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February 1, 2021

#### VIA EMAIL

The Honorable Carolyn B. Maloney Chairwoman Committee on Oversight and Reform Congress of the United States House of Representatives 2157 Rayburn House Office Building Washington, D.C. 20515-6143

Dear Chairwoman Maloney:

We write on behalf of our client David Sackler in response to your Question for the Record ("QFR"), dated January 11, 2021, which was addressed to Mr. Sackler in connection with the testimony he provided at the December 17, 2020 hearing, titled "The Role of Purdue Pharma and the Sackler Family in the Opioid Epidemic."

The QFR included the following question:

1. At the hearing, I asked about your family's withdrawal of more than \$10 billion from Purdue Pharma from 2008 through 2018 to or for the benefit of Sackler family trusts and foreign-based companies, including how much of your family's wealth is in foreign bank accounts and shell companies. You declined to answer my question, testifying, "that's really a question for the lawyers."

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JUNIEN ROSENBERG
JUSTIN ROS

\*NOT ADMITTED TO THE NEW YORK BAR \*ADMITTED ONLY TO THE CALIFORNIA BAR For each of the Sackler family members named in the Bankruptcy proceedings<sup>1</sup>, please provide the Committee:

- a. An accounting of the assets held by each named Sackler, including: where the assets are held; in what format they are held (trust, corporation, partnership, etc.); why the format was selected (i.e. tax, other reason, etc.); and a general understanding of the type of such assets; and
- b. The value of each of the assets identified in (a), including the approximate aggregate value of the assets owned by category (e.g., cash, securities, real estate, private and other investments, etc.) and approximate liabilities, also by category.

\* \* \*

The information below concerns David and Richard Sackler, and the estates of Beverly Sackler and Jonathan Sackler, who are part of the Raymond Sackler side of the Sackler family (known as "Side B"). David, Richard, Beverly and Jonathan Sackler were formerly directors of Purdue Pharma and are referred to herein as the "Side B Former Directors." We understand that members of the Mortimer D. Sackler side of the family (known as "Side A"), are providing answers to you under separate cover.

As a threshold matter, we respectfully disagree with any suggestion that any of the Side B Former Directors have sought to shield assets from creditors, whether through the creation of trusts, investments in foreign companies or in any other manner. As discussed below, most of the trusts of which they are beneficiaries were established well before 2008, and for ordinary estate planning purposes.

As detailed in the report prepared by AlixPartners in connection with the Purdue bankruptcy, dated December 16, 2019 (attached as Exhibit A), cash distributions generally flowed up from Purdue Pharma L.P. to Pharmaceutical Research Associates L.P., and (1) were invested in certain foreign independent associated companies (commonly referred to as "IACs," which are mostly pharmaceutical and healthcare companies that operate outside of the United States) that are principally owned by trusts for the benefit of the Sackler family; (2) continued to flow up through other holding companies to trusts established for the benefit of the Sackler family; or (3) were distributed for payments to tax authorities. From 2008 to 2017, such distributions to Side A and Side B of the Sackler family totaled approximately \$10.3 billion in aggregate. Of that \$10.3 billion aggregate amount, approximately \$4.7 billion was distributed for the

<sup>&</sup>lt;sup>1</sup> Including the estate of Beverly Sackler, David A. Sackler, Ilene Sackler, Jonathan D. Sackler, Kathe Sackler, Mortimer D.A. Sackler, Richard S. Sackler, Theresa Sackler, any trusts of which any of the foregoing are beneficiaries, and the trustees thereof.

<sup>&</sup>lt;sup>2</sup> Formerly Purdue Holdings L.P.

purposes of tax payments, and approximately \$1.5 billion was invested into IACs that are jointly owned by Side A and Side B.<sup>3</sup> The remaining distributions, which totaled approximately \$4.1 billion, ultimately flowed to separate trusts for the benefit of Side A and Side B of the Sackler family, respectively (i.e., approximately \$2 billion was ultimately distributed to trusts for the benefit of Side B). A substantial amount of additional, more granular data about these distributions, including breakdowns by year and information about the entities and tax authorities that received such transfers, can be found in the AlixPartners report.

#### A. Side B Trust Structures

With regard to Side B of the Sackler family, there are four categories of trusts of which some or all of the Side B Former Directors—in many instances, along with their issue and others—are beneficiaries during their lifetimes:<sup>4</sup> (1) five trusts that indirectly own interests in Purdue; (2) six trusts created by division of one trust in category 1, or by division or decanting from such trusts; (3) 11 other trusts that directly and/or indirectly own interests in various entities owned jointly by both Side A and Side B of the Sackler family (sometimes referred to as "II-way entities"); and (4) 26 additional trusts, including trusts holding real estate and life insurance, and pourover trusts.

Most of these trusts were created well before 2008 for ordinary estate planning reasons, including intergenerational planning, managing the passing of wealth to succeeding generations, and tax efficiency. All of the B-side trusts that indirectly own interests in Purdue are irrevocable, non-grantor, discretionary spendthrift trusts, with the oldest of such trusts being created in 1974 and the most recent in the early 2000s. In addition, many of the other trusts described in categories (1) through (4) are irrevocable, non-grantor, discretionary spendthrift trusts. All trusts described in categories (1) through (4) are administered in U.S. states and are governed by the laws of U.S. states.

The Side B trusts to which distributions from Purdue have flowed hold primarily the following categories of assets: cash and cash equivalents in U.S. accounts; accounts receivable (e.g., tax refunds); notes receivable and loans; U.S. and non-U.S. pharmaceutical and health assets (typically, entities that directly or indirectly own Purdue, and II-way entities (or entities that directly or indirectly own II-way entities)); marketable securities; hedge fund and private equity investments; real estate investments; life insurance; and other investments.

Tax distributions arose because Purdue Pharma L.P. is a partnership for U.S. federal income tax purposes. Therefore, Purdue "passes through" its profits to its owners.

<sup>&</sup>lt;sup>4</sup> Upon their deaths, Beverly Sackler and Jonathan Sackler (and their respective estates) ceased to be beneficiaries of any of these trusts.

#### **B.** Assets of Side B Former Directors

With the following exceptions, all assets of the Side B Former Directors are held in the United States: (i) certain Side B Former Directors hold various direct and indirect investments in certain II-way entities and (ii) the Side B Former Directors estimate that they hold a small portion (i.e., approximately 8%) of their collective assets in non-U.S. investment vehicles managed by third parties.<sup>5</sup> No Side B Former Director is the holder of any foreign bank account.<sup>6</sup>

A breakdown of the categories of the assets and liabilities for each Side B Former Director is below.

**Richard S. Sackler**: Assets include cash and cash equivalents in U.S. bank accounts; investments in U.S. brokerage accounts; accounts receivable; notes receivable and loans; direct and indirect investments in II-way entities; marketable securities; hedge fund and private equity investments; real estate investments; residential real estate; life insurance; retirement accounts; and artwork and other personal property. Liabilities include accounts payable and long-term debt.

**Estate of Beverly Sackler:** Assets include cash and cash equivalents in U.S. bank accounts; accounts receivable; marketable securities; hedge fund and private equity investments; residential real estate; and artwork and other personal property.

Estate of Jonathan D. Sackler: Assets include cash and cash equivalents in U.S. bank accounts; investments in U.S. brokerage accounts; accounts

The Side B Former Directors' income from these investment vehicles is reported and taxed on a current basis in the U.S. Also, values change on a month-to-month basis based on investment performance.

In addition, please note that the QFR mischaracterizes David Sackler's response to the question, asked at the hearing: "How much of your family's wealth is currently in foreign bank accounts?" As page 23 of the hearing transcript reflects, Mr. Sackler answered: "Of our family's wealth? I don't believe—very small amount if any." Gregory Joseph's December 18, 2020 letter to Chairwoman Maloney (attached as Exhibit B) further clarified that Mr. Sackler's reference to "our family" in that response was to the Raymond Sackler family.

For purposes of this letter and the term "Side B Former Directors," the "Estate of Beverly Sackler" collectively refers to Mrs. Sackler's estate and a revocable trust she created during her lifetime as part of typical estate planning.

For purposes of this letter and the term "Side B Former Directors," the "Estate of Jonathan D. Sackler" collectively refers to Mr. Sackler's estate and a revocable trust he created during his lifetime as part of typical estate planning.

receivable; notes receivable and loans; direct and indirect investments in II-way entities; marketable securities; private equity investments; real estate investments; and artwork. Liabilities include long-term debt.

**David A. Sackler:** Assets include cash and cash equivalents; accounts receivable and prepaid expenses; notes receivable; private equity investments; and artwork and other personal property. Liabilities comprise long-term debt and short-term debt.

As of September 30, 2020, the total net assets of the Side B Former Directors were collectively reported at approximately \$700 million.

\* \*

Should you have additional questions, please do not hesitate to contact us.

Very truly yours,

/s/ Roberto Finzi

Roberto Finzi

### Exhibit A

### **Alix**Partners

## **Cash Transfers of Value Analysis**

December 16, 2019

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### **Alix**Partners

I. Objectives of the Transfers of Value Analysis

### **Objectives of the Transfers of Value Analysis**

At the direction of the Special Committee of the Board of Directors of Purdue Pharma Inc. (the "Special Committee") and Davis Polk & Wardwell LLP ("Counsel"), AlixPartners, LLP ("AlixPartners") has performed a comprehensive transfers of value analysis.

- This report (the "Cash Transfers of Value Report") sets forth the results of AlixPartners's cash transfers of value analysis (the "Cash Transfers of Value Analysis"), based on the identification and quantification of transfers of value on or after January 1, 2008 made as cash distributions, compensation, legal expenses and benefits provided to or for the benefit of the Sackler Family members, as explained in greater detail on the following page.
- The analysis of intercompany and non-cash transfers of value made on or after January 1, 2008 will be addressed in a separate report (the "Intercompany and Non-Cash Transfers Report"). That report will set forth the results of the identification and quantification of transfers of value made as (1) non-cash transfers from Purdue to its parent, Pharmaceutical Research Associates, L.P. ("PRA L.P."); and (2) cash payments for goods, services and other consideration, including with respect to intellectual property, among Purdue and independent associated entities ("IACs"), Rhodes and IACs, and Purdue and Rhodes.<sup>1</sup>

### Objectives of the Cash Transfers of Value Analysis

The objectives of the Cash Transfers of Value Analysis were to:

Identify and quantify all transfers of value from the following entities and their respective subsidiaries, to parent entities, shareholders and/or family members and/or any other entity in which beneficial owners or families own a controlling interest (collectively "Affiliated Entities", including IACs):

- Purdue Pharma L.P. ("PPLP") together with its subsidiaries (collectively "Purdue");
- Purdue Pharma, Inc. ("PPI"), which is the general partner of Purdue; and
- Coventry Technologies L.P., Rhodes Associates L.P., Rhodes Technologies Inc., Rhodes Technologies, Rhodes Pharmaceuticals Inc. and Rhodes Pharmaceuticals L.P. (collectively "Rhodes").

This analysis included identifying and quantifying the following transfers of value by Purdue, PPI and Rhodes on or after January 1, 2008 through September 30, 2019, to the extent such transfers were made:

- Cash distributions to or for the benefit of Affiliated Entities ("Cash Distributions");
- Compensation paid to or for the benefit of the Sackler Family members;
- Legal expenses incurred on behalf of the Sackler Family members;
- Pension benefits ("Pension Benefits") paid to the Sackler Family members;
- Travel and expense ("T&E") reimbursements paid to or for the benefit of the Sackler Family; and
- Fringe benefits ("Fringe Benefits") provided to the Sackler Family members.

The findings and results of our analysis are set forth in this Cash Transfers of Value Report.

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## II. Sources Relied Upon

### **Sources Relied Upon**

In order to achieve the objectives of the Cash Transfers of Value Analysis, we accessed and reviewed various sources of information from Purdue, PPI, Rhodes, TXP Services, Inc. ("TXP") and One Stamford Realty L.P. ("One Stamford Realty") that we used and relied on when performing our analysis. Refer to Appendix A for a more detailed listing of these sources.

- 1. Entity organizational charts
- 2. SAP accounting system information
- 3. Purdue's and Rhodes's internally-prepared distribution reports
- Audited financial statements<sup>1</sup>
- 5. Internal financial statements, reports, schedules and/or SAP accounting records for PPLP, Rhodes, PPI, PLP Associates Holdings Inc. and other Affiliated Entities whose books and records are maintained in the same SAP accounting system
- 6. Accounting and approval documentation for Cash Distributions made by Purdue and Rhodes, and dividends paid by PPI and PLP Associates Holdings Inc.
- 7. State Complaints as set forth in Exhibit G
- 8. Payroll and compensation records
- 9. Purdue's legal expense reports prepared by Purdue's Legal Department
- 10. Pension Benefit records and related documentation
- 11. Purdue's T&E reports, accounts payable T&E reimbursement payments and T&E supporting documentation
- 12. Fringe Benefit records
- 13. Purdue, PPI, Rhodes, TXP and One Stamford Realty employees
  - TXP provides accounting and other administrative services to Purdue and PPI. One Stamford Realty owns the building in which Purdue's corporate headquarters are located. Employees of these entities assist with the management of the Fringe Benefit programs provided to the Sackler Family members.

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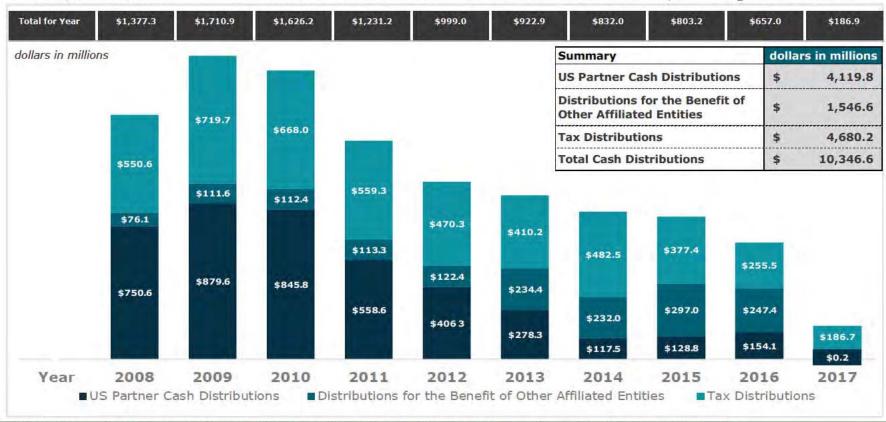
### **III. Executive Summary**

### **Executive Summary - Purdue/Rhodes Cash Distributions Analysis**

Total Net Cash Distributions paid by Purdue and Rhodes to or for the benefit of the Affiliated Entities and/or taxing authorities on or after January 1, 2008 were \$10.4 billion.

