

Allegation: Direction To Management Re Measuring Sales

Massachusetts AG FAC ¶226:

226. The Sacklers also knew and intended that the sales reps would push higher doses of Purdue's opioids. That same month, **Richard Sackler directed Purdue management to "measure our performance by Rx's by strength, giving higher measures to higher strengths."**

He copied Jonathan and Mortimer Sackler on the instruction. The Sacklers knew higher doses put patients at higher risk. As far back as the 1990s, Jonathan and Kathe Sackler knew that patients frequently suffer harm when "high doses of an opioid are used for long periods of time."

ed that two sales reps hired in the 2008 expansion
ptions in Massachusetts that they were among
warded them with bonuses and all-expense-paid trips
es to motivate other reps to sell more opioids.¹²⁷
intended that the sales reps would push higher doses
Richard Sackler directed Purdue management to
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on the instruction. The Sacklers knew higher doses
he 1990s, Jonathan and Kathe Sackler knew that
doses of an opioid are used for long periods of

Sacklers voted to pay former CEO and criminal convict
me of several multi-million-dollar payments to the
ity and protect the Sackler family.
ing on a crash-proof reformulation of OxyContin to
Sacklers learned that another company was planning
of opioids are safer for patients.¹²⁹ Mortimer Sackler
es to find out whether reformulated OxyContin was
patients. He wrote to Richard Sackler: "Purdue should
ch and should be generating the research to support

¹²⁷ 2018-02-18 deposition of Catherine Yates Sydek pg. 120; 2018-03-01 deposition of Timothy Quinn pg. 99.

¹²⁸ 2008-02-11 email from Richard Sackler, PPLPC012000170948-949.

¹²⁹ 1997-01-12 memo from John Stewart, PPLPC01701785443.

¹³⁰ 2008-02-14 Board minutes, PKY183212622.

¹³¹ 2007-10-26 Sales & Marketing presentation, pg. 2, PPLPC012000159022.

¹³² 2008-02-07 email from Robert Kiehn, PPLPC013000244844.

Irrelevant 2008 Email Suggests Sales Performance Metric

February 13, 2008 email from Richard to J. Stewart and others

Let's **measure our performance** by Rx's by strength, giving higher measures to higher strengths an especially the new strengths.

- **OIG confirmed compliance for 2008**

From: Giedla, Russell
Sent: Thu 2/14/2008 8:07:32 AM
Subject: RE: OxyContin trade inventory stoichiometry.xls

Ed

Trade inventory does take into account the new strengths and OTR. Kim has that factored into the calculations.

Also, others may want to weigh in on valuing the higher strengths versus lower strengths. With the top bonus plan we have been very careful to not over incentivize reps to promote the higher strengths over the lower strengths. Also strengths are important to the overall success of the brand. Also, I would think that the further people are from impacting the demand, the less of an incentive plan this becomes...I do not think generating appropriate demand is my department's responsibility.

2/13/2008 8:33 PM

g, David

Inventory stoichiometry.xls

factory sales is interesting. Russ and I will get the data

2/13/2008 7:00 PM

From: Sackler, Dr. Richard
Sent: Wednesday, February 13, 2008 7:29 PM
To: Stewart, John H. (US); Mahony, Edward; Long, David; Pearl Meyer; Joseph A. Sorrentino; Mortimer, Jik
Subject: OxyContin trade inventory stoichiometry.xls

<< File: OxyContin trade inventory stoichiometry.xls >>

This spreadsheet demonstrates the enormous difficulty in forecasting 2008 shipments only allowing for inventory shifts in the trade.
We haven't layered on this the impact of the new strengths and OTR.

General performance measure for 2008 --

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PPLPC012000170948

2/13/08 Email from R. Sackler (PPLPC012000170948)