

Prescribed Product Disclosures
For Reporting Year 2018

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

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**Prescribed Product Disclosures:
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For Reporting Year 2018**

I. Summary

This publication is the Vermont Attorney General’s seventeenth 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 2018 (“RY 2018”), ranging from January 1, 2018, through December 31, 2018. Vermont’s Prescribed Product Disclosure Law, 18 V.S.A. §§ 4631a, 4632, requires the Vermont Attorney General to issue an annual report about the disclosures.¹

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

As always, amendments to laws complicate the comparison of data from year to year. This report is the fifth 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

¹ The information that forms the basis of this report comes solely from the disclosures of prescribed product manufacturers. The recipients of the disclosed gifts, expenditures, and samples have not had the opportunity to review the disclosures or confirm their accuracy. Moreover, by publishing these disclosures, the Attorney General makes no representation as to their accuracy or the legality of the prescribed products or manufacturer’s underlying conduct.

disclosures to Vermont provide a less-than-full scope of the expenditure activity that took place in 2018, 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 2018 reveal that 168 manufacturers reported distributing 19,032 samples and spending approximately 5 million dollars² to Vermont health care providers, institutions and organizations. **Exhibit 1**. Only one manufacturer distributed 3,000 or more samples, and 77 manufacturers disclosed no sample activity at all. **Exhibit 1**.

The five manufacturers with the highest sample distribution during 2018 were: (1) GlaxoSmithKline, (2) Alcon Laboratories, (3) Pfizer, (4) Abbott Laboratories, and (5) Novo Nordisk. **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 61% in 2018 (compared with 55% in 2017 , 57% in 2016 , 54% in 2015, and 53% in 2014. **Exhibit 2**.

Recipients

The number of health care providers accepting at least 250 samples and the total number of samples accepted by them dropped dramatically in 2018. In RY 2018, 1 health care provider received 352 samples, a marked difference from 2017 when 33 health care providers received a total of 14,284 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**.

² As noted above, the ACA preempts Vermont from requiring disclosure of certain categories of expenditures and, as a result, this figure may not accurately reflect all Vermont expenditures. 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 approximately 71% of prescribed products sampled (compared with 72% in 2017, 69% in 2016, 56% in 2015, and 92% in 2014.). **Exhibit 4.**

The top 50 products by sample distribution were associated with the delivery of between 99 and 1,280 samples each. Of those products, 37 (74%) were pharmaceuticals, 6 (12%) were medical devices, 3 (6%) were infant formula, 2 (4%) were combination products, 1 (2%) was medical equipment/supplies and 1 (2%) was medical food. The 10 products sampled most frequently in 2018 accounted for 6,962 samples, or 37% of all samples distributed in 2018. **Exhibits 1 & 5.**

Analyzing the RY 2018 primary indications of the 50 products with the greatest number of samples, the three most prevalent indications were Chronic Obstructive Pulmonary Disease (COPD), Diabetes and asthma, which were associated with about 2,772, 2,206 and 1,767 samples respectively. **Exhibit 6.**

Samples

Of approximately 19,000 samples distributed in RY 2018 (**Exhibit 1**), more than 12,000 (63%) contained products, almost 4,000 (21%) contained vouchers or coupons for free or reduced-price products, and more than 3,500 (18%) contained other items, such as educational materials, non-prescribed items and cases/holders. 589 (3%) samples included two kinds of items (product, vouchers or other), and 300 (1.6%) 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, 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 2018, 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.