- Cash Distributions generally flowed up from Purdue or Rhodes according to their ownership interests and then to the ultimate recipient entity. For example, Purdue's Cash Distributions generally flowed up from Purdue to and through PRA L.P. (which was formerly Purdue Holdings L.P.), and were either invested in IACs, or continued to flow up through other holding companies to trusts established for the benefit of the Sackler Family members or to taxing authorities.

Purdue/Rhodes Total Net Cash Distributions to or for the Benefit of Affiliated Entities and/or Taxing Authorities 1,2,3,4



<sup>&</sup>lt;sup>1</sup>The classification of US Partner Cash Distributions, Distributions for the Benefit of Other Affiliated Entities and Tax Distributions is based on Purdue's Internal Distributions Analysis and the October 19, 2018 MDL Presentation (as later defined).



<sup>2</sup> Distributions for the Benefit of Other Affiliated Entities correspond with the Ex-US Cash Distributions category in Purdue's Internal Distributions Analysis.

<sup>3 2017</sup> Cash Distributions do not include \$312 6 million of loans to PRA L P., all of which have since been repaid in full with interest. Rhodes paid \$70,000 in Tax Distributions in 2018 which are not included in the chart above. Cash Distributions were not paid from January 1, 2019 through September 30, 2019.

## Executive Summary – Compensation to the Sackler Family Members

Purdue paid approximately \$371,400 in payroll compensation to or for the benefit of the Sackler Family members on or after January 1, 2008. Refer to Appendix B for the Sackler Family member names, titles and relationships.

Sackler Family Member	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	YTD September 30, 2019	Total January 1, 2008 through September 30, 2019
Kathe A. Sackler <sup>2</sup>	\$ 2,100	\$ 2,100	\$ 8,980	\$ 11,749	\$ 11,644	\$ 4,500	\$ 4,500	\$ 4,995	\$ 5,719	\$ 5,720	\$ 6,500	\$ -	\$ 68,507
Mortimer D.A. Sackler	2,100	2,100	2,400	2,600	2,800	3,250	3,250	5,192	5,719	6,006	6,500	_	41,917
Samantha (Sackler) Hunt	2,100	2,100	2,400	2,600	2,800	3,250	3,250	5,192	5,719	6,006	4,500	_	39,917
Richard S. Sackler <sup>3</sup>	2,100	2,100	2,400	11,568	2,800	3,250	3,250	3,123	1,820	1,820	1,945	-	36,176
David A. Sackler	_	1,477	2,400	2,400	2,400	2,400	2,727	5,192	5,719	5,720	4,750	_	35,185
Jonathan D. Sackler	2,100	2,100	2,400	2,600	2,800	3,250	3,250	3,635	3,899	3,900	4,550	_	34,484
Raymond R. Sackler	2,100	2,100	2,100	2,100	2,100	2,100	2,100	3,375	3,769	2,205			24,049
Rebecca Sackler		_		4,898	6,694			1,729	3,380	3,380	3,900		23,981
Marianna Sackler	_	_		_				_	5,719	5,720	5,720		17,159
Ilene Sackler Lefcourt	1,200	1,200	1,200	1,200	1,200	1,200	1,200	1,662	1,820	1,820	1,945	-	15,647
Jeffrey Lefcourt	_	_	_	-	_	_	_	-	4,550	4,823	3,780	_	13,153
Karen Lefcourt-Taylor	-	-	_	-	-	_	_	_	4,550	4,823	3,780	_	13,153
All Other Sackler Family Members (3)	_	_	_	_	3,431	_	_	2,051	_	770	1,820	_	8,072
Grand Total	\$ 13,800	\$ 15,277	\$ 24,280	\$ 41,715	\$ 38,669	\$ 23,200	\$ 23,527	\$ 36,146	\$ 52,383	\$ 52,713	\$ 49,690	\$ -	\$ 371,400

<sup>&</sup>lt;sup>1</sup> The Sackler Family members included herein received healthcare benefits under Purdue's employee benefits program during this period. The vast majority of the compensation amounts were deducted to cover the Sackler Family member's portion of insurance costs, and the small remainder was paid in cash.

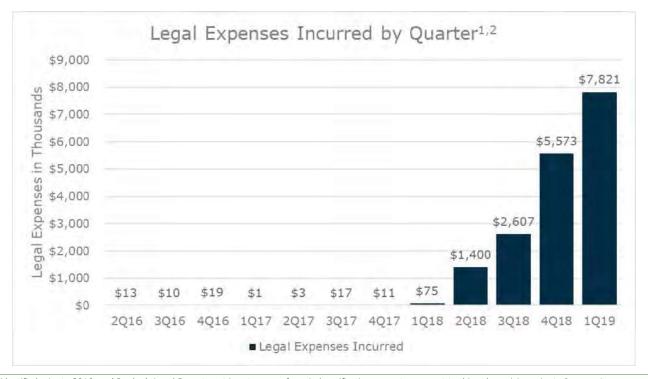
<sup>&</sup>lt;sup>2</sup> Compensation to Kathe A. Sackler in 2010 through 2012 includes approximately \$19,500 in domestic partner medical benefits.

<sup>&</sup>lt;sup>3</sup> Compensation to Richard S. Sackler in 2011 includes approximately \$9,000 in special compensation as reflected in Purdue's payroll records.

# Executive Summary – Legal Expenses Incurred on Behalf of the Sackler Family Members

Since January 1, 2008 forward, Purdue had a corporate indemnity policy (the "Corporate Indemnity Policy") whereby Purdue agreed to pay legal expenses for Purdue's Directors, Officers and other Named Agents (as defined in the policy) when those expenses were related to actions taken in an official capacity.

- Total legal expenses incurred by Purdue on behalf of the Sackler Family members pursuant to the Corporate Indemnity Policy on or after January 1, 2008 were \$17.6 million.
- Purdue ceased payments on behalf of the Sackler Family members for legal services performed after February 28, 2019.



<sup>&</sup>lt;sup>1</sup> No indemnity payments were identified prior to 2016, and Purdue's Legal Department is not aware of any indemnification requests pursuant to this pol cy arising prior to January 1, 2016. We have relied on the Purdue Legal Department's representation that these expenses related to legal services performed on behalf of the Sackler Family members and that Purdue has pa d pursuant to the Corporate Indemnity Policy.

**Alix**Partners

## Executive Summary – Pension Benefits Paid to the Sackler Family Members from Qualified Pension Plan

Total Pension Benefits paid to the Sackler Family members pursuant to Purdue's defined benefit plan ("Purdue's Pension Plan") on or after January 1, 2008 were \$3.0 million. These Pension Benefit payments were made out of the trust assets of Purdue's Pension Plan, which were held separately from Purdue's assets.

Sackler Family Member	Pension Benefit Payment	Retirement Date
Richard S. Sackler	\$ 1,331,758	4/1/2010
Ilene Sackler Lefcourt	319,401	10/1/2011
Kathe A. Sackler	1,316,818	5/1/2013
Total	\$ 2,967,977	

- All three recipients of these Pension Benefits elected to receive lump sum payments, which were paid within one month of their respective retirement dates and in accordance with Purdue's Pensions Plan.
- The pension benefit information listed herein reflects compensation received by certain Sackler Family members prior to 2008, including base salaries and bonuses.

In addition, Jonathan D. Sackler is eligible for an early retirement Pension Benefit but has not elected to receive this benefit as of September 30, 2019. The lump sum present value of the early retirement Pension Benefit was estimated by Deloitte, Purdue's Pension Benefit consultant, to be approximately \$1.1 million as of August 1, 2019. On April 1, 2020, he becomes eligible for full retirement benefits.

Similarly, Mortimer D.A. Sackler becomes eligible for an early retirement Pension Benefit on June 1, 2026, and for a full retirement Pension Benefit on June 1, 2036. According to Deloitte, these dates are too far in the future to accurately estimate the current value of this Pension Benefit.

# Executive Summary – T&E Reimbursements to or for the Benefit of the Sackler Family Members

Purdue paid \$1.9 million in T&E reimbursements to or for the benefit of the Sackler Family members on or after January 1, 2008. No T&E reimbursements have been submitted by or paid to the Sackler Family members after March 31, 2019.

- Airline charges represent the largest category of T&E reimbursements, approximately 65% of T&E reimbursements paid to or for the benefit of the Sackler Family members.
- The remaining T&E categories listed below account for approximately 35% of T&E reimbursements paid to or for the benefit of the Sackler Family members:
  - o Transportation (Taxi, Bus and Other Vehicle)
  - Meals & Entertainment
  - o Hotel Lodging
  - o Other
- In August 2019, at Purdue's request, PRA L.P. repaid Purdue for approximately \$634,000 of these T&E reimbursements for a variety of reasons, including the difficulty in confirming that these reimbursements were properly chargeable to Purdue, resulting in a net payment by Purdue of approximately \$1,276,116.

# **Executive Summary – Reimbursed Fringe Benefits Provided to the Sackler Family Members**

Certain Sackler Family members received Fringe Benefits from Purdue in the form of company paid cellular phones, company fleet vehicles and salary/benefits for personal service employees on or after January 1, 2008.

- Purdue was fully reimbursed for the fleet vehicle costs and personal service employee benefits by the Sackler Family members in the ordinary course on a periodic basis.
- Purdue was not contemporaneously reimbursed for the use of company issued cellular phones. However, in August 2019, PRA L.P. repaid Purdue, at Purdue's request, the full amount (approximately \$477,351) of the costs associated with the Sackler Family members' use of company issued cellular phones on or after January 1, 2008.

	Co	Not ntemporaneously Reimbursed	0	imbursed in the rdinary Course On a Periodic Basis	Reimbursed in the Ordinary Course On a Periodic Basis			
		Cellular Phones	F	leet Vehicles <sup>1</sup>	P	ersonal Service Employees		Total
Total Cost to Purdue	\$	477,351	\$	1,892,705	\$	2,590,800	\$	4,960,856
Contemporaneous Reimbursements / Credits Identified <sup>1</sup>		-		(1,892,705)		(2,590,800)		(4,483,505)
Net Total	\$	477,351	\$	-	\$	-	\$	477,351
Repaid by PRA L.P. in August 2019		(477,351)		-		-		(477,351)
Net Cost to Purdue	\$	-	\$	-	\$	-	\$	-

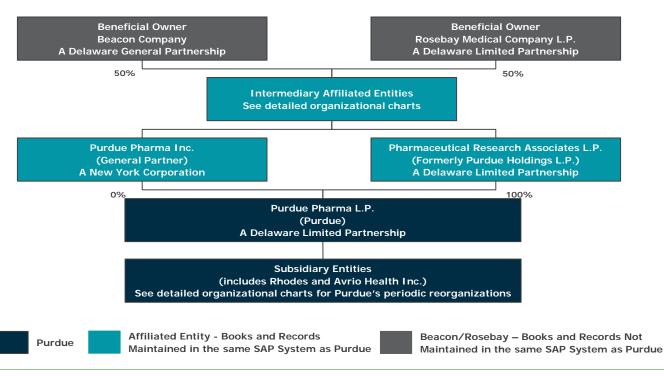
- No Fringe Benefits were provided by Purdue to the Sackler Family members after April 30, 2019.

### **Alix**Partners

### IV. Cash Distributions Analysis

The objectives of the Cash Distributions Analysis include the following:

- 1. Identify and quantify the amount of all Cash Distributions made by Purdue and Rhodes on or after January 1, 2008 to the Affiliated Entities.<sup>1</sup>
  - The organizational structure of Purdue as of May 28, 2019 is illustrated below. This structure, which is current as of the date of this Cash Transfers of Value Report, includes Rhodes as a subsidiary of Purdue. PPLP's subsidiary entities varied over time, as did its ownership interests, with periodic internal reorganizations.
  - Refer to Appendices C and E for more detailed organizational charts for Purdue and Rhodes.



<sup>&</sup>lt;sup>1</sup> The analysis related to Non-Cash Distributions made on or after January 1, 2008 is included in the Intercompany and Non-Cash Transfers Report.

- 2. Identify and quantify the amount of the Cash Distributions made by Purdue and Rhodes on or after January 1, 2008 that Purdue has classified as US Partner Cash Distributions, Ex-US Cash Distributions and Tax Distributions in:
  - Purdue's internally-prepared summary of distributions ("Purdue's Internal Distribution Analysis");
  - Rhodes's internally-prepared distribution analysis ("Rhodes's Internal Distribution Analysis");
  - Audited financial statements; 1 and
  - The October 19, 2018 presentation prepared by Purdue for the Opioid Multidistrict Litigation ("MDL") in the Northern District of Ohio (the "October 19, 2018 MDL Presentation").

- 3. Identify, quantify and reconcile the Cash Distributions made by Purdue and Rhodes to the amounts reported in the following sources of information:
  - Purdue's SAP accounting system;
  - The October 19, 2018 MDL Presentation;
  - Purdue's Internal Distribution Analysis;
  - Rhodes's Internal Distribution Analysis;
  - Purdue and Rhodes's audited financial statements;
  - Purdue's Treasury Department transaction reports;
  - Purdue's notes receivable schedule; and
  - Third-party documents, including:
    - o Relevant bank records, and
    - o Distributions alleged in State Complaints.
- 4. Identify and gain an understanding of the flow of funds activity related to Cash Distributions made by Purdue and Rhodes, including:
  - How Purdue and Rhodes recorded Cash Distributions in its SAP accounting system;
  - The types of information and documentation regarding the flow of funds for Cash Distributions; and
  - The authorization process of Cash Distributions.

- 5. Identify and quantify the amount of Capital Contributions<sup>1</sup> received by Purdue on or after January 1, 2008 in the following sources of information:
  - Purdue's SAP accounting system;
  - The October 19, 2018 MDL Presentation;
  - Purdue's Internal Distribution Analysis; and
  - Audited financial statements.
- 6. Identify and quantify the amount of Capital Contributions<sup>1</sup> that Rhodes received on or after January 1, 2008 in the following sources of information:
  - Purdue's accounting system, which included the accounting system for Rhodes;
  - Distribution authorizations, which contain information related to Capital Contributions received by Rhodes and were provided by Rhodes's Vice President of Finance;
  - Rhodes's Internal Distribution Analysis, which also includes Capital Contributions received by Rhodes;
     and
  - Audited financial statements.
- 7. Identify and gain an understanding of the following regarding Capital Contributions received by Rhodes on or after January 1, 2008:
  - How Capital Contributions were recorded in Rhodes's SAP accounting system;
  - The types of information and documentation regarding the flow of funds for Capital Contributions; and
  - The authorization process for Capital Contributions.

