

# Allegation: Knowledge Of Opioid Risks

## 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."

225. Purdue managers determined that two sales reps hired in the 2008 expansion

prescriptions in Massachusetts that they were among  
any rewarded them with bonuses and all-expense-paid trips  
examples to motivate other reps to sell more opioids.<sup>117</sup>

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th, Richard Sackler directed Purdue management to  
y strength, giving higher measures to higher strengths."<sup>118</sup>

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k as the 1990s, Jonathan and Kathe Sackler knew that  
"high doses of an opioid are used for long periods of

he Sacklers voted to pay former CEO and criminal convict  
was one of several multi-million-dollar payments to the  
r loyalty and protect the Sackler family.

working on a crush-proof reformulation of OxyContin to

The Sacklers learned that another company was planning  
a-proof opioids are safer for patients.<sup>119</sup> Mortimer Sackler  
r studies to find out whether reformulated OxyContin was  
as of patients. He wrote to Richard Sackler: "Purdue should

be lending the charge on this type of research and should be generating the research to support

<sup>117</sup> 2018-02-18 deposition of Catherine Yates Sytek pg. 120; 2018-03-01 deposition of Timothy Quinn pg. 99.

<sup>118</sup> 2008-02-13 email from Richard Sackler, PPLPC012000170948-9-99.

<sup>119</sup> 1997-03-12 memo from John Stewart, PDD1701785443.

<sup>120</sup> 2008-02-14 Board minutes, PKY183212622.

<sup>121</sup> 2007-10-26 Sales & Marketing presentation, pg. 2, PPLPC012000159022.

<sup>122</sup> 2008-02-07 email from Robert Kaiko, PPLPC013000244844.

# Irrelevant 1997 Memo Discusses Need For Alternate Opioid Analgesics

**To:** Jonathan D. Sackler  
**From:** John H. Stewart  
**Date:** March 12, 1997

## 1. Therapeutic Need for More than One Opioid

### Emergency of Side Effects – Especially at High Doses

- When high doses of an opioid are used for long periods of time, adverse effects such as nausea, vomiting, delirium and myoclonus frequently become dose limiting. In such situation, significant clinical improvement can often be obtained by transferring the patient to an alternate opioid – as noted in the attached reprint by de Stoutz and Bruera.