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 2018. 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 2018

Manufacturer	Number of Samples	Number of Expenditures	Expenditure Total
GlaxoSmithKline	4776	55	\$35,008.23
Alcon Laboratories, Inc.	2327	1	\$3,597.17
PFIZER INC.	1778	27	\$258,319.13
Abbott Laboratories	1734	659	\$22,872.00
Novo Nordisk Inc.	1046	1	\$32.27
Eli Lilly and Company	702	136	\$1,075,791.00
Sunovion	614		
Janssen Pharmaceuticals, Inc.	523	155	\$46,658.00
ASTRAZENECA	487	53	\$232,815.20
Astellas Pharma US, Inc.	452		
Oticon	366	23	\$2,442.24
Purdue Pharma L.P.	365		
Shire North American Group Inc	350	5	\$31,263.00
COLGATE ORAL PHARMACEUTICALS, INC.	317		
Merck Sharp & Dohme Corp	279		
Novartis Pharmaceuticals Corporation	263	24	\$57,062.91
LifeScan	256	5	\$64,475.74
sanofi-aventis U.S.	190	12	\$16,404.65
Lundbeck LLC	177	33	\$190.00
Johnson & Johnson Vision Care	165	3	\$2,262.00
AbbVie	138	25	\$102,103.00
Galderma Laboratories, L.P.	119	60	\$76,059.58
Otsuka America Pharmaceutical, Inc.	114		
Medline Industries Inc.	103	109	\$29,247.89
Boehringer Ingelheim Pharmaceuticals, Inc.	92		
Bausch Health Americas, Inc.	89	6	\$2,557.00
3M Company	84	47	\$3,242.12
Amgen Inc.	66	22	\$63,162.88
Cardinal Health, Inc.	66		
Ortho Clinical Diagnostics	55	1	\$3,984.90
CooperVision	54		
Impax Laboratories, Inc.	51	30	\$4,804.00
Medtronic plc	46	40	\$7,861.05

Exhibit 1 - Samples and Expenditures by Manufacturer 2018

MSD CORP	46		
Takeda Pharmaceuticals U.S.A., Inc.	45	34	\$22,477.11
Alkermes, Inc.	44	3	\$484.26
Aerie Pharmaceuticals Inc.	43		
Boston Scientific Corporation	43	14	\$12,381.90
Regeneron Pharmaceuticals, Inc.	43		
Mylan Pharmaceuticals Inc.	40	18	\$2,176.53
LEO Pharma	39		
MISSION PHARMACAL COMPANY	39		
ConvaTec	37	2	\$7.05
Genzyme Corporation	37	29	\$33,554.47
Peter Brasseler Holdings, LLC	24		
MSD Oss B.V. a subsidiary of Merck & Co. Inc	20		
Genentech, Inc.	19	12	\$198,821.56
Neurocrine Biosciences, Inc.	19		
Iroko Pharmaceuticals, LLC	18		
Becton Dickinson	17	3	\$5,452.76
Medac Pharma, Inc	17		
Radius Health	16	3	\$18.71
ASCEND Therapeutics US, LLC	15	78	\$43.78
Bayer HealthCare LLC	15		
Avanir Pharmaceuticals, Inc.	14	2	\$3,947.58
Gilead Sciences, Inc.	14	5	\$27,759.14
Noven Pharmaceuticals, Inc.	14		
Merz North America	12	15	\$359.00
B. Braun Medical	8	1	\$3.19
Janssen Biotech, Inc.	8	7	\$31,038.00
CELGENE CORPORATION	7		
Sonova USA	7	9	\$123,436.00
Terumo Medical	7		
ACADIA Pharmaceuticals Inc	6		
Dr. Reddy's Laboratories	6	1	\$10.00
Concordia Pharmaceuticals Inc.	4		
Ferring Pharmaceuticals Inc.	4	1	\$1.00