### Cash Distributions Analysis – Procedures Performed

In order to achieve the objectives of the Cash Distributions Analysis, we performed the following procedures:

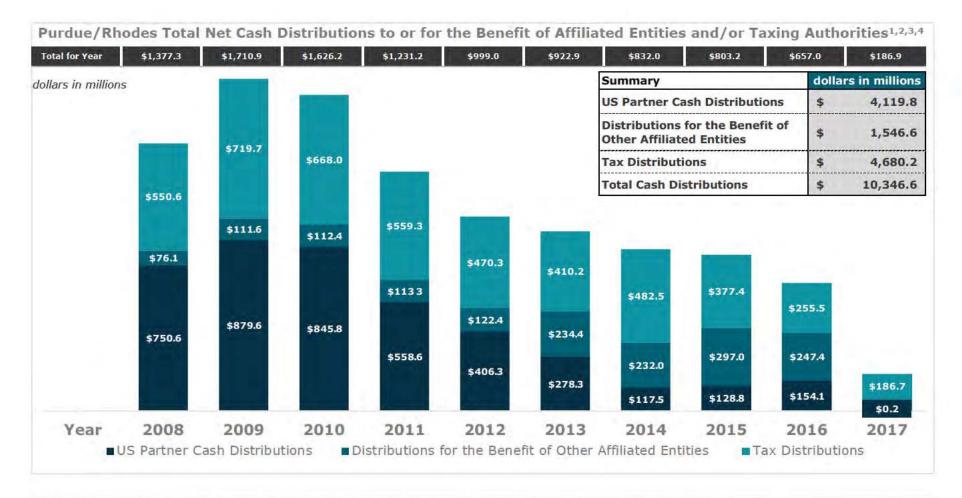
- 1. Collected sources of information and documentation from Purdue.
- 2. Identified, quantified and reconciled Cash Distributions recorded in Purdue's and Rhodes's Internal Distributions Analyses and SAP accounting system, and the October 19, 2018 MDL Presentation.
- 3. Validated and reconciled Cash Distribution amounts reported in Purdue and Rhodes's financial statements and external sources.
- 4. Traced the flow of funds for each Purdue and Rhodes Cash Distribution classification (Non-Tax US Partner, Non-Tax Ex-US and Tax Distributions) made across various years.
  - Refer to Exhibit A for more detailed procedures performed.
  - Refer to Exhibit E for the Purdue Cash Distributions Tracing Analysis.
  - Refer to Exhibit F for the Rhodes Cash Distributions Tracing Analysis.

### **Alix**Partners

# IV.A Combined Purdue and Rhodes Cash Distributions

### **Purdue/Rhodes Cash Distribution Analysis**

- 1. Total Net Cash Distributions paid by Purdue and Rhodes to or for the benefit of the Affiliated Entities and/or taxing authorities on or after January 1, 2008 were \$10.4 billion.
  - Refer to Exhibit C for detailed schedules of Cash Distributions.



<sup>1</sup> The classification of US Partner Cash Distributions, Distributions, Distributions for the Benefit of Other Affiliated Entities and Tax Distributions is based on Purdue's Internal Distributions Analysis and the October 19, 2018 MDL Presentation.

<sup>&</sup>lt;sup>2</sup> Distributions for the Benefit of Other Affiliated Entities correspond with the Ex-US Cash Distributions category in Purdue's Internal Distributions Analysis.

<sup>&</sup>lt;sup>3</sup> 2017 Cash Distributions do not include \$312 6 million of loans to PRA L P., all of which have since been repaid in full with interest. Rhodes paid \$70,000 in Tax Distributions in 2018 which are not included in the chart above. Cash Distributions were not paid from January 1, 2019 through September 30, 2019.

### Purdue/Rhodes Net Cash Distributions - Findings

2. Total Net Cash Distributions paid by Purdue and Rhodes to or for the benefit of the Affiliated Entities on or after January 1, 2008 are included in the table below.

		Purdue	Net Cash Distribu	utions		Rhodes Net Cash Distributions										
dollars in '000s	Purdue US Partner Cash	Purdue Ex-US Cash	Purdue Investment in Associated	Purdue Tax	Purdue Total Cash	Rhodes US Partner Net	Rhodes Tax	Eliminate Purdue Cash Distributions	Rhodes Total Net	Total Net Cash						
Year	Distributions	Distributions 2	Companies 1	Distributions	Distributions	Cash Distributions	Distributions	to Rhodes	<b>Cash Distributions</b>	Distributions						
2008	\$ 752,120	\$ -	\$ 76,107	\$ 540,203	\$ 1,368,430	\$ -	\$ 10,400	\$ (1,500)	\$ 8,900	\$ 1,377,330						
2009	898,949	-	111,576	710,916	1,721,441	-	8,803	(19,301)	(10,498)	1,710,943						
2010	859,950	112,381	-	653,842	1,626,173	-	14,207	(14,200)	7	1,626,180						
2011	553,552	113,306		555,949	1,222,807	25,000	3,346	(20,000)	8,346	1,231,153						
2012	439,342	122,394	-	459,522	1,021,258	6,000	10,745	(39,000)	(22,255)	999,003						
2013	298,319	234,447	-	400,849	933,615	-	9,366	(20,000)	(10,634)	922,981						
2014	127,505	232,023	_	435,569	795,097	-	46,962	(10,000)	36,962	832,059						
2015	128,788	297,019	-	366,111	791,918	_	11,328	_	11,328	803,246						
2016	154,074	247,358	-	249,273	650,705	_	6,199	-	6,199	656,904						
2017	199	_	_	186,541	186,740	-	140	_	140	186,880						
Subtotal 2008-2017	\$ 4,212,798	\$ 1,358,928	\$ 187,683	\$ 4,558,775	\$ 10,318,184	\$ 31,000	\$ 121,496	\$ (124,001)	28,495	\$ 10,346,679						
Addit onal Non-Purdue																
Distribut on Identified																
in Reconciliation to																
State Complaints 3	30,000	-	-	-	30,000	-	-	-	-	30,000						
Total as Adjusted	\$ 4,242,798	\$ 1,358,928	\$ 187,683	\$ 4,558,775	\$ 10,348,184	\$ 31,000	\$ 121,496	\$ (124,001)	\$ 28,495	\$ 10,376,679						

- Cash Distributions generally flowed up from Purdue to and through PRA L.P., and were either invested in IACs, or continued to flow up through other holding companies to trusts established for the benefit of the Sackler Family members or to taxing authorities. Refer to Exhibit E and F for our flow of funds and tracing analyses for Purdue and Rhodes, respectively.
- We did not find any instances where distribution amounts alleged in the State Complaints during a
  particular time period exceeded distributions amounts reported in Purdue's Internal Distribution Analysis
  for that same time period. Refer to Exhibit G for more details.
- Net Cash Distributions contain credits in the amount of \$154.2 million for funds reinvested in Purdue by PRA L.P., and \$17.2 million for tax refunds received by Purdue.
- Purdue did not make any Cash Distributions after 2017.
- Rhodes paid \$70,000 in Tax Distributions in 2018, which are not included in the amounts above. Rhodes did not make any Cash Distributions after 2018.

<sup>1</sup> Purdue recorded \$187.7 million in Ex-US Distributions as Investment in Associated Companies, which represented cash that flowed to a wholly owned entity of Purdue and then to an Ex-US Affiliated Entity.

<sup>&</sup>lt;sup>2</sup> 2017 Cash Distributions do not include \$312.6 million of loans to PRA L P., all of which have since been repaid in full with interest.

<sup>&</sup>lt;sup>3</sup> Additional Non-Purdue Distribution reflects a 2010 distribution made by Millsaw Realty L.P., formerly a subsidiary of Purdue, to Beacon Company and Rosebay Medical Company L.P., apparently made at the direction of Purdue. This amount was identified in the reconciliation to the State Complaints. Refer to Exhibit G for more details regarding this reconciliation.

### Combined Purdue and Rhodes Cash Distributions Identified in SAP

3. As illustrated in the table below, we determined that 99.3% of the gross cash transfer amounts that are reported in Purdue's and Rhodes's Internal Distribution Analyses, which include Cash Distributions and loans made by Purdue to PRA, L.P. in 2017, match the accounts payable vendor/payee name and payment amount that are recorded in Purdue's SAP accounts payable ledger. Refer to Exhibits E and F Cash Distributions tracing analyses for Purdue and Rhodes, respectively.

	Α						В	С	A / (B-C) = D
		Purdue and Rho	odes Distributions I	dentified in Accoເ	ints Payable for A	mount and Payee	(dollars in '000s)		
Year	Cash Transfers to Affiliated Entities / Subsidiaries Identified in Accounts Payable	Total Net Cash Distributions	Cash Transfers Identified in Accounts Payable Related to Loans	Accrued Distributions	Contributions From Purdue to Rhodes	Contributions From Purdue Holdings L.P. and Tax Refunds	Gross Cash Transfers to Affiliated Entities / Subsidiaries	Cash Distributions Not Paid Through Accounts Payable	% Identified in Accounts Payable
2008	\$ 1,382,839	\$ 1,377,330	\$ -	\$ -	\$ 1,500	\$ 8,879	\$ 1,387,709	\$ -	99.6%
2009	1,707,938	1,710,943	-	-	19,301	3,424	1,733,668	-	98.5%
2010	1,629,269	1,626,181	-	-	14,200	2,341	1,642,722	-	99.2%
2011	1,262,969	1,231,153	-	-	20,000	34,095	1,285,248	5,608	98.7%
2012	1,068,617	999,003	-	-	39,000	35,846	1,073,849	4,553	99.9%
2013	957,667	922,981	-	-	20,000	20,236	963,217	4,633	99.9%
2014	867,670	832,059	-	-	10,000	35,486	877,545	3,042	99.2%
2015	913,081	803,245	-	107,000	-	7,413	917,658	3,340	99.9%
2016	568,451	656,904	-	(107,000)	-	23,712	573,616	1,607	99.4%
2017	397,648	186,880	246,739	-	-	-	433,619	35,763	99.9%
Total	\$ 10,756,149	\$ 10,346,679	\$ 246,739	\$ -	\$ 124,001	\$ 171,432	\$ 10,888,851	\$ 58,546	99.3%

- Column C We understand that the following categories of disbursements were recorded by general ledger entry instead of through the SAP accounts payable ledger system:
  - o Fractional distributions made to PPI and PLP Associates Holdings Inc. (e.g., "Sliver Distributions").
  - o A \$35 million Tax Distribution from Purdue to PRA L.P. in 2017.<sup>1</sup>
- Based on discussions with Purdue and TXP, the remaining amounts not identified in the SAP accounts
  payable ledger generally relate to small individual payments to taxing authorities, which are difficult to
  identify due to combination with other items or entries.
- Refer to Appendices D and F for SAP company codes for Purdue and Rhodes, respectively.

### Purdue/Rhodes Cash Distributions Identified in SAP

4. The Purdue and Rhodes cash transfers identified in the SAP accounts payable ledger are summarized below. Refer to Exhibit C for the Purdue and Rhodes detailed schedules of Cash Distributions.

		Purdue and RI	nodes Distribut	ions Identified i	n Accounts Paya	able for Amoun	t and Payee (do	llars in '000s)		
Year	Beacon / Rosebay Non-Tax	Other Affiliated Entities / Subsidiaries	Cumulative Rounding	Total Non-Tax Cash Transfers to Affiliated Entities / Subsidiaries	Beacon / Rosebay Tax	State/Local	Federal	Cumulative Rounding	Total Tax Distributions	Cash Transfers to IACs / Subsidiaries Identified in Accounts Payable
2008	\$ 625,629	\$ 200,478	\$ -	\$ 826,107	\$ 5,879	\$ 30,356	\$ 520,497	\$ -	\$ 556,732	\$ 1,382,839
2009	879,134	111,576	(1)	990,709	363,238	44,486	309,504	1	717,229	1,707,938
2010	862,196	108,709	(1)	970,904	332,445	35,978	289,943	(1)	658,365	1,629,269
2011	599,727	115,114	-	714,841	269,127	39,827	239,175	(1)	548,128	1,262,969
2012	466,900	134,394	-	601,294	232,814	28,372	206,138	(1)	467,323	1,068,617
2013	318,928	230,567	1	549,496	217,747	26,311	164,113	-	408,171	957,667
2014	177,350	210,402	(1)	387,751	255,508	28,255	196,157	(1)	479,919	867,670
2015	320,004	217,725	(1)	537,728	146,340	24,443	204,573	(3)	375,353	913,081
2016	87,591	226,739	-	314,330	123,610	18,869	111,642	-	254,121	568,451
2017	107,013	139,712	-	246,725	72,235	29,088	49,600	-	150,923	397,648
Total	\$ 4,444,472	1,695,416	\$ (3)	\$ 6,139,885	\$ 2,018,943	\$ 305,985	\$ 2,291,342	\$ (6)	\$ 4,616,264	\$ 10,756,149

- The classification of Non-Tax cash transfers and Tax Distributions in the above table is based on Purdue's Internal Distributions Analysis and the October 19, 2018 MDL Presentation.<sup>1</sup>
- The Non-Tax cash transfers include Cash Distributions and \$246.7 million of cash transfers related to loans that Purdue made to PRA L.P. in 2017, which PRA L.P. then transferred to Ex-US Affiliates.
   These loans have since been repaid in full with interest.
- A search was run in the SAP accounts payable ledger to determine if any of the payees known to have received Cash Distributions received any other individual payments in excess of \$1 million that were not recorded as Cash Distributions or loans in Purdue's Internal Distribution Analysis, SAP accounts payable ledger or audited financial statements. The search for payee names included taxing authorities (SAP industry code: TAX) or Affiliated Entities (SAP industry codes: AFIL and DSTD). No instances of unrecorded cash distributions, loans or other cash transfers to these taxing authorities or Affiliated Entities were identified as a result of performing this analysis.
- Refer to Appendices D and F for company names and SAP account information for Purdue and Rhodes, respectively.

### **Alix**Partners

### **IV.B Purdue Cash Distributions**

### **Purdue Cash Distributions – Findings**

1. Total Net Cash Distributions paid by Purdue to or for the benefit of the Affiliated Entities on or after January 1, 2008 are included in the table below. Refer to the Purdue/Rhodes Cash Distributions Analysis section of this Cash Transfers of Value Report for additional information regarding Purdue's Cash Distributions.

	Purdu	e Net Cash Dist	ributions		
dollars in '000s			Investments		
	US Partner	Ex-US	in Associated	Net Tax	Total Net Cash
Year	Net Distributions	Distributions	Companies	Distributions	Distributions
2008	\$ 752,120	\$ -	\$ 76,107	\$ 540,203	\$ 1,368,430
2009	898,949	-	111,576	710,916	1,721,441
2010	859,950	112,381	-	653,842	1,626,173
2011	553,552	113,306	_	555,949	1,222,807
2012	439,342	122,394	-	459,522	1,021,258
2013	298,319	234,447	-	400,849	933,615
2014	127,505	232,023	-	435,569	795,097
2015	128,788	297,019	-	366,111	791,918
2016	154,074	247,358	-	249,273	650,705
2017	199	-	-	186,541	186,740
Subtotal 2008-2017	4,212,798	1,358,928	187,683	4,558,775	10,318,184
Additional Non-Purdue					
Distribution Identified					
in Reconciliation to					
State Complaints	30,000	_	_	_	30,000
Adjusted Total	\$ 4,242,798	\$ 1,358,928	\$ 187,683	\$ 4,558,775	\$ 10,348,184

- The \$439.3 million of US Partner Net Distributions made in 2012 includes two \$6 million Cash Distributions: one to PPI and the other to PLP Associates Holdings Inc.
  - PPI, which is PPLP's general partner, paid \$6 million in dividends to the following Affiliated Entities: \$3 million to Banela Corporation, \$1.5 million to Linarite Holdings LLC and \$1.5 million to Perthlite Holdings LLC.<sup>2</sup>
  - PLP Associates Holdings Inc. paid \$6 million in dividends to the following Affiliated Entities: \$3 million to Banela Corporation, \$1.5 million to Linarite Holdings LLC and \$1.5 million to Perthlite Holdings LLC.
  - o Purdue's Non-Tax Cash Distribution Selection 9, included in the Purdue Cash Distributions Tracing Analysis section, contains an illustration of how the funds flowed from PPLP to PPI and PLP Associates Holdings Inc., which then paid dividends to Affiliated Entities.

<sup>&</sup>lt;sup>1</sup> 2017 Cash Distributions do not include \$312.6 mill on of loans to PRA L.P., all of which have since been repaid in full with interest. Purdue did not make Cash Distributions after 2017.

<sup>2</sup> While our Cash Transfers of Value Analysis related to PPI is ongoing, the only cash dividends pa d by PPI during the period January 1, 2008 through September 30, 2019 that we have identified to date were \$6 million of payments made in 2012.

### Purdue Cash Distribution Reconciliation Results<sup>1</sup>

2. A reconciliation of Purdue's Internal Distribution Analysis to the audited financial statements is summarized below. Refer to Exhibit B for a more detailed reconciliation schedule.

dollars in '000s		2008		2009		2010		2011		2012	2013	2014	2015	2016	2	017
Distributions to Partners:																
Gross US Partner Distributions	\$	752,120	\$	898,949	\$	859,950	\$	585,601	\$	475,188	\$ 318,554	\$ 162,991	\$ 243,201	\$ 70,244	\$	199
Reinvestment in Purdue		· –		· –	Ċ	· –		(32,049)		(35,846)	(20,236)	(35,486)	(7,413)	(23,170)		_
Subtotal Net US Partner Distributions	\$	752,120	\$	898,949	\$	859,950	\$	553,552	\$	439,342	\$298,319	\$127,505	\$ 235,788	\$ 47,074	\$	199
Ex-US Distributions	\$	-	\$	_	\$	112,381	\$	113,306	\$	122,394	\$234,447	\$232,023	\$297,019	\$247,358		-
Classified as distributions per aud t, loans per books															\$ 2	46,739
Subtotal Ex-US Distributions	\$		\$		\$	112,381	\$	113,306	\$	122,394	\$ 234,447	\$ 232,023	\$297,019	\$247,358	\$ 24	16,739
Investment in Associated Companies	\$	76,107	\$	111,576	\$	_	\$	_	\$	_	\$ -	\$ -	\$ -	\$ -	\$	_
Gross Tax Distributions		549,082		714,340		656.183		557,996		459.522	400,849	435,569	366,111	249.815	1	86.541
Tax Refunds Applied		(8,879)		(3,424)		(2,341)		(2,046)		_	_	_	_	(542)		_
Subtotal Tax Distributions	\$	540,203	\$	710,916	\$	653,842	\$	555,949	\$	459,522	\$ 400,849	\$ 435,569	\$ 366,111	\$249,273	\$ 18	6,541
Accrued distribution/reversal		_		_		_		_		_	_	_	(107,000)	107,000		_
Net Cash Distributions	\$ 1	,368,430	\$ 1	1,721,441	\$	1,626,173	\$ 1	1,222,808	\$	1,021,258	\$ 933,615	\$ 795,096	\$ 791,917	\$ 650,705	\$ 18	6,740
Reconciling items to aud t reports		821		762		748		731		731	5,174	2,904	734	2,284	2	57,354
Amount per reconciliation	\$ 1	,369,251	\$ 1	1,722,202	\$	1,626,922	\$ 1	1,223,539	\$ 1	1,021,989	\$ 938,789	\$798,000	\$ 792,651	\$652,989	\$ 44	4,094
Amount per audited financial statements Distributions to Partners from aud ted statements of cash flow Investment in Associated Companies from aud ted	\$		\$	1,610,627	\$	1,626,922	\$	1,223,539	\$	1,021,989	\$ 938,788	\$ 798,000	\$ 792,651	\$ 652,989	\$ 4	44,093
statements of cash flows  Total from audited financial statements	\$ 1	76,108	\$ 1	,	\$	1.626.922	\$ 1	1.223.539	\$	1.021.989	\$ 938.788	\$ 798,000	\$ 792,651	\$ 652,989	\$ 44	4.093
Total Holli duditod illidilolar statements	Ψ 1	,007,232	Ψ	1,,22,203	Ψ	1,020,722	φ	1,220,007	Ψ	1,021,707	\$ 700,700	\$ 7,75,000	Ψ 7 7Z,031	\$ 00Z,707	Ψ	4,073
Difference (rounding)	\$	(1)	\$	(1)	\$	-	\$	-	\$	-	\$ 1	\$ -	\$ -	\$ -	\$	1

- Ex-US Cash Distributions made to Affiliated Entities in 2017 totaling \$312.6 million represent cash transfers to PRA L.P., which PRA L.P. then transferred to Ex-US Affiliates. As required by Generally Accepted Accounting Principles ("GAAP"), \$246.7 million of this amount was recorded as Cash Distributions in Purdue's audited financial statements for the year ended December 31, 2017. PRA L.P. subsequently issued promissory notes for these cash transfers to Purdue, and the full amounts of these loans (\$312.6 million) have since been repaid in full with interest.
- In 2008 and 2009, Purdue reported cash paid to Ex-US Affiliated Entities as an Investment in Associated Companies. These amounts were recorded in audited financial statements as investing activities in the statements of cash flows. After 2010, Ex-US Distributions were recorded as equity distributions and included as such in the audited financial statements of equity and statements of cash flows.<sup>2</sup>

<sup>&</sup>lt;sup>1</sup> The reconciliation above is based on Purdue's audited financial statements that do not include the combined financial results for Rhodes.

<sup>&</sup>lt;sup>2</sup> Purdue recorded \$187.7 million in Ex-US Distributions as Investment in Associated Companies, which represented cash that flowed to a wholly owned entity of Purdue and then to an **AlixPartners** Ex-US Affiliated Ent ty. Purdue subsequently distributed its ownership interest in this subsidiary, which is discussed in the Intercompany and Non-Cash Transfers Report.

#### **Purdue Cash Distribution Reconciliation Results**

3. The table below reconciles Purdue's Net Cash Distributions included in Purdue's Internal Distribution Analysis to the October 19, 2018 MDL Presentation. Non-Cash Distributions are discussed separately in the Intercompany and Non-Cash Transfers Report.

		Pι	Reconciliation	to the October 1	9, 2018 MDL P	resentation						
a	ollars in '000s		dollars in millions									
	US Partner	Ex-US Cash	Associated	Tax	Total Net Cash	Non-Cash	Total	Pι	ırdue	MDL		
Year	Cash Distribution	Distributions	Companies	Distributions	Distributions	Distributions	Distributions	Cash	Non-Cash	Cash	Non-Cash	
2008	\$ 752,120	\$ -	\$ 76,107	\$ 540,203	\$ 1,368,430	\$ 72,378	\$ 1,440,808	\$ 1,368	3 \$ 72	\$ 1,368	\$ 73	
2009	898,949	-	111 <i>,</i> 576	710,916	1,721,441	55,332	1,776,773	1,721	L 55	1,721	55	
2010	859,950	112,381	_	653,842	1,626,173	32,219	1,658,392	1,626	32	1,626	32	
2011	553,552	113,306	-	555,949	1,222,807	-	1,222,807	1,223	3 -	1,223	-	
2012	439,342	122,394	-	459,522	1,021,258	-	1,021,258	1,021	_	1,021	-	
2013	298,319	234,447	_	400,849	933,615	230,096	1,163,711	934	1 230	934	230	
2014	127,505	232,023	_	435,569	795,097	2,171	797,268	795	5 2	795	2	
2015	128,788	297,019	-	366,111	791,918	-	791,918	792	_	899	-	
2016	154,074	247,358	-	249,273	650,705	-	650,705	651	L –	544	-	
2017	199	-	-	186,541	186,740	16,967	203,707	187	7 17	187	17	
Total	\$ 4,212,798	\$ 1,358,928	\$ 187,683	\$ 4,558,775	\$ 10,318,184	\$ 409,163	\$ 10,727,347	\$ 10,318	3 \$ 409	\$ 10,318	\$ 409	

- As illustrated above, the results of our reconciliation validated that Purdue's Net Cash Distribution and Non-Cash Distribution amounts reported in the October 19, 2018 MDL Presentation are consistent with the Net Cash Distributions and Non-Cash Distribution amounts that are recorded in Purdue's Internal Distribution Analysis.
- We did not find any instances where distribution amounts alleged in the State Complaints during a
  particular time period exceeded distributions amounts reported in Purdue's Internal Distribution Analysis
  for that same time period. Refer to Exhibit G for more details.
- The table below summarizes Purdue's Total Cash Transfers and Non-Cash Distributions included in the October 19, 2018 MDL Presentation for the period January 1, 1995 through September 30, 2018.

Summary of Purdue's Total Cash Transfers and Non-Cash Distributions included in the October 19, 2018 MDL Presentation  January 1, 1995 through September 30, 2018 (dollars in millions)							
Purdue's Total Cash and Non-Cash Distributions (January 1, 1995 through December 31, 2007 - not included above)	\$ 1,322						
Purdue's Total Cash and Non-Cash Distributions (January 1, 2008 through September 30, 2018 - included above)	10,727						
Purdue's Loans to PRA L.P. included in the October 19, 2018 MDL Presentation that were Classified as Cash Distributions for financial statement purposes under GAAP as of December 31, 2017 and which have since been repaid in full with interest (as previously explained and not included above)	247						
Rounding Difference	1						
Purdue's Total Cash Transfers and Non-Cash Distributions included in the October 19, 2018 MDL Presentation (January 1, 1995 through September 30, 2018)	\$ 12,297						

<sup>&</sup>lt;sup>1</sup> Purdue recorded an accrued distribution of \$107.0 million as of December 31, 2015, which was not paid until 2016. The October 19, 2018 MDL Presentation reflected distributions in the year accrued. This is a timing difference only and has no net effect on Total Net Cash Distributions for the ten-year period from January 1, 2008 through December 31, 2017.

#### **IV.C Rhodes Cash Distributions**

#### **Rhodes Cash Distributions – Findings**

 Total Cash Distributions paid by Rhodes to or for the benefit of Affiliated Entities on or after January 1, 2008 were \$152.5 million, or \$28.5 million net of \$124.0 million of Capital Contributions received from Purdue. Refer to Exhibit D for detailed Rhodes Cash Distribution schedules.

(dollars in '000s)	Α -	В	C	D	C+D=E	E-B=F	
Year	Cash Distributions from Purdue	Capital Contributions Received by Rhodes	US Partner Cash Distributions by Rhodes	Tax Distributions by Rhodes	Total Cash Distributions by Rhodes	Net Cash Distributions by Rhodes	
2008	\$ 1,500	\$ 1,500	\$ -	\$ 10,400	\$ 10,400	\$ 8,900	
2009	19,301	19,301		8,803	8,803	(10,498)	
2010	14,200	14,200	-	14,207	14,207	7	
2011	20,000	20,000	25,000	3,346	28,346	8,346	
2012	39,000	39,000	6,000	10,745	16,745	(22,255)	
2013	20,000	20,000	-	9,366	9,366	(10,634)	
2014	10,000	10,000	-	46,962	46,962	36,962	
2015	-	-	[+]	11,328	11,328	11,328	
2016	-	-	(#c)	6,199	6,199	6,199	
2017				140	140	140	
Total	\$ 124,001	\$ 124,001	\$ 31,000	\$ 121,496	\$ 152,496	\$ 28,495	

- Rhodes paid \$70,000 in Tax Distributions in 2018, which are not included in the amounts above.
- Rhodes did not make any Cash Distributions after 2018.
- Column A Includes US Partner Cash Distributions made by Purdue and noted as payable to
  Riego/Rosebay¹ with the notation "Rhodes Pharmaceuticals LP Funding" or similar language in the Purdue
  Internal Distribution Analysis. These distributions flowed up from Purdue through its ownership interest to
  Beacon Company and Rosebay Medical L.P., and then were contributed to Rhodes. These amounts are
  included in Purdue's Cash Distribution Analysis.
- Column B Includes Capital Contributions received by Rhodes which originated from Purdue and went through Purdue's ownership interest to Beacon Company and Rosebay Medical L.P, and then were contributed to Rhodes through Coventry Technologies L.P.
- Column C Includes US Partner Cash Distributions made by Rhodes to Affiliated Entities.
- Column D Includes Tax Distributions made by Rhodes to or for the benefit of Affiliated Entities.
- Column F Includes Cash Distributions made by Rhodes, net of Cash Contributions received from Purdue.

<sup>&</sup>lt;sup>1</sup> Beacon Company was formerly known as Riego Company. Note: The classification of US Partner Distributions and Tax Distributions is based on Purdue's and Rhodes's Internal Distribution Analyses.



#### **Rhodes Cash Distributions – Findings**

- 2. \$124.0 million of Total Capital Contributions received by Rhodes were identified and quantified in the Rhodes Internal Distribution Analysis. These Capital Contributions were made by Beacon Company and Rosebay Medical Company L.P.
  - \$124.0 million of Cash Distributions from Purdue are recorded as US Partner Cash Distributions in Purdue's Internal Distribution Analysis as payable through its ownership interest to Beacon Company and Rosebay Medical Company L.P. There is usually a notation in Purdue's Internal Distribution Analysis when Purdue's distributions were ultimately intended as contributions to Rhodes.
  - Of the \$124.0 million in Purdue Cash Distributions received as Capital Contributions by Rhodes, \$116.0 million were specifically identified in Purdue's Internal Distribution Analysis as intended to fund Rhodes and are included in the total of \$10.4 billion in Purdue Total Net Cash Distributions. These payments were validated as to the accounts payable vendor/payee name and distribution amount that are recorded in Purdue's SAP accounts payable ledger.
  - Of the remaining \$8.0 million, receipt of \$6.5 million in Capital Contributions from Beacon Company and Rosebay Medical Company L.P. in 2010 was identified in Rhodes's SAP general ledger.
  - Rhodes paid \$70,000 in Tax Distributions in 2018. No other Cash Distributions were made after 2018.
  - As discussed earlier, Purdue does not provide accounting or administrative services to Beacon Company and Rosebay Medical Company L.P. Therefore, further disposition of Cash Distributions received by those entities cannot be validated based on the books and records maintained in the same SAP accounting system as Purdue and Rhodes.

#### **Rhodes Cash Distributions – Findings**

3. As illustrated in the table below, we determined that at least 99.2% of the Cash Distribution amounts reported in Purdue's and Rhodes's Internal Distribution Analyses match the accounts payable vendor/payee name and distribution amount that are recorded in Purdue's SAP accounting system.

Rhodes Distrib	Rhodes Distributions Identified in Accounts Payable for Amount and Payee (dollars in '000s)													
Year	Amount Identified in Accounts Payable		tal Distributions by Rhodes	% Identified in Accounts Payable										
2008	\$ 10,400	\$	10,400	100.0%										
2009	8,446		8,803	95.9%										
2010	13,957		14,207	98.2%										
2011	28,356		28,346	100.0%										
2012	16,745		16,745	100.0%										
2013	9,366		9,366	100.0%										
2014	46,942		46,962	100.0%										
2015	11,323		11,328	100.0%										
2016	5,540		6,199	89.4%										
2017	140		140	100.0%										
Total	\$ 151,215	\$	152,496	99.2%										

- Based on discussions with Purdue and TXP, the remaining amounts not identified in accounts payable generally relate to Sliver Distributions and small individual payments to taxing authorities, which are difficult to identify due to combination with other items or entries.
- Accounts payable payments are recorded on the applicable payor's accounts payable ledger when payment is made to an Affiliated Entity whose books and records are not maintained in the same SAP accounting system as Purdue and Rhodes.

V. Compensation Paid to or for the Benefit of the Sackler Family Members

#### Compensation Analysis – Objective and Procedures Performed

#### **Objective**

1. To identify and quantify the amount of payments made by Purdue as compensation to or for the benefit of the Sackler Family members on or after January 1, 2008.

#### **Procedures Performed**

The following procedures were performed to achieve this objective:

- 1. Obtained the names of the Sackler Family members from Purdue and cross-checked those names with the names of the Sackler Family members that were identified in public sources, such as the State Complaints and through internet searches.
- 2. Requested and received payroll information for the Sackler Family members who received compensation from Purdue on or after January 1, 2008.
- 3. For the time period when electronic payroll records were available (2016 and forward), searched payroll records for all employees to confirm that no additional Sackler Family members received compensation from Purdue.
- 4. Quantified the payroll compensation paid to the Sackler Family members.
- 5. Extracted other payments made directly to the Sackler Family members as recorded in the SAP accounts payable ledger.

#### Compensation to the Sackler Family Members – Findings

1. Purdue paid approximately \$371,400 in payroll compensation to or for the benefit of the Sackler Family members on or after January 1, 2008. Refer to Appendix B for a list of the Sackler Family member names, titles and relationships.

Sackler Family Member	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	YTD September 30, 2019	Total January 1, 2008 through September 30, 2019
Kathe A. Sackler <sup>2</sup>	\$ 2,100	\$ 2,100	\$ 8,980	\$ 11,749	\$ 11,644	\$ 4,500	\$ 4,500	\$ 4,995	\$ 5,719	\$ 5,720	\$ 6,500	\$ -	\$ 68,507
Mortimer D.A. Sackler	2,100	2,100	2,400	2,600	2,800	3,250	3,250	5,192	5,719	6,006	6,500	_	41,917
Samantha (Sackler) Hunt	2,100	2,100	2,400	2,600	2,800	3,250	3,250	5,192	5,719	6,006	4,500	_	39,917
Richard S. Sackler <sup>3</sup>	2,100	2,100	2,400	11,568	2,800	3,250	3,250	3,123	1,820	1,820	1,945	-	36,176
David A. Sackler	_	1,477	2,400	2,400	2,400	2,400	2,727	5,192	5,719	5,720	4,750	_	35,185
Jonathan D. Sackler	2,100	2,100	2,400	2,600	2,800	3,250	3,250	3,635	3,899	3,900	4,550	_	34,484
Raymond R. Sackler	2,100	2,100	2,100	2,100	2,100	2,100	2,100	3,375	3,769	2,205		_	24,049
Rebecca Sackler				4,898	6,694	_	_	1,729	3,380	3,380	3,900	_	23,981
Marianna Sackler	_	_		_	_				5,719	5,720	5,720		17,159
Ilene Sackler Lefcourt	1,200	1,200	1,200	1,200	1,200	1,200	1,200	1,662	1,820	1,820	1,945	_	15,647
Jeffrey Lefcourt	_	_	_	_	_	_	_	_	4,550	4,823	3,780	_	13,153
Karen Lefcourt-Taylor	-	-	-	-	-	-	-	-	4,550	4,823	3,780	_	13,153
All Other Sackler Family Members (3)	_	_	_	_	3,431	_	_	2,051	_	770	1,820	_	8,072
Grand Total	\$ 13,800	\$ 15,277	\$ 24,280	\$ 41,715	\$ 38,669	\$ 23,200	\$ 23,527	\$ 36,146	\$ 52,383	\$ 52,713	\$ 49,690	\$ -	\$ 371,400

<sup>&</sup>lt;sup>1</sup> The Sackler Family members included herein received healthcare benefits under Purdue's employee benefits program during this period. The vast majority of the compensation amounts were deducted to cover the Sackler Family member's portion of insurance costs, and the small remainder was paid in cash.

<sup>&</sup>lt;sup>2</sup> Compensation to Kathe A. Sackler in 2010 through 2012 includes approximately \$19,500 in domestic partner medical benefits.

<sup>&</sup>lt;sup>3</sup> Compensation to Richard S. Sackler in 2011 includes approximately \$9,000 in special compensation as reflected in Purdue's payroll records.

## VI. Legal Expenses Incurred on Behalf of the Sackler Family Members

#### Legal Expense Analysis - Objective and Procedures Performed

#### **Objective**

1. To quantify the legal expenses incurred by Purdue on behalf of the Sackler Family members pursuant to the Corporate Indemnity Policy during the period on or after January 1, 2008.<sup>1</sup>

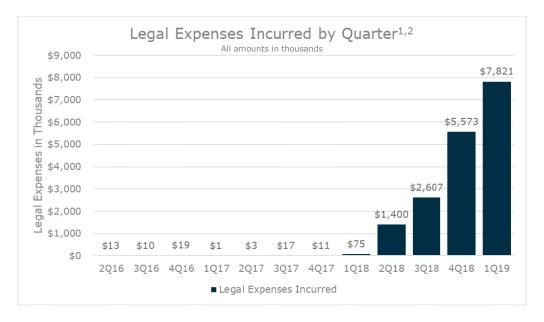
#### **Procedures Performed**

The following procedures were performed to achieve this objective:

- 1. Obtained a list of Purdue's directors & officers from Norton Rose Fulbright US LLP, Purdue's corporate counsel, that served in such capacities on or after January 1, 2008.
- 2. Obtained from Purdue's Legal Department the names of and invoices paid to law firms representing the Sackler Family members, pursuant to its Corporate Indemnity Policy.
- 3. Identified payments made to these law firms in Purdue's SAP accounting system and validated that the payments recorded in SAP were included in the report provided by Purdue's Legal Department.

#### **Legal Expense Analysis – Findings**

- 1. During the period January 1, 2008 forward, Purdue had the Corporate Indemnity Policy in place whereby Purdue agreed to pay legal expenses for Purdue's Directors, Officers and other Named Agents (as defined in the policy) when those expenses were related to actions taken in an official capacity.
  - Total legal expenses incurred by Purdue on behalf of the Sackler Family members pursuant to the Corporate Indemnity Policy on or after January 1, 2008 were \$17.6 million.



- 2. Beginning in 2018, plaintiffs in opioid-related litigation began to name Sackler Family members individually as defendants.
  - Purdue ceased payments on behalf of the Sackler Family members for legal services performed after February 28, 2019.

<sup>1</sup> No indemnity payments were identified prior to 2016, and Purdue's Legal Department is not aware of any indemnification requests pursuant to this pol cy arising prior to January 1, 2016. We have relied on the Purdue Legal Department's representation that these expenses related to legal services performed on behalf of the Sackler Family members, and that Purdue **AixPartners** has pa d pursuant to the Corporate Indemnity Policy.

#### Legal Expense Payments by Law Firm

- 3. The increase in legal expenses was driven by increased spending with lead law firms and the addition of other law firms.
  - The source of the amounts below is Purdue's TeamConnect system as provided by Purdue's Legal Department.<sup>1</sup>
  - The amounts paid to the law firms listed below are shown in the quarter that the legal services were performed. All of these legal expenses have since been paid by Purdue on behalf of the Sackler Family members.

Law Firm	2Q16	3Q16	4Q16	1Q17	2Q17	3Q17	4Q17	1Q18	2Q18	3Q18	4Q18	1Q19	<b>Grand Total</b>
Cameron & Mittleman LLP	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 14	\$ 33	\$ 47
Choate Hall & Stewart LLP	_	_	-	-	-	-	-	_	-	239	122	196	557
Cohen & Gresser LLP	-	-	-	-	-	-	-	_	_	_	_	118	118
Debevoise & Plimpton LLP	-	-	-	-	-	-	-	_	677	1,569	3,951	5,223	11,420
Fitch Law Partners LLP	-	-	-	-	-	-	-	-	-	-	-	18	18
Hawkins Parnell & Young	-	-	-	_	-	-	-	_	-	_	_	3	3
Joseph Hage Aaronson LLC	-	-	-	-	-	-	-	67	707	784	1,307	2,018	4,883
Kelley Jasons McGowan Spinelli													
Hanna & Reber LLP	_	-	-	-	-	_	-	_	-	-	_	32	32
Lum, Drasco & Positan LLC	-	-	-	_	-	-	-	_	15	11	1	1	28
Luther Strange & Associates LLC	_	_	-	_	_	_	_	_	-	_	115	133	248
McDermott Will & Emery	-	-	-	-	-	-	-	_	-	-	-	31	31
Mulinix Goerke & Meyer PPLC	-	-	-	-	-	-	-	_	_	-	9	13	22
Norton Rose Fulbright US LLP	-	-	-	-	-	-	-	-	-	-	54	-	54
Parson Behle & Latimer (for													
Richard Sackler)	13	10	19	1	3	17	11	8	1	4	_	2	89

All amounts in thousands

- No indemnity payments were identified prior to 2016, and Purdue's Legal Department is not aware of any indemnification requests pursuant to this policy arising prior to January 1, 2016.

3 \$ 17 \$ 11 \$ 75 \$1,400

\$ 13 | \$ 10 | \$ 19 | \$ 1 | \$

**Grand Total** 

\$5,573 \$7,821 \$ 17,550

\$ 2,607

## VII. Pension Benefits Paid to Sackler Family Members

#### Pension Benefit Analysis - Objectives and Procedures Performed

#### **Objectives**

- 1. To identify and quantify the amount of Pension Benefits paid to the Sackler Family members on or after January 1, 2008 from Purdue's Pension Plan, which was maintained separately from Purdue's assets; and
- 2. To assess whether Pension Benefits paid to the Sackler Family members appear in accordance with Purdue's Pension Plan policies.

#### **Procedures Performed**

We performed the following procedures to achieve these objectives. Refer to Exhibit H for more detailed procedures.

- 1. Reviewed and analyzed the Pension Benefit calculation worksheets prepared by Deloitte to identify and quantify the Pension Benefits paid to the Sackler Family members.
- 2. For those Sackler Family members who remain eligible for future Pension Benefits, identified and quantified the amount for which they are eligible based on information provided by Deloitte.
- 3. Reviewed Purdue's Pension Plan documents in order to determine if the Sackler Family members who received Pension Benefits under Purdue's Pension Plan were eligible to receive such benefits as defined in Purdue's Pension Plan documents.

#### Pension Benefit Analysis – Findings

1. Total Pension Benefits paid to the Sackler Family members pursuant to Purdue's Pension Plan from January 1, 2008 through December 31, 2018 was \$3.0 million. These Pension Benefit payments were made out of the trust assets of Purdue's Pension Plan, which were held separately from Purdue's assets. As of September 30, 2019, no Pension Benefits were paid to the Sackler Family members after December 31, 2018.

Sackler Family Member	Pension Benefit Payment	Retirement Date
Richard S. Sackler	\$ 1,331,758	4/1/2010
Ilene Sackler Lefcourt	319,401	10/1/2011
Kathe A. Sackler	1,316,818	5/1/2013
Total	\$ 2,967,977	

- All three recipients of these Pension Benefits elected to receive lump sum payments within one month of their respective retirement date and in accordance with Purdue's Pension Plan.
- The Pension Benefit calculations include employee compensation (base salaries and bonuses) earned prior to 2008.
- 2. In addition, Jonathan D. Sackler is eligible for an early retirement Pension Benefit but has not elected to receive this benefit as of September 30, 2019. The lump sum present value of the early retirement Pension Benefit was estimated by Deloitte, Purdue's Pension Benefit consultant, to be approximately \$1.1 million as of August 1, 2019. On April 1, 2020, he becomes eligible for full retirement benefits.
- 3. Similarly, Mortimer D.A. Sackler becomes eligible for an early retirement Pension Benefit on June 1, 2026, and for a full retirement Pension Benefit on June 1, 2036. According to Deloitte, these dates are too far in the future to accurately estimate the current value of this Pension Benefit.

# Travel and Expense Reimbursements to or VIII. for the Benefit of the Sackler Family Members

#### T&E Analysis - Objectives and Procedures Performed

#### **Objective**

1. To identify and quantify T&E reimbursements paid by Purdue to or for the benefit of the Sackler Family members.<sup>1</sup>

#### **Procedures Performed**

In order to achieve this objective, we performed the following procedures:

- 1. Requested T&E report data from Purdue for T&E reimbursements paid by Purdue on or after January 1, 2008. Purdue provided T&E reports starting in April 2011, which is when its current T&E reporting system Databasics went live. T&E report data from Purdue's prior T&E reporting system has been archived and is not available prior to April 2011.
- 2. Identified the Sackler Family members who submitted expense reports.
- 3. Reviewed individual line-item detail for Sackler Family member expense reports.
- 4. Reviewed receipts/supporting documentation submitted with T&E reports for approximately 73% of the total dollar amount of T&E reimbursements made to or for the benefit of the Sackler Family members through Databasics.
- 5. Extracted payments made directly to the Sackler Family members for T&E reimbursement from Purdue's SAP accounts payable ledger on or after January 1, 2008.
- 6. Reviewed T&E reimbursements paid through accounts payable and assigned an expense category to the T&E reimbursements based on the information available in Purdue's SAP accounting system.

Sackler Family members were issued American Express Corporate Credit Cards in their own names, which Purdue paid directly to American Express upon submission of expense reports. Purdue also issued Procurement Cards to various employees; however, none were issued to Sackler Family members.

AlixPartners

#### **T&E Analysis – Findings**

1. Purdue's T&E reimbursements paid to or for the benefit of the Sackler Family members on or after January 1, 2008 are included in the table below. Refer to Exhibit I for more information regarding the detailed procedures performed related to T&E reimbursements:

	T8	E System	Ac	counts Payable	Grand Total
Data Available Since		2011 through aber 31, 2018		nuary 1, 2008 through larch 31, 2019	nuary 1, 2008 through larch 31, 2019
Theresa E. Sackler	\$	-	\$	616,715	\$ 616,715
R chard S. Sackler		554,265		16,502	570,767
Mortimer D.A. Sackler		323,725		-	323,725
Dav d A. Sackler		151,996		-	151,996
Mortimer D. Sackler <sup>1</sup>				95,434	95,434
Jonathan D. Sackler		61,484		-	61,484
Kathe A. Sackler		34,772		118	34,890
Ilene Sackler Lefcourt		21,326		1,884	23,210
Raymond R. Sackler		17,735		380	18,115
Samantha (Sackler) Hunt		_		10,749	10,749
Rebecca Sackler <sup>2</sup>		1,934		55	1,989
Beverly Sackler		-		1,042	1,042
Grand Total	\$	1,167,237	\$	742,879	\$ 1,910,116

- Sources of T&E reimbursements include:
  - Purdue's T&E reports from Databasics, which are available starting in April 2011, and supporting documentation. As of September 30, 2019, no T&E reimbursements had been submitted by or paid to the Sackler Family members through Databasics after December 31, 2018.
  - Purdue's SAP accounts payable ledger (data available from 2008) and supporting documentation. As of September 30, 2019, no T&E reimbursements had been submitted by or paid to the Sackler Family members through Accounts Payable after March 31, 2019.
  - PPLP was the only Purdue entity that paid T&E reimbursements to or on behalf of the Sackler Family members during this time period.
- 2. In August 2019, at Purdue's request, PRA L.P. repaid Purdue for approximately \$634,000 of these T&E reimbursements for a variety of reasons, including the difficulty in confirming that these reimbursements were properly chargeable to Purdue, resulting in a net payment by Purdue of approximately \$1,276,116.

<sup>&</sup>lt;sup>1</sup> Based on documentation in SAP, the total cost of the plane charter was approximately \$107,000, of which approximately \$12,000 was reimbursed to Theresa E. Sackler and the remaining approximately \$95,000 was reimbursed to Mortimer D. Sackler. These amounts were repaid to Purdue by PRA L.P. in August 2019.

<sup>&</sup>lt;sup>2</sup> It appears that the same \$55 expense was included in Rebecca Sackler's T&E system report and accounts payable reimbursements.

## IX. Fringe Benefits Provided to Sackler Family Members

#### Fringe Benefits Analysis – Objectives and Procedures Performed

#### **Objective**

- 1. To identify and quantify the expenses paid by Purdue for the following Fringe Benefits received by the Sackler Family members:
  - Cellular phones and service plans;
  - Fleet vehicles; and
  - Personal service employees.

#### **Procedures Performed**

In order to achieve this objective, we performed the following procedures:

- 1. Met with various Purdue, TXP and One Stamford Realty employees to discuss the Fringe Benefits;
- 2. Reviewed and analyzed documentation maintained by Purdue, TXP and One Stamford Realty related to the Fringe Benefits;
- 3. Reviewed and analyzed Purdue's SAP accounting system in order to quantify amounts billed to Sackler Family members and amounts reimbursed to Purdue by Sackler Family members; and
- 4. Selected a portion of the fleet vehicle and personal service employee reimbursements that the Sackler Family members made by wire transfer and traced those amounts to Purdue's available bank statements.

#### Fringe Benefits Analysis – Findings

- 1. Based on discussions with employees of TXP and One Stamford Realty, certain Sackler Family members received the following types of Fringe Benefits on or after January 1, 2008:
  - **Cellular phones** Purdue provided cell phones to certain Sackler Family members and paid for monthly service charges. These costs were not contemporaneously reimbursed by the Sackler Family members.
  - Fleet vehicles Purdue leased vehicles through an external service provider (Wheels, Inc.), which were
    used by certain Sackler Family members and fully reimbursed to Purdue in the ordinary course on a
    periodic basis.
  - Personal service employees Three Sackler Family members had personal service employees on Purdue's payroll and benefits plan. Purdue paid and provided benefits for these employees over the relevant pay periods and was fully reimbursed by the Sackler Family members, or trusts associated with Sackler Family members, in the ordinary course on a periodic basis.
- 2. Purdue was not contemporaneously reimbursed for the use of company issued cellular phones. However, in August 2019, PRA L.P. repaid Purdue, at Purdue's request, the full amount (approximately \$477,351) of the costs associated with the Sackler Family members' use of company-issued cellular phones on or after January 1, 2008.

	Со	Not ntemporaneously Reimbursed	Ordin On a	ursed in the ary Course a Periodic Basis	О	imbursed in the rdinary Course On a Periodic Basis	
		Cellular Phones	Flee	t Vehicles <sup>1</sup>	P	ersonal Service Employees	Total
Total Cost to Purdue	\$	477,351	\$	1,892,705	\$	2,590,800	\$ 4,960,856
Contemporaneous Reimbursements / Credits Identified <sup>1</sup>		-		(1,892,705)		(2,590,800)	(4,483,505)
Net Total	\$	477,351	\$	-	\$	-	\$ 477,351
Repaid by PRA L.P. in August 2019		(477,351)		-		-	(477,351)
Net Cost to Purdue	\$	-	\$	-	\$	-	\$ -

- No Fringe Benefits were provided by Purdue to the Sackler Family members after April 30, 2019.
- The benefit categories outlined above and amounts associated with each category were obtained from reports prepared by TXP and Purdue's books and records.

<sup>&</sup>lt;sup>1</sup> Reimbursements include credits related to approximately \$6,400 in Fleet invoice overcharges and \$4,600 in automobile maintenance costs. It is our understanding that Fleet Vehicle expenses were reimbursed by the Sackler Family members in the ordinary course. However, based on the information available in SAP and discussions with TXP, it is unclear if Purdue was reimbursed for \$4,600 in automobile maintenance costs.

#### X. Exhibits

#### **Index of Exhibits**

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## **Exhibit A - Cash Distributions Analysis, Detailed Procedures Performed**

## **Exhibit A - Cash Distributions Analysis, Detailed Procedures Performed**

In order to achieve the objectives of the Purdue and Rhodes Cash Distribution Analysis,<sup>1</sup> we performed the following procedures:

- 1. Collected information and documents from Purdue, Rhodes and TXP:
  - Accessed and reviewed accounting, financial and other relevant information from Purdue, Rhodes and TXP for purposes of understanding the types of information available related to Cash Distributions identifying and quantifying the Cash Distributions made by Purdue and Rhodes from January 1, 2008 through December 31, 2018, to or for the benefit of the Affiliated Entities, including those Cash Distributions made as Capital Contributions by Purdue to Rhodes.
    - Purdue's financial statements were audited by Ernst & Young LLP for the years ended December 31, 2002 through 2017. The audit opinion states that the audits were conducted in accordance with generally accepting auditing standards ("GAAS") and Purdue's financial statements were prepared in accordance with GAAP.
    - o For the year ended December 31, 2018, audit fieldwork has largely been completed, but the audited financial statements have not been finalized due to the pending court appointment of Ernst & Young LLP as Purdue's auditors.
  - Cash Distributions were not paid from January 1, 2019 through September 30, 2019.

### Exhibit A - Cash Distributions Analysis, Detailed Procedures Performed

- 2. Identified, quantified and reconciled Cash Distributions and loans made that are recorded in Purdue and Rhodes's SAP accounting system:
  - Identified relevant Purdue general ledger accounts and company codes that Cash Distributions were recorded in/under.
  - Identified and quantified Cash Distributions in total, and by payee, made by Purdue and Rhodes from January 1, 2008 through December 31, 2018, as recorded in its SAP accounting system and accounts payable ledger.
    - Purdue Cash Distributions usually flowed up to and through one or more Affiliated Entities. The payor name recorded in Purdue's SAP accounts payable ledger usually was the payee of the last Affiliated Entity in a Cash Distribution's flow of funds structure whose books and records are maintained in the same SAP accounting system as Purdue and Rhodes;
    - o Payee names included Beacon Company, Rosebay Medical Company L.P., other Affiliated Entities (usually Ex-US Affiliated Entities) and various taxing authorities; and
    - o The books and records for Beacon Company, Rosebay Medical Company L.P. and Ex-US Affiliated Entities are not maintained in the same SAP accounting system as Purdue and Rhodes. Therefore, further disposition of Cash Distributions received by those entities cannot be validated based on the books and records maintained in the same SAP accounting system as Purdue and Rhodes.
- 3. Validated and reconciled Cash Distribution amounts reported in financial statements and external sources:
  - Reconciled Cash Distribution amounts made by Purdue from January 1, 2008 through December 31, 2017, as recorded in the SAP accounting system to the Cash Distribution amounts recorded in Purdue's audited financial statements for the years ended December 31, 2008 through 2017.<sup>1</sup>
    - This included summarizing the Combined Statements of Equity and Combined Statements of Cash Flows by year to capture Cash Distribution amounts as reported in the financial statements.

#### **Exhibit A - Cash Distributions Analysis, Detailed Procedures Performed**

- 4. Reviewed and validated the Purdue cash transfer amounts reported in the October 19, 2018 MDL Presentation and Purdue's Internal Distribution Analysis:
  - This included identifying and quantifying Cash Distributions that Purdue classified as US Partner Cash Distributions, Ex-US Cash Distributions, Investment in Associated Companies and Tax Distributions.
  - This included identifying and quantifying amounts Purdue reported as loans and reviewing Purdue's schedule of notes receivable activity.
- 5. Reconciled the Cash Distribution amounts reported in Purdue's and Rhodes's Internal Distribution Analyses to the Cash Distribution amounts recorded in audited financial statements for the years ended December 31, 2008 through 2017.1
- 6. Validated the gross cash transfer amounts reported in Purdue's Internal Distribution Analysis by matching to the accounts payable vendor/payee name and distribution amount that is recorded in Purdue's accounts payable ledger.
- 7. Traced the accounts payable vendor/payee names and cash transfer amounts recorded in Purdue's SAP accounting system using available bank statements, generally from July 2014 forward.
- 8. Reviewed various State Complaints filed against Purdue and the Sackler Family members and reconciled the distribution amounts referenced therein to Purdue's Internal Distribution Analysis.

### **Exhibit A - Cash Distributions Analysis, Detailed Procedures Performed**

- 9. Traced the flow of funds for Purdue and Rhodes Cash Distributions and loans made by Purdue:
  - Selected each type of Cash Distribution classification (Non-Tax US Partner, Non-Tax Ex-US and Tax Distributions) included in Purdue's and Rhodes's Internal Distributions Analyses and the October 19, 2018 MDL Presentation across various years from January 1, 2008 through December 31, 2018, for testing in order to:1
    - Obtain the relevant documents maintained in Purdue and Rhode's SAP accounting system for each distribution, including SAP transaction detail, Written Consents and other documents from the general partners authorizing distributions, Treasury Department reports, wire instructions and tax calculations;
    - o Gain an understanding of how each distribution is recorded in Purdue's SAP accounting system;
    - Document the flow of funds for each distribution from Purdue up to and through Affiliated Entities based upon general ledger detail, wire instructions, bank statements and documents with approvals for each distribution;
    - Validate whether the payees/recipients of distributions that are recorded in Purdue's SAP accounting system match the payees/recipients referenced in the distribution authorization documents;
    - Validate whether the payees/recipients of distributions that are recorded in Purdue's SAP accounting system match the payees/recipients referenced in the wire instructions and/or bank statements;
    - Validate whether the name of the recipient of the distribution and distribution amount reported in Purdue's Internal Distribution Analysis matches the payee/recipient's name and amount recorded in Purdue's SAP accounting system; and
    - Assess whether the documents maintained in Purdue and Rhodes's SAP accounting system provide support for how Purdue classified the distribution in Purdue's Internal Distribution Analysis as either US Partner Cash Distributions, Ex-US Cash Distributions or Tax Distributions.

<sup>&</sup>lt;sup>1</sup> The classification of distributions presented in this Cash Transfers of Value Report is based upon Purdue's and Rhode's Internal Distribution Analyses and the October 19, 2018 MDL Presentation.

### Exhibit A - Cash Distributions Analysis, Detailed Procedures Performed

- 10. Accessed and reviewed information and documents from Purdue, Rhodes and TXP employees:
  - Held meetings and/or communicated with Purdue, Rhodes and TXP to gain an understanding of the
    accounting for and quantification of Cash Distributions made by Purdue and Rhodes from January 1,
    2008 through December 31, 2018, including the types of documentation that are maintained by Purdue
    and Rhodes for distributions.
    - A list of the Purdue, Rhodes and TXP employees we met with and/or communicated with about Cash Distributions is included in Appendix A.

# Exhibit B – Detailed Reconciliation of Purdue Net Cash Distributions to Audited Financial Statements

## Exhibit B - Reconciliation of Purdue's Internal Distribution Analysis to Purdue's Audited Financial Statements<sup>1</sup>

Description		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2008 to 2017
US Partner Net Cash Distributions:	\$	7F2 110 002 A	898 949 268 \$	050 050 004 #	E0E C01 042 A	475 107 604	A 210 FF2 F07	A 162 001 407	A 242 201 102	A 70 242 016 A	100 544	4 366 006 60
Purdue's Internal Distribution Analysis (Purdue)	\$	752,119,882 \$	898,949,268 \$	859,950,094 \$	585,601,043 \$	475,187,684	\$ 318,553,587	\$ 162,991,487	\$ 243,201,192	\$ 70,243,916 \$	198,544 \$	4,366,996,697
Distributions from other Purdue entities  Norwell Land Company (non-wholly owned Purdue subsidiary)					542,902	542,902	4,975,142	542,902	542,902	542,902	10,332,132	18,021,784
Koltan Pharmaceuticals (non-Purdue subsidiary)		-	-	-	542,902	542,902	4,975,142	2,170,802	542,902	542,902	10,332,132	2,170,80
Ikuwa Holdings, Inc. (non-Purdue subsidiary)		_	_	-	_	_	_	2,170,002	_	_	260,049	2,170,80
Reinvestment in Purdue (contra distribution)					(32,049,000)	(35,846,302)	(20,235,500)	(35,486,411)	(7,412,907)	(23,170,000)	200,049	(154,200,120
Accrued Distribution/Reversal					(32,043,000)	(33,040,302)	(20,233,300)	(33,400,411)	(107,000,000)	107,000,000		(134,200,120
Accrued Distribution, Non-Cash									(107,000,000)	(282 925)		(282 925
US Partner Net Cash Distributions per audited financial statements	+	752 119 882 \$	898 949 268 \$	859 950 094 \$	554 094 945 \$	439 884 284	\$ 303 293 229	\$ 130 218 780	\$ 129 331 187	\$ 154 333 893 \$	10 790 725 \$	4 232 966 28
33 Fartier Net Cash Distributions per addited illiancial statements		732 119 002 \$	030 343 200 ş	039 930 094 \$	334 034 343 \$	439 004 204	\$ 303 293 229	\$ 130 210 700	\$ 129 331 107	\$ 134 333 693 \$	10 / 90 / 23 3	4 232 300 20
Ex-US Distributions from Purdue's Internal Distribution Analysis	\$	- \$	- \$	112,381,191 \$	113,306,433 \$	122,393,943	\$ 234,447,279	\$ 232,022,691	\$ 297,018,519	\$ 247,357,896 \$	- \$	1,358,927,95
Ex-US Distributions per audited financial statements		- \$	- \$	- \$	- \$	-	\$ -	\$ -	\$ -	\$ - \$	246,739,484 \$	246,739,48
		-	-	112 381 191	113 306 433	122 393 943	234 447 279	232 022 691	297 018 519	247 357 896	246 739 484 \$	1 605 667 43
JS Partner Net Cash Distributions plus Ex-US Cash Distributions	\$	752,119,882 \$	898,949,268 \$	972,331,285 \$	667,401,378 \$	562,278,227	\$ 537,740,508	\$ 362,241,471	\$ 426,349,706	\$ 401,691,789 \$	257,530,209 \$	5,838,633,72
Tax Distributions:		540,000,447, 4	744 222 222 +	656 400 700 4	FF7 00F 60F +	450 500 470		+ 405 560 070	. 200 440 670	+ 242 244 252 +	100 511 370 1	4 575 000 45
Purdue's Internal Distribution Analysis (Purdue) (gross)	\$	549,082,447 \$	714,339,900 \$	656,182,792 \$	557,995,625 \$	459,522,179	\$ 400,849,386	\$ 435,568,873	\$ 366,110,679	\$ 249,814,863 \$	186,541,378 \$	
Tax Refunds Applied		(8,879,329)	(3,424,171)	(2,340,574)	(2,046,451)	40.000	45.000	40.050	40.050	\$ (541,675)	40.050	(17,232,20
Purdue Assoc LP - US Trust 12/26/96		10,000	10,000	10,000	10,000	10,000	15,000	10,850	10,850	10,850	10,850	108,40
Purdue Assoc LP - Trust B 11/5/74		10,000	10,000	10,000	10,000	10,000	15,000	10,850	10,850	10,850	10,850	108,40
Norwell - Varus		8,742	-	-	-	-	-	-	-	-	-	8,74
Norwell - Regio		41,144	14,529	8,404	-	-	-	-	-	917,000	684	981,76
Norwell JDS Trust		19,912	7,925	4,202	-	-	-	-	-	458,500	-	490,53
Norwell RSS Trust		19,913	7,923	4,202	-	-	-	-	-	458,500	-	490,53
Norwell Fixed Equity		711 374	711 373	711 373	168 471	168 471	168 471	168 471	169 155	168 471	-	3 145 63
ax Distributions per audited financial statements	\$	541,024,203 \$	711,677,479 \$	654,590,399 \$	556,137,645 \$	459,710,650	\$ 401,047,857	\$ 435,759,044	\$ 366,301,534	\$ 251,297,359 \$	186,563,762 \$	4,564,109,93
Partner/Ex-US Distributions per audited financial statements		752,119,882 \$	898.949.268 \$	972.331.285 \$	667,401,378 \$	E63 370 337	¢ 527.740.500	¢ 262 241 471	¢ 426 240 706	\$ 401,691,789 \$	357 530 300 ¢	5,838,633,72
Fax Distributions per audited financial statements	÷.	541 024 203 \$	711 677 479 \$	654 590 399 \$	556 137 645 \$					\$ 251 297 359 \$		4 564 109 93
Tax Distributions per addited financial statements	\$	1,293,144,085 \$	1,610,626,747 \$	1,626,921,684 \$	1,223,539,023 \$					\$ 652,989,148 \$		
Recap:												
Net Cash Distributions (dollars in 000's)												
Net Partner		752,120	898,949	859,950	554,095	439,884	303,293	130,219	129,331	154,334	10,791	4,232,96
Ex-US		_	_	112,381	113,306	122,394	234,447	232,023	297,019	247,358	246,739	1,605,66
Tax		541 024	711 677	654 590	556 138	459 711	401 048	435 759	366 302	251 297	186 564	4 564 11
otal Net Cash Distribution		1,293,144	1,610,627	1,626,922	1,223,539	1,021,989	938,788	798,001	792,651	652,989	444,094	10,402,74
let Cash Distributions From audited financial statements (dollars in 000's)												
Tax									366,302	251,297	186,563	
Non-Tax									426 349	401 692	257 530	
Total Net Cash Distributions per Audit		1,293,144	1,610,627	1,626,922	1,223,539	1,021,989	938,788	798,000	792,651	652,989	444,093	10,402,74
Difference	\$	- \$	- \$	- \$	- \$	-	\$ -	\$ 1	\$ -	\$ - \$	1 \$	
Purdue Distributions:												
JS Partner Gross Cash Distribution	\$	752,119,882 \$	898,949,268 \$	859,950,094 \$	585,601,043 \$	475.187.684	\$ 318,553,587	\$ 162,991,487	\$ 243,201,192	\$ 70,243,916 \$	198,544 \$	4,366,996,69
Ardsley US Partner Net Cash Distribution Included in Total	Ψ.	\$	σσογστογεσο φ	033,330,031 4	505/001/015 <b></b>	175/107/001	4 510,555,507	Ψ 102/331/10/	ψ L10/L01/13L	φ /0/2/3/310 φ	\$	1,500,550,05
ccrued Distribution/Reversal		Ψ							\$ (107,000,000)	¢ 107 000 000	4	
einvestment in Purdue (contra distribution)	d	_ ¢	_ &	_ \$	(32,049,000) \$	(35,846,302)	¢ (20.225.500)	\$ (35,486,411)			_ ¢	(154,200,12
S Partner Net Cash Distribution	\$	752.119.882 \$	898.949.268 \$	859.950.094 \$	553.552.043 \$		\$ 298.318.087	\$ 127,505,076		\$ 154.073.916 \$	198,544 \$	
x-US Cash Distributions	Ф	132,117,002 D	0/0/747/200 D	112,381,191	113,306,433	122,393,943	234,447,279	232,022,691	297,018,519	247.357.896		1,358,927,9
		74 107 444	111 574 000	112,301,171	113,300,433	122,373,743	234,441,219	232,022,091	271,010,519	241,331,096	- \$ \$	
nvestment in Associated Companies		76,107,446	111,576,000	CEC 100 700	FF7 00F 63F	450 522 470	400 040 225	425 500 672	266 110 672	240.014.062		
Fross Tax Distributions		549,082,447	714,339,900	656,182,792	557,995,625	459,522,179	400,849,386	435,568,873	366,110,679	249,814,863	186,541,378 \$	
ax Refunds		(8,879,329)	(3,424,171)	(2,340,574)	(2,046,451)	-				(541,675)	-	(17,232,20
let Tax Distributions		540,203,118	710,915,729	653,842,218	555,949,174	459,522,179	400,849,386	435,568,873	366,110,679	249,273,188	186,541,378	4,558,775,92
Total Purdue Cash Distributions	\$ 1,	,368,430,446 \$ 1	1,721,440,997 \$	1,626,173,503 \$	1,222,807,650 \$	1,021,257,504	\$ 933,614,752	\$ 795,096,640	\$ 791,917,483	\$650,705,000 \$	186,739,922 \$	10,318,183,89

Total Purdue Distributions	\$ 10,318,183,897		
Less amounts shown as Investment in Associated Companies	(187,683,446)		
Subtotal - equity distributions per books	\$ 10,130,500,451		
Reconciling items:			
Cash distributions by non-wholly owned/non-Purdue subsidiaries (a,b,c)	20,452,635		
Tax distributions by non-wholly owned/non-Purdue subsidiaries (a,b,c)	5,334,010		
Accrued distribution in 2016 not paid (e)	(282,925)		
Loans treated as distributions (f)	246 739 484		
Total reconciling items	\$ 272,243,204		
Total equity distributions per audited financial statements	\$ 10,402,743,655		

- Notes to this reconciliation are included on the following two pages.
- Variance in certain amounts due to rounding differences.

 $<sup>^1</sup>$  The reconciliation above is based on Purdue's audited financials statements that do not include the combined financial results for Rhodes.

#### Exhibit B - Reconciliation of Purdue's Internal Distribution Analysis to Purdue's Audited Financial Statements

Notes to Reconciliation of Purdue's Internal Distribution Analysis to audited financial statements:

a) PPLP was a Class B partner in Norwell Land Company, a non-wholly owned Purdue subsidiary ("Norwell"). PPLP had 73.928% participation in profits/distributions of Norwell and other Affiliated Entities had 26.072%.

Because the Cash Distributions shown in the October 19, 2018 MDL Presentation were intended to represent distributions of PPLP and its 100% owned subsidiaries, the \$10,318 million of Cash Distributions included in the October 19, 2018 MDL Presentation do not include \$23.1 million in distributions paid by Norwell to the Affiliated Entities, which held a 26.072% participation interest. This \$23.1 million in distributions were not made to PPLP and are not included in Purdue's Total Net Cash Distributions.

The audited financial statements of Purdue which combine Norwell's financial results include the \$23.1 million of distributions to Affiliated Entities, and therefore the \$23.1 million is listed as a reconciling difference between the October 19, 2018 MDL Presentation and the audited financial statements on the previous page. For the sake of clarification, this \$23.1 million distribution was transferred from Norwell (a non-wholly owned subsidiary of PPLP) to Affiliated Entities, and not to PPLP.

- b) Koltan Pharmaceutical shares, classified as marketable securities, were distributed by PPLP in 2014 and included as a cash distribution in the audited financial statements. The \$2.1 million distribution was shown in Purdue's Internal Distribution Analysis as a Non-Cash Distribution and is addressed in the Intercompany and Non-Cash Transfers Report.
- c) Ikuwa Holdings, Inc., a non-Purdue subsidiary, paid approximately \$260,000 of distributions in 2017. This distribution amount was not included in Purdue's Total Net Cash Distributions.

#### Exhibit B - Reconciliation of Purdue's Internal Distribution Analysis to Purdue's Audited Financial Statements

- d) Purdue's Internal Distribution Analysis reflects gross cash distributions which are offset by reinvestment in the cumulative amount of \$154.2 million and tax refunds in the cumulative amount of \$17.2 million to arrive at Net Cash Distributions.
- e) The October 19, 2018 MDL Presentation reported a \$107.0 million accrued distribution as of December 31, 2015. The Purdue Net Cash Distributions include the \$107.0 million as a 2016 item, the year it was actually paid. As a result there is a timing difference between the October 19, 2018 MDL Presentation which reported distributions on an accrual basis and Purdue Net Cash Distribution which are reported on a cash basis. There is no effect on the Total Net Cash Distributions for the period from January 1, 2008 through December 31, 2017.
- f) Ex-US Cash Distributions made to Affiliated Entities in 2017 totaling \$312.6 million represent cash transfers to PRA L.P. which PRA L.P. then transferred to Ex-US Affiliates. As required by GAAP, \$246.7 million of this amount was recorded as Cash Distributions in Purdue's audited financial statements for the year ended December 31, 2017. PRA L.P. subsequently issued promissory notes for these cash transfers to Purdue, and the full amounts of these loans (\$312.6 million) have since been repaid in full with interest.
- g) In 2008 and 2009, Purdue reported cash paid to Ex-US Affiliated Entities as an Investment in Associated Companies, which represented cash that flowed to a wholly owned entity of Purdue and then to an Ex-US Affiliated Entity. These amounts were recorded in audited financial statements as investing activities in the statements of cash flows.

## Exhibit C – Combined Purdue and Rhodes Detailed Schedules of Cash Transfers

Based upon the reconciliation and testing work we performed on the distribution and loan information reported in the October 19, 2018 MDL Presentation, Purdue's Internal Distribution Analysis, Purdue's audited financial statements and Purdue's SAP accounting system, we have prepared detailed cash transfer schedules included in this Exhibit.

Source: Distribution and loan amounts reported in the Purdue Internal Distribution Analysis and identified in Purdue's SAP accounting system (accounts payable). Distribution and loan classifications (Tax and Non-Tax) used herein are based upon Purdue's Internal Distribution Analysis and the October 19, 2018 MDL Presentation.

Note: Distributions to Beacon Company are included in the payee names Beacon Co and Beacon Trust Company Limited.

### Exhibit C – Purdue and Rhodes Detailed Schedules of Cash Transfers

The schedules presented on the following pages show cash transfers by payee and payor as recorded in Purdue and Rhodes's SAP accounts payable ledger.

- As illustrated in the flow of funds analysis section of this Cash Transfers of Value Report, Cash
  Distributions ordinarily flowed up from Purdue and passed through to one or more intermediate Affiliated
  Entities before reaching the intended recipient of the distribution (according to the distribution
  authorization documents obtained from the SAP accounting system).
- The SAP payor entity that is listed represents the last entity making a distribution whose books and records are maintained in the same SAP accounting system as Purdue and Rhodes.¹ The intermediate transfers passed through the Affiliated Entities whose books and records are maintained in the same SAP accounting system as Purdue and Rhodes are usually recorded by general ledger entry and not through accounts payable.
- The SAP payee entity appears as the last entity that was paid by the payor entity whose books and records are maintained in the same SAP accounting system as Purdue and Rhodes. The SAP payee entities are listed in the schedules on the following pages, and the books and records of those payee entities are not maintained in the same SAP accounting system as Purdue and Rhodes.
- The classifications of Cash Distributions and loans as Tax and Non-Tax are based upon Purdue's and Rhodes's Internal Distribution Analyses and the October 19, 2018 MDL Presentation.

### Exhibit C – Purdue and Rhodes Detailed Schedules of Cash Transfers

Non-Tax Cash Transfers Identified in Accounts Payable<sup>1</sup> (dollars in thousands)

SAP Payee	2008	2009	2010	2011	2012	2013	2014	2015	2015	2017	Total
ROSEBAY MEDICAL COMPANY LP	\$ 375,000 \$	439,567 \$	431,098 \$	299,851 \$	233,450 \$	159,464 \$	88,675 \$	154,287 \$	37,643 \$	1,483 \$	2,220,518
BEACON CO	-	14,871	431,098	299,876	233,450	159,464	88,675	154,017	37,643	1,483	1,420,577
BEACON TRUST COMPANY LIMITED	250,629	424,696	•		-		•		***************************************		675,325
LUCIEN HOLDINGS SARL / SUBSIDIARIES	76,107	111,576	•	1,104	1,042	890	29,286	31,348	11,359	42,157	304,869
IND SARL	-		20,843	38,622	42,079	51,082	23,988	6,441		-	183,055
FLIRA SARL	-	•	19,835	24,955	28,155	35,942	16,801	6,635	6,324	-	138,647
MUNDIPHARMA KK	-	-	32,869	1,058	-	8,379	5,492	21,860	36,008	26,703	132,369
MUNDIPHARMA SINGAPORE								11,700	12,305	104,047	128,052
REIGO TRUSTEE LIMITED	124,371	*					•	•	-	*	124,371
MUNDIBIOPHARMA LIMITED		•	•	•	•	*		39,674	36,290	37,576	113,540
SOFY SARL			18,377	29,174	19,149	8,555	8,760	6,016	4,034	-	94,065
MUNDIPHARMA KOREA LTD				•	*	9,700	30,000	17,000	19,625		76,325
MUNDIPHARMA DEUTSCHLAND GMBH & CO K				6,670	12,950	29,650		24,924	-		74,194
ACCARDI SARL		*			*		•	5,393	55,609	10,375	71,377
BOETTI CORP	-				327	12,424	18,851	15,003	12,438	7,838	66,881
BOLDINI CORPORATION	-	*	*	*	*	12,751	18,851	15,003	12,438	7,838	66,881
BULLA SARL	·		7,458	7,697	9,249	11,031	9,821	-	1,908	-	47,164
CLOVIO CORP	-			•	-	8,808	8,850	5,800	4,205	3,975	31,638
HAYEZ CORP					902	6,590	5,870	5,400	5,000	-	25,762
MUNDIPHARMA PTE LIMITED	-				-	2,200	5,740	4,100	8,450		20,490
NITID SARL	+		3,061	1,288	1,066	7,875	4,180	1,597	1,363		20,430
HOKOL S A R L	*				2,345	1,721	9,393	•			13,459
MUNDIPHARMA HOLDING AG	*			*		13,000			-	-	13,000
MUNDIPHARMA PHARMACEUTICALS SDN BHD	*	•		***************************************	-	3,460	3,350	3,270	2,700		12,780
MALTUS CORPORATION	***************************************					700	3,581	2,950	3,450	1,625	12,306
MEXCUS CORPORATION	-					700	3,581	2,950	3,450	1,625	12,306
SONTI SARL	-		*	***************************************	4,171	2,640	2,513	817			10,141
FILTI SARL	*	*	818	3,329	473	523	805	-	327	-	6,275
IREY SARL	-	•	5,106	•	266	196	413		218	-	6,199
BANELA CORPORATION	-	*	*	*	6,000	*	*	-		*	6,000
BAYMOND R SACKLER TR 1B 12231989	-	*	*	-	3,000	-			*	-	3,000
RAYMOND R SACKLER TR 2B 12231989	-	*	*	*	3,000	······································	*	*	*	*	3,000
MUNDIPHARMA PHARMACEUTICALS BV	-		*	*	*	1,600		-	*		1,600
NONTAG SARL	*		80	1,002	133	*	276				1,491
PORTHOS SARL	*.		121	*	4	85		544	543		1,293
SONGOL SARL	*		141	215	87	65	*	*	*		508
CUMULATIVE ROUNDING		(1)	(1)	*	*	1	(1)	(1)	*		(3)
Iotal	\$ 826,107 \$	990,709 \$	970,904 \$	714.841 \$	601.294 \$	549,496 S	387.751 \$	537,728 \$	314,330 \$	246,725 \$	6,139,885

- Annual distribution amounts to Lucien Holdings S.ar.l. and its subsidiaries were included in Purdue's Internal Distribution Analysis and those distributions are recorded in the Purdue's audited financial statements as Investment in Associated Companies for the years ended December 31, 2008 and 2009. The Cash Distribution amounts paid to Lucien Holdings S.ar.l. and its subsidiaries included in this schedule are based on the annual distribution amounts included in Purdue's Internal Distribution Analysis and audited financial statements.
  - o Individual distribution amounts paid to Lucien Holdings S.ar.l. and its subsidiaries were not included in Purdue's Internal Distribution Analysis.
  - o As a result of foreign currency adjustments and unavailability of individual transaction amounts included in Purdue's Internal Distribution Analysis, each individual distribution amount paid to Lucien Holdings S.ar.l. and its subsidiaries could not be identified in Purdue's SAP accounts payable system.
- Raymond R Sackler Trust 1B is the name on the bank account of the trust that owns Linarite Holdings LLC.
- Raymond R Sackler Trust 2B is the name on the bank account of the trust that owns Perthlite Holdings LLC.
- The amounts identified in accounts payable for 2017 include \$246.7 million of cash transfers related to promissory notes issued by PRA L.P. to Purdue, which PRA L.P. then transferred to Ex-US Affiliates. These loans have since been repaid in full with interest.

<sup>&</sup>lt;sup>1</sup> Non-Tax cash transfers include Cash Distributions and loans that Purdue made to PRA L.P. in 2017.

Tax Distributions Identified in Accounts Payable<sup>1</sup> (dollars in thousands)

SAP Payee		2008	20	009	2010		2011	2	012	7	013	2014		2015	100	2016		2017		Total
UNITED STATES TREASURY	\$	520,497	\$ 3	309,504	\$ 289,943	\$	239,175	\$	206,138	\$	164,113 \$	196,15	7 \$	204,573	\$	111,642	\$	49,600	\$ 2	2,291,342
ROSEBAY MEDICAL COMPANY LP		5,879		343,311	304,884		255,570		220,144		192,757	227,60	0	132,708		119,410		71,785		1,874,048
STATE OF NJ		13,260		13,042	12,724		16,889		11,745	Newson.	8,050	8,20	0	6,705		4,050		2,000		96,665
BEACON CO		-		-	-		9,255		12,670		24,990	27,90	8	13,632		4,200		450		93,105
NORTH CAROLINA DEPT OF REVENUE		2,505		9,000	11,957		10,938		9,500		9,271	7,75	0	6,779		6,930		4,500		79,130
BEACON TRUST COMPANY LIMITED		1-1		19,927	27,561		4,302	.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	-		-	-		-		-		-		51,790
CT COMMISSIONER OF REVENUE SERVICES		-			82		451		1		1,223	55	3	1,623		2,490		21,600		28,023
CONNECTICUT COMMISSIONER OF REVENUE		-		13,000	-				-		-	-		-		-		-		13,000
NEW YORK STATE INCOME TAX		4,980		5,039	2,478				-		-	-		-		-		-		12,497
TREASURER STATE OF OHIO				-			4,825		1,830		1,189	1,40	8	1,354		550		100		11,256
RHODE ISLAND DIVN OF TAXATION		2,964		-	-		350		1,075		1,025	3,79	2	1,086		606		40		10,938
CA FRANCHISE TAX BOARD		-		-					-		1,800	3,02	5	2,809		1,455		-		9,089
RI DIV OF TAXATION		4,035		1,663	1,987		420		-		-	-		-		-		-		8,105
GEORGIA DEPARTMENT OF REVENUE		555		634	1,536		900		500		80	47	5	505		425		75		5,685
MICHAEL COSTANZA CPA CLIENT		-		-	483		2,119		1,137		1,460	26	0	-		_		-		5,459
COMPTROLLER OF MARYLAND		697		793	604		453	.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	349		274	31	4	357		283		140		4,264
KENTUCKY STATE TREASURER		-		-	1,005		890		650		588	27	2	149		130		-		3,684
NYC DEPARTMENT OF FINANCE		-		-	1,934		1,150		275		-	7		43		8		-		3,485
ALABAMA DEPT OF REVENUE		592		438	216				400		350	32	5	350		330		100		3,101
MICHIGAN DEPARTMENT OF TREASURY				-	-				695		643	62	5	560		180		-		2,703
ILLINOIS DEPARTMENT OF REVENUE		-		-	463		307		-		-	-		868		700		-		2,338
NYS COMMISSIONER OF TAXATION & FIN		_		-				al trestant to	+			70	1	575		340		135		1,751
MINNESOTA REVENUE		270		275	137				-		-	13	5	379		185		-		1,381
ARIZONA DEPT OF REVENUE		278		318	158		*		*			12	6	148		80		-		1,108
COLORADO DEPTARTMENT OF REVENUE		-		-	-		115		169		105	18	0	97		90		-		756
MAINE REVENUE SERVICES		127		232	39		20		16		15	1	1	11		10		8		489
OHIO DEPARTMENT OF TAXATION				-			-		-		-	-		-		-		380		380
OREGON DEPARTMENT OF REVENUE				-	-		-		30		238		5	22		7		10		312
DELAWARE DIVISION OF REVENUE		46		52	58				-		+	2	3	23		20		-		222
TREASURER STATE OF MAINE	000000000000000000000000000000000000000	2	***********	-	117		_		-			-		-		-		-		119
COMMISSIONER OF REVENUE SERVICES		45		-	-				-		-			-		-		-		45
CUMULATIVE ROUNDING		-		1	(1	)	(1)		(1)		-	(	1)	(3)				-		(6)
Total	\$	556,732	\$ 7	17,229	\$ 658,365	\$	548,128	\$ 4	67,323	\$ 4	108,171 \$	479,919	9 \$	375,353	\$	254,121	\$ :	150,923	\$ 4	4,616,264

Accounts payable activity for the payee Michael Costanza, CPA are payments to various state taxing authorities made on behalf of Beacon Company. Purdue wired funds to Michael Costanza, CPA which would be responsible for remitting the estimated quarterly payments to the appropriate state authorities. We are unable to determine whether payments made to Michael Costanza, CPA were in turn made to the appropriate taxing authorities.

<sup>&</sup>lt;sup>1</sup> We are unable to determine from the books and records maintained by Purdue and Rhodes whether Rosebay Medical Company L.P. or Beacon Company used the distributions to make tax-related payments to the appropriate taxing authorities.

Entity-Level Cash Transfers (Non-Tax Cash Transfers<sup>1</sup> and Tax Distributions<sup>2</sup>) by Year (dollars in thousands); Page 1 of 4

Particle Plante LP (2008)	22,050 2,000 4,500 450 21,600 100	518,6 187,6 111,1 96,6 76,6 39,6 28,6 11,1 9,6 8,7
LUCIEN HOLDINGS SARI, SUBSIDIARIES   76,107   111,576   7,952   16,633   14,690   12,670   10,820   9,850   5,588   6,922   51ATE OR N   12,660   13,042   12,744   16,889   11,745   8,060   8,000   5,000	22,050 2,000 4,500 450 21,600 100 	187,6 111,1 96,6 76,0 53,5 39,6 28,0 11,1 9,6 8,7
LUCIEN HOLDINGS SARL / SUBSIDIARIES 76,107 111,576  ROSPSAM MEDICAL COMPANY ID 7,952 16,633 14,690 12,670 10,820 9,850 9,588 6,922 51AE OR 1 3,260 13,042 12,724 10,889 11,745 8,050 8,200 5,705 4,050 10,870	22,050 2,000 4,500 450 21,600 100 	187,6 111,1 96,6 76,0 53,5 39,6 28,0 11,1 9,6 8,7
ROSEBAM MEDICAL COMPANY IP 13,260 13,642 14,560 12,670 10,820 9,850 9,588 6,922 STATE OF N 13,260 13,042 12,774 (6,889 11,745 8,050 8,200 5,705 4,050 NORTH CAROLINA DEPT OF REVENUE 2,500 9,000 11,266 10,238 9,500 8,871 7,350 5,066 6,750 BEACON TRUST COMPANY LIMITED - 7,052 27,561 4,062 - 9,255 12,670 9,650 9,300 7,975 4,200 BEACON TRUST COMPANY LIMITED - 7,052 27,561 4,062 - 1,200 BEACON ROSE OF REVENUE SERVICES 8 4,00 - 1,20 550 1,613 2,485 1,850 1,80 1,80 1,80 1,80 1,80 1,80 1,80 1,8	2,000 4,500 450 21,600 100  75	111,1 96,6 76,0 53,5 39,6 28,0 11,1 9,0 8,7
SIATE OF N  ORTH CAROLINA DEPT OF REVENUE  2,590 9,000 11,266 10,238 9,500 11,266 10,238 9,500 11,266 10,238 9,500 11,266 10,238 9,500 11,267 9,555 12,670 9,550 9,500 7,975 4,200 12,755 12,670 9,550 9,500 7,975 4,200 12,755 12,670 9,500 1,126 1,1	2,000 4,500 450 21,600 100  75	96,6 76,0 53,5 39,6 28,0 11,1 9,6 8,7
NORTH CAROLINA DEPTI OF REVENUE	4,500 450 21,600 100 	76,0 53,5 39,6 28,0 11,1 9,6 8,7
BRACON CO	450 21,600 100  -75	53,5 39,8 28,0 11,1 9,6 8,7 7,0
BRACON TRUST COMPANY LIMITED   7,952   27,561   4,304   1,207   550   1,613   2,485   1,807   1,199   1,350   1,147   550   1,247   1,247   1,	21,600 100 	39,8 28,0 11,1 9,6 8,7 7,0
CT COMMISSIONER OF REVENUE SERVICES  FIRA SARI  FIRAS	75	28,0 11,1 9,6 8,7 7,0
TREASPREN STATE OF OHIO	75	11,1 9,6 8,7 7,0
Fire SARI	75	9,6 8,7 7,0
IND SARI	75	8,7 7,0
CA FRANCHISE TAX BOARD  GRORGIA DEPARTMENT OF REVENUE  552 634 1,536 900 500 80 475 505 425  NEW YORK STATE INCOME TAX  4,970 325  NEW YORK STATE INCOME TAX  4,970 325  NEW YORK STATE INCOME TAX  4,970 325  NEW YORK STATE INCOME TAX  1,934 1,150 275  NEW YORK STATE INCOME TAX  NEW DEPARTMENT OF FINANCE  1,934 1,150 275  NEW YORK STATE INCOME TAX  NEW DEPARTMENT OF FINANCE  1,934 1,150 275  NEW YORK STATE INCOME TAX  NEW DEPARTMENT OF FINANCE  1,934 1,150 275  NEW YORK STATE INCOME TAX  1,936	75	7,0
GEORGIA DEPARTMENT OF REVENUE	75	
NEW YORK STATE INCOME TAX    1,970		5.6
BULLA SARL  3,996		0,0
NYC DEPARTMENT OF FINANCE  - 1,934 1,150 275		5,7
NYC DEPARTMENT OF FINANCE  - 1,934 1,150 275		3,9
RHODE ISLAND DINN OF TAXATION 692 726 472 350 215 20 170 167 120 NITID SARL 2,981  RIDIV OF TAXATION 2,935  RICHINGRA DEPARTMENT OF TREASURY 3,000  RICHINGRA DEPARTMENT OF TAXATION 3,000  RICHINGRA DEPARTMENT OF TREVENUE 3,000  RICHINGRA DEPARTMENT OF TAXATION 3,000  RICHINGRA DEPARTMENT OF TAXATION 3,000  RICHINGRA DEPARTMENT OF TREVENUE 3,000  RICHINGRA DEPARTME	40	3,3
COMPTROLLER OF MAYLAND 692 726 472 350 215 220 170 167 120 NITLD SARL RI DIV OF TAXATION 2,935 695 643 625 560 180 ALABAