3	20137.68
Hill-Rom Holdings, Inc.		3	1479.65
Hu-Friedy Mfg. Co., LLC		34	1045
Incyte Corporation		2	3520
Integra LifeSciences Corporation		16	506.85
Intuitive Surgical, Inc.		98	56947.3
Janssen Therapeutics		3	5700
Johnson & Johnson Surgical Vision, Inc.		2	881
KARLSTORZ Endoscopy-America		40	825
KCI USA, Inc		1	13
Lilly USA LLC		1	41403
Luitpold Pharmiceuticals		3	19787.5
MALLINCKRODT PHARMACEUTICALS		6	9200

Exhibit 1 - Samples and Expenditures by Manufacturer 2017

McKesson Medical-Surgical Minnesota Supply Inc.		2	487.66
McKesson Technologies, Inc.		5	3125
Medicines360		1	0
Medline Industries, Inc.		179	12971.22
Mentor Worldwide LLC		1	608
Millennium Pharmaceuticals, Inc.		4	26960.07
Mitsubishi Tanabe Pharma America, Inc.		1	1500
Molnlycke Health Care US, LLC		9	4269
Mylan Institutional Inc.		1	55.6025
Myriad Genetic Laboratories, Inc.		1	1936
Octapharma USA, Inc.		2	9
Olympus Corporation of the Americas		23	700
Optinose US, Inc.		3	2919.75
Pharmacyclics LLC, An AbbVie Company		7	5632
Philips Electronics North America Corporation		2	7049.62
Puma Biotechnology, Inc.		2	2000
Retrophin Inc		1	0.94
Roche Health Solutions, Inc.		30	14039.98
Sandoz Inc.		1	15
Sanofi Pasteur		13	2933.4
Sarepta Therapeutics		1	24.33
Straumann Manufacturing Inc.		1	
Strongbridge US INC.		1	9.3
Stryker Corporation		166	66423.36
Teleflex Incorporated		10	4121.48
TOLMAR Pharmaceuticals, Inc.		1	12.99
Vertex Pharmaceuticals Incorporated		10	2602.22
ViiVHealthcare		3	354.59
VIVUS, Inc.		1	809.93
Zimmer Biomet Holdings, Inc		2	12703.1697
<b>Totals</b>	<b>65534</b>	<b>3297</b>	<b>\$3,814,691.38</b>

**Exhibit 2: Top Five Manufacturers with Most Samples, 2013-2017**

<b>Rank by Number of Samples</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
<b>1</b>	<b>AstraZeneca</b>	<b>Pfizer</b>	<b>GlaxoSmithKline</b>	<b>GlaxoSmithKline2</b>	<b>Pfizer3</b>
2	GlaxoSmithKline	GlaxoSmithKline	Abbott Laboratories	Abbott Laboratories	GlaxoSmithKline
3	Pfizer	AstraZeneca	Pfizer	Allergan	Abbott Laboratories
4	Allergan	Forest Laboratories	Alcon Laboratories	Pfizer	Allergan
5	Abbott Laboratories	Eli Lilly and Company	Astrazeneca	Alcon Laboratories	Alcon Laboratories
Number of Samples for Top 5 Manufacturers	32,172	23,914	29,356	26,229	36,008
Percentage of Overall Sample Total Attributable to Top 5 Manufacturers	60%	53%	54%	57%	55%



**Exhibit 4: Samples and Expenditures by Product Type, 2017**

<b>Product Type</b>	<b>Number of Samples</b>	<b>Percent Number of Samples</b>	<b>Number of Expenditures</b>	<b>Percent Number of Expenditures</b>	<b>Expenditure Total*</b>	<b>Percent Expenditure Total</b>
Pharmaceuticals	56082	71.72%	1744	42.05%	\$4,398,596.66	64.28%
Medical Devices	7142	9.13%	2023	48.78%	\$1,030,394.87	15.06%
Infant Formula	9980	12.76%				
Medical Food	2346	3.00%				
Medical Equipment/Supplies	1238	1.58%				
Combination Product	942	1.20%	5	0.12%	\$8,893.14	0.13%
Biologics	470	0.60%	172	4.15%	\$1,388,887.16	20.30%
Other			203	4.90%	\$16,060.94	0.23%
<b>Totals</b>	<b>78,200</b>		<b>4,147</b>		<b>\$6,842,832.77</b>	

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 5: Top Products - 50 Products with Greatest Number of Samples, 2017**

Rank	Product Name	Manufacturer	Product Type	Primary Indication	Number of Samples
1	Nexium	Pfizer	Pharmaceuticals	Gastroesophageal Reflux Disease (GERD)	3,268
2	Spiriva	Boehringer Ingelheim	Pharmaceuticals	Chronic Obstructive Pulmonary Disease (COPD)	2,838
3	Eliquis	Bristol-Myers Squibb Company; Pfizer	Pharmaceuticals	Stroke	2,497
4	Advair	GlaxoSmithKline	Pharmaceuticals	Asthma	2,222
5	PediaSure	Abbott Laboratories	Medical Food	Nutrition	2,214
6	Breo	GlaxoSmithKline	Pharmaceuticals	Chronic Obstructive Pulmonary Disease (COPD)	2,064
7	Systane Balance	Alcon Laboratories, Inc-	Pharmaceuticals	Dry Eyes	1,572
8	Systane Ultra	Alcon Laboratories, Inc-	Pharmaceuticals	Dry Eyes	1,548
9	Viagra	Pfizer	Pharmaceuticals	Erectile Dysfunction	1,484
10	Latuda	Sunovion Pharmaceuticals Inc.	Pharmaceuticals	Schizophrenia	1,432
11	Similac Pro-Advance HMO	Abbott Laboratories	Infant Formula	Infant Formula	1,418
12	O-F PM 20Z Starter Kit	Alcon Laboratories	Medical Devices	Eye Care	1,390
13	Stiolto Respimat	Boehringer Ingelheim	Pharmaceuticals	Chronic Obstructive Pulmonary Disease (COPD)	1,334
14	Anoro	GlaxoSmithKline	Pharmaceuticals	Chronic Obstructive Pulmonary Disease (COPD)	1,156
15	Similac Pro-Sensitive HMO Powder	Abbott Laboratories	Infant Formula	Infant Formula	1,092
16	Similac Alimentum	Abbott Laboratories	Infant Formula	Infant Formula	1,068
17	Hearing Aid Accessory	Oticon Inc	Medical Equipment/Supplies	Hard of Hearing	1,018
18	Nucynta/Nucynta ER	Depomed	Pharmaceuticals	Pain	984
19	Advil	Pfizer	Pharmaceuticals	Pain/Fever	948
20	Incruse	GlaxoSmithKline	Pharmaceuticals	Chronic Obstructive Pulmonary Disease (COPD)	912
21	Carton	Abbott Laboratories	Infant Formula	Infant Formula	874
22	Vraylar	Allergan Inc	Pharmaceuticals	Schizophrenia	874
23	Dexilant	Takeda Pharmaceuticals U.S.A	Pharmaceuticals	Erosive Esophagitis	868
24	Linzess	Allergan	Pharmaceuticals	Irritable Bowel Syndrome with Constipation	790
25	Belsomra	Merck Sharp & Dohme Corp	Pharmaceuticals	Insomnia	788
26	Bystolic	Allergan	Pharmaceuticals	Hypertension	744
27	Dulera	3M Company	Pharmaceuticals	Asthma	676
28	Lyrica	Pfizer	Pharmaceuticals	Neuropathic Pain	662
29	Similac Total Comfort	Abbott Laboratories	Infant Formula	Infant Formula	658
30	Gralise	Depomed	Pharmaceuticals	Postherpetic Neuralgia	650
31	Trintellix	Takeda Pharmaceuticals U.S.A.	Pharmaceuticals	Major Depressive Disorder	650
32	Xarelto	Janssen Pharmaceuticals	Pharmaceuticals	Stroke	632

**Exhibit 5: Top Products - 50 Products with Greatest Number of Samples, 2017**

<b>Rank</b>	<b>Product Name</b>	<b>Manufacturer</b>	<b>Product Type</b>	<b>Primary Indication</b>	<b>Number of Samples</b>
33	Viibryd	Allergan	Pharmaceuticals	Major Depressive Disorder	626
34	Colgate Sensitive	Colgate Oral Pharmaceuticals	Pharmaceuticals	Dental Care	612
35	Flovent	GlaxoSmithKline	Pharmaceuticals	Asthma	594
36	Lumigan	Allergan Inc-	Pharmaceuticals	Glaucoma	570
37	Xiidra	Shire North American Group	Pharmaceuticals	Dry Eyes	526
38	Pedialyte	Abbott Laboratories	Infant Formula	Infant Formula	524
39	Taltz	Eli Lilly and Company	Pharmaceuticals	Plaque Psoriasis	520
40	Oxycontin	Purdue Pharma L.P.	Pharmaceuticals	Pain	514
41	Accu-Chek Guide Sample Kit	Roche Diabetes Care	Medical Devices	Diabetes	508
42	Combigan	Allergan	Pharmaceuticals	Chronic Obstructive Pumonary Disease (COPD)	502
43	Rexulti	Lundbeck LLC	Pharmaceuticals	Major Depressive Disorder	492
44	Victoza	Novo Nordisk	Pharmaceuticals	Diabetes	492
45	Asmanex	Merck Sharp & Dohme	Pharmaceuticals	Asthma	488
46	Namzaric	Allergan	Pharmaceuticals	Alzheimer's	484
47	Levitra	GlaxoSmithKline	Pharmaceuticals	Erectile Dysfunction	466
48	OptiGro Similac Tolerance	Abbott Laboratories	Infant Formula	Infant Formula	454
49	Januvia	Merck Sharp & Dohme Corp	Pharmaceuticals	Diabetes	436
50	NovoLog	Novo Nordisk	Pharmaceuticals	Diabetes	412





Exhibit 6: Samples by Primary Indication of the top 50 Products with the Greatest Number of Samples, 2013 - 2017

Primary Indication	2013		2014		2015		2016		2017	
	# of Samples	Rank	# of Samples	Rank	# of Samples	Rank	# of Samples	Rank	# of Samples	Rank
Myocardial Infarction Preventative										
Nonvalvular Atrial Fibrillation			351	25						
Osteoarthritis	1,276	15	1,503	7	436	18				
Philadelphia Chromosome Positive Chronic Myeloid Leukemia										
Primary Hypogonadism										
Reversible Obstructive Airway Disease			333	27						
Smoking Cessation			477	23	256	25				
Various: Multiple Products	3,378	3	1,336	9						
<b>Totals:</b>	<b>50,602</b>		<b>36,142</b>		<b>43,824</b>		<b>33,455</b>		<b>50,545</b>	

**Exhibit 7: Contents of Sample by Category, 2013-2017**

2013		2014		2015		2016		2017	
<b>Product</b>		<b>Product</b>		<b>Product</b>		<b>Product</b>		<b>Product</b>	
Product Only	46,862	Product Only	28,786	Product Only	29,607	Product Only	25,990	Product Only	41,567
Product and Vouchers	105	Product and Vouchers	994	Product and Vouchers	703	Product and Vouchers	1,984	Product and Vouchers	636
Product and Other	2,107	Product and Other	786	Product and Other	720	Product and Other	734	Product and Other	990
Product, Vouchers and Other	1,112	Product, Vouchers and Other	17	Product, Vouchers and Other	4,216	Product, Vouchers, and Other	829	Product, Vouchers, and Other	992
<b>Total</b>	<b>50,186</b>	<b>Total</b>	<b>30,583</b>	<b>Total</b>	<b>35,246</b>	<b>Total</b>	<b>29,537</b>	<b>Total</b>	<b>44,185</b>
<b>Vouchers</b>		<b>Vouchers</b>		<b>Vouchers</b>		<b>Vouchers</b>		<b>Vouchers</b>	
Vouchers Only	16,361	Vouchers Only	12,858	Vouchers Only	9,804	Vouchers Only	10,043	Vouchers Only	14,859
Vouchers and Product	105	Vouchers and Product	994	Vouchers and Product	703	Vouchers and Product	1,984	Vouchers and Product	636
Vouchers and Other	246	Vouchers and Other	243	Vouchers and Other	873	Vouchers and Other	419	Vouchers and Other	74
Vouchers, Product and Other	1,112	Vouchers, Product and Other	17	Vouchers, Product and Other	4,216	Vouchers, Product, and Other	829	Vouchers, Product, and Other	992
<b>Total</b>	<b>17,824</b>	<b>Total</b>	<b>14,112</b>	<b>Total</b>	<b>15,596</b>	<b>Total</b>	<b>13,275</b>	<b>Total</b>	<b>16,561</b>
<b>Other</b>		<b>Other</b>		<b>Other</b>		<b>Other</b>		<b>Other</b>	
Other Only	1,164	Other Only	1,865	Other Only	7,821	Other Only	5,961	Other Only	6,416
Other and Vouchers	246	Other and Vouchers	243	Other and Vouchers	873	Other and Vouchers	419	Other and Vouchers	74
Other and Product	2,107	Other and Product	786	Other and Product	720	Other and Product	734	Other and Product	990
Product, Vouchers and Other	1,112	Product, Vouchers and Other	17	Product, Vouchers and Other	4,216	Other, Vouchers, and Product	829	Other, Vouchers, and Product	992
<b>Total</b>	<b>4,629</b>	<b>Total</b>	<b>2,911</b>	<b>Total</b>	<b>13,630</b>	<b>Total</b>	<b>7,943</b>	<b>Total</b>	<b>8,472</b>