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Baxter Healthcare Corporation	3	5	\$86,046.53
Flexion Therapeutics	3		
Hollister Incorporated	3		
AMAG Pharmaceuticals	2	1	\$11.00
ARBOR PHARMACEUTICALS, INC.	2	14	\$164.44
Aries Pharmaceuticals, Inc.	2		
Coloplast Corp.	2		
Insulet Corporation	2		
Ipsen Biopharmaceuticals	2	4	\$2,539.85
Mayne Pharma Inc.	2		
Merit Medical Systems, Inc.	2		
Mylan Specialty L.P.	2		
Ossur Americas,	2		
UCB, Inc.	2		
ACE Surgical Supply Co.	1		
Antares Pharma	1		
ARKRAY USA	1		
CONMED Corporation	1		
Cook Medical Inc.	1	1	\$6,158.26
DENTSPLY SIRONA	1	2	\$131.56
Fresenius Medical Care NA	1		
Pernix Therapeutics Holdings, Inc.	1		
Shionogi Inc	1	2	\$20.58
VANDA PHARMACEUTICALS INC	1		
Acclarent		2	\$3,706.00
Acorda Therapeutics, Inc		6	\$52,598.00
Adamas Pharmaceuticals, Inc.		1	\$10.00
Alnylam Pharmaceuticals		6	\$25,622.75
Applied Medical Resources Corporation		1	\$1,025.00
Aptevo Therapeutics		1	\$24.45
Array BioPharma Inc.		2	\$1,800.00
Bayer HealthCare Pharmaceuticals Inc.		3	\$137,904.84
Biogen, Inc.		50	\$1,348,911.14
Bio-Rad Laboratories, Inc.		25	\$7,405.60

Exhibit 1 - Samples and Expenditures by Manufacturer 2018

Biosense Webster, Inc.		16	\$78,983.00
Bioventus LLC		1	\$46.90
Brainlab		1	
C.R. Bard Subsidiaries		5	\$4,774.00
Celgene Corporation		1	\$10.51
Change Healthcare Technologies, LLC		19	\$6,521.25
Cochlear Americas		18	\$2,933.39
CooperSurgical		1	\$19.63
Corcept Therapeutics		2	\$16.55
CSL Behring		30	\$800.35
Daiichi Sankyo Inc.		16	\$11,308.00
DePuy Orthopaedics, Inc.		35	\$51,333.00
Draeger Medical Systems		2	\$2,000.00
Edwards Lifesciences Corporation		10	\$896.00
Egalet US Inc		51	\$44.58
Eisai Inc.		71	\$110,689.92
Ethicon		6	\$8,581.89
Ethicon US, LLC		28	\$49,856.00
Grifols USA		6	\$13,964.97
Henry Schein		12	\$59,845.68
Hill-Rom Holdings		7	\$5,727.61
Hu-Friedy Mfg. Co., LLC		7	\$205.00
Hydrocision, Inc.		3	\$929.87
Indivior Inc.		46	\$30,304.00
Integra LifeSciences Corporation		27	\$2,504.00
Janssen Research and Development		3	\$840.00
Janssen Therapeutics Division of Janssen Products		1	\$3,115.00
Jazz Pharmaceuticals Inc.		1	\$63.91
Johnson & Johnson Surgical Vision		3	\$1,406.00
KARLSTORZ Endoscopy-America		62	\$4,600.00
KCI USA, Inc		3	\$309.00
Keryx Biopharmaceuticals, Inc.		1	\$14.55
LEICA MICROSYSTEMS INC.		1	\$33.00

Exhibit 1 - Samples and Expenditures by Manufacturer 2018

LeMaitre Vascular		1	\$1,000.00
LivaNova USA, Inc.		8	\$1,397.00
Loxo Oncology, Inc.		1	\$3,729.60
McKesson Medical-Surgical		2	\$487.66
Medicines360		5	\$0.00
Mentor Worldwide		1	\$883.00
MicroPort Orthopedics		1	\$123.08
Millennium Pharmaceuticals, Inc.		3	\$60,699.49
Mitsubishi Tanabe Pharma America		1	\$1,500.00
Molnlycke Health Care US, LLC		9	\$2,451.83
Mylan Institutional Inc.		1	\$6.49
Myriad Genetic Laboratories		1	\$1,156.00
Olympus Corporation of the Americas		17	\$1,000.00
Optinose US, Inc.		109	\$64,210.12
OSTEOMED LLC		10	\$859.00
Pharmacyclics LLC, An AbbVie Company		1	\$1,000.00
Philips Electronics North America Corporation		40	\$22,176.38
Puma Biotechnology		2	\$2,000.00
Regeneron Healthcare Solutions, Inc.		4	\$1,825.52
Retrophin Inc		3	\$13.73
Sanofi Pasteur Inc.		17	\$15,897.30
Sarepta Therapeutics		1	\$24.33
Seqirus		3	\$170.51
Simmons		1	\$150.00
Smith & Nephew, Inc.		45	\$12,325.40
Straumann Manufacturing		4	\$4,325.68
Stryker Corporation		161	\$93,066.00
Sunovion Pharmaceuticals Inc		9	\$1,020.31
TOLMAR Pharmaceuticals, Inc.		4	\$119.05
United Therapeutics Corporation		1	\$5,061.00
Upsher-Smith Laboratories		1	\$2,468.89
Vertex Pharmaceuticals Incorporated		7	\$2,303.39
ViiV Healthcare Company		2	\$1,569.31
VIVUS		4	\$1,737.43

Exhibit 1 - Samples and Expenditures by Manufacturer 2018

Total

19,032

2,871

\$5,037,703.05

Exhibit 2: Top Five Manufacturers with Most Samples, 2014-2018

Rank by Number of Samples	2014	2015	2016	2017	2018
1	Pfizer	GlaxoSmithKline	GlaxoSmithKline	Pfizer	GlaxoSmithKline
2	GlaxoSmithKline	Abbott Laboratories	Abbott Laboratories	GlaxoSmithKline, LLC	Alcon Laboratories, Inc.
3	AstraZeneca	Pfizer	Allergan	Abbott Laboratories	Pfizer
4	Forest Laboratories	Alcon Laboratories	Pfizer	Allergan	Abbott Laboratories
5	Eli Lilly and Company	Astrazeneca	Alcon Laboratories	Alcon Laboratories	Novo Nordisk
Number of Samples for Top 5 Manufacturers	23,914	29,356	26,229	36,008	11,661
Percentage of Overall Sample Total Attributable to Top 5 Manufacturers	53%	54%	57%	55%	61.27%

Exhibit 4: Samples and Expenditures by Product Type, 2018

Product Type	Number of Samples	Percent Number of Samples	Number of Expenditures	Percent Number of Expenditures	Expenditure Total*	Percent Expenditure Total
Pharmaceuticals	15,812	71.35%	1,475	40.73%	\$4,293,798.01	52.46%
Medical Devices	2,912	13.14%	1,878	51.86%	\$1,264,632.94	15.45%
Infant Formula	1,820	8.21%				
Medical Food	543	2.45%				
Medical Equipment/Supplies	496	2.24%				
Combination Product	391	1.76%	11	0.30%	\$19,180.80	0.23%
Biologics	186	0.84%	252	6.96%	\$2,574,253.42	31.45%
Other			5	0.14%	\$33,623.00	0.41%
Totals	22,160		3,621		\$8,185,488.17	

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, 2018

Rank	Product Name	Manufacturer	Product Type	Primary Indication	Number of Samples
1	Breo	GlaxoSmithKline	Pharmaceuticals	Chronic Obstructive Pulmonary Disease (COPD)	1280
2	Advair	GlaxoSmithKline	Pharmaceuticals	Asthma	1239
3	O-F PM 20Z Starter Kit - US	Alcon Laboratories	Medical Devices	Eye Care	625
4	Anoro	GlaxoSmithKline	Pharmaceuticals	Chronic Obstructive Pulmonary Disease (COPD)	613
5	Xarelto	Janssen Pharmaceuticals	Pharmaceuticals	Deep Vein Thrombosis	595
6	Latuda	Sunovion	Pharmaceuticals	Schizophrenia	594
7	Syatane Ultra	Alcon Laboratories	Pharmaceuticals	Dry Eyes	553
8	PediaSure 8oz btl Ped Kit	Abbott Laboratories	Medical Food	Nutrition	504
9	Eliquis	Pfizer	Pharmaceuticals	Stroke	491
10	Clearcare w/Hydraglyde	Alcon Laboratories	Medical Devices	Eye Care	468
11	Hearing Aid Accessory	Oticon	Medical Equipment/Supplies	Hard of Hearing	366
12	Trelegy	GlaxoSmithKline	Pharmaceuticals	Chronic Obstructive Pulmonary Disease (COPD)	363
13	Systane Balance	Alcon Laboratories	Pharmaceuticals	Dry Eyes	344
14	Flovent	GlaxoSmithKline	Pharmaceuticals	Asthma	340
15	Victoza	Novo Nordisk	Pharmaceuticals	Diabetes	322
16	Lyrica	Pfizer	Pharmaceuticals	Neuropathic Pain Associated with Diabetic Peripheral Neuropathy	309
17	Ellipta	GlaxoSmithKline	Pharmaceuticals	Chronic Obstructive Pulmonary Disease (COPD)	308
18	Oxycontin	Purdue Pharma	Pharmaceuticals	Pain	304
19	Similac Pro-Advance HMO 8 Ounce Powder Pediatric Kit	Abbott Laboratories	Infant Formula	Infant Formula	293
20	Systane Complete	Alcon Laboratories	Pharmaceuticals	Dry Eyes	282
21	Tresiba	Novo Nordisk	Pharmaceuticals	Diabetes	279
22	Viagra	Pfizer	Pharmaceuticals	Erectile Dysfunction	277
23	Similac Alientum	Abbott Laboratories	Infant Formula	Infant Formula	257
24	Taltz	Eli Lilly	Pharmaceuticals	Plaque Psoriasis	257
25	Colgate Sensitive	Colgate Oral Pharmaceuticals	Pharmaceuticals	Dental Care	251
26	NovoLog	Novo Nordisk	Pharmaceuticals	Diabetes	221
27	Rexulti	Lundbeck/Otsuka America Pharmaceutical	Pharmaceuticals	Major Depressive Disorder	322

Exhibit 5: Top Products - 50 Products with Greatest Number of Samples, 2018

Rank	Product Name	Manufacturer	Product Type	Primary Indication	Number of Samples
28	Similac Pro-Sensitive HMO Powder	Abbott Laboratories	Infant Formula	Infant Formula	220
29	Incruse	GlaxoSmithKline	Pharmaceuticals	Chronic Obstructive Pulmonary Disease (COPD)	209
30	Arnuity	GlaxoSmithKline	Pharmaceuticals	Asthma	188
31	Levitra	GlaxoSmithKline	Pharmaceuticals	Erectile Dysfunction	180
32	Myrbetriq	Astellas Pharma US	Pharmaceuticals	Overactive Bladder	344
33	Invokana	Janssen Pharmaceuticals	Pharmaceuticals	Diabetes	175
34	OneTouch Verio Test Strips	LifeScan	Medical Devices	Diabetes	166
35	Nexium	Pfizer	Pharmaceuticals	Gastroesophageal Reflux Disease (GERD)	166
36	Trintellix	Lundbeck	Pharmaceuticals	Major Depressive Disorder	159
37	Mydayis	Shire North American Group	Pharmaceuticals	Attention Deficit Hyperactivity Disorder (ADHD)	158
38	Humalog	Eli Lilly	Combination Product	Diabetes	259
39	Farxiga (Dapagliflozin)	Astrazeneca	Pharmaceuticals	Diabetes	148
40	Blink	Johnson & Johnson Vision Care	Medical Devices	Eye Care	141
41	OneTouch Lancets	LifeScan	Medical Devices	Diabetes	134
42	Ozempic	Novo Nordisk	Pharmaceuticals	Diabetes	131
43	Durezol	Novartis Pharmaceutical	Pharmaceuticals	Inflammation and Pain Associated with Ocular Surgery	130
44	Trulicity	Eli Lilly	Combination Product	Diabetes	130
45	Pazeo	Novartis Pharmaceutical	Pharmaceuticals	Ocular Itching associated with Allergic Conjunctivitis.	122
46	OneTouch Verio Flex Blood Glucose Meter	LifeScan	Medical Devices	Diabetes	121
47	Simbrinza	Novartis Pharmaceutical	Pharmaceuticals	Glaucoma	120
48	Jardiance	Boehringer Ingelheim Pharmaceuticals	Pharmaceuticals	Diabetes	120
49	Travatan	Novartis Pharmaceutical Corporation	Pharmaceuticals	Glaucoma	109
50	Xiidra	Shire North American Group Inc	Pharmaceuticals	Dry Eyes	99

Exhibit 6: Samples by Primary Indication of the top 50 Products with the Greatest Number of Samples, 2014-2018

Primary Indication	2014		2015		2016		2017		2018	
	# of Samples	Rank	# of Samples	Rank	# of Samples	Rank	# of Samples	Rank	# of Samples	Rank
Gout	1,127	13	471	17						
Hyperlipidemia	2,099	5	1,050	7						
Hypothyroidism										
Infant Care			292	23						
Migraine Headaches										
Myocardial Infarction Preventative										
Nonvalvular Atrial Fibrillation	351	25								
Osteoarthritis	1,503	7	436	18						
Leukemia										
Primary Hypogonadism										
Reversible Obstructive Airway Disease ²	333	27								
Smoking Cessation	477	23	256	25						
Various: Multiple Products	1,336	9								
Totals:									14,092	

Exhibit 7: Contents of Sample by Category, 2014-2018

2014		2015		2016		2017		2018	
Product		Product		Product		Product		Product	
Product Only	28,786	Product Only	29,607	Product Only	25,990	Product Only	41,567	Product Only	11,897
Product and Vouchers	994	Product and Vouchers	703	Product and Vouchers	1,984	Product and Vouchers	636	Product and Vouchers	307
Product and Other	786	Product and Other	720	Product and Other	734	Product and Other	990	Product and Other	170
Product, Vouchers and Other	17	Product, Vouchers and Other	4,216	Product, Vouchers, and Other	829	Product, Vouchers, and Other	992	Product, Vouchers and Other	300
Total	30,583	Total	35,246	Total	29,537	Total	44,185	Total	12,674
Vouchers		Vouchers		Vouchers		Vouchers		Vouchers	
Vouchers Only	12,858	Vouchers Only	9,804	Vouchers Only	10,043	Vouchers Only	14,859	Vouchers Only	3,227
Vouchers and Product	994	Vouchers and Product	703	Vouchers and Product	1,984	Vouchers and Product	636	Vouchers and Product	307
Vouchers and Other	243	Vouchers and Other	873	Vouchers and Other	419	Vouchers and Other	74	Vouchers and Other	112
Vouchers, Product and Other	17	Vouchers, Product and Other	4,216	Vouchers, Product, and Other	829	Vouchers, Product, and Other	992	Vouchers, Product and Other	300
Total	14,112	Total	15,596	Total	13,275	Total	16,561	Total	3,946
Other		Other		Other		Other		Other	
Other Only	1,865	Other Only	7,821	Other Only	5,961	Other Only	6,416	Other Only	3,019
Other and Vouchers	243	Other and Vouchers	873	Other and Vouchers	419	Other and Vouchers	74	Other and Vouchers	112
Other and Product	786	Other and Product	720	Other and Product	734	Other and Product	990	Other and Product	170
Product, Vouchers and Other	17	Product, Vouchers and Other	4,216	Other, Vouchers, and Product	829	Other, Vouchers, and Product	992	Product, Vouchers and Other	300
Total	2,911	Total	13,630	Total	7,943	Total	8,472	Total	3,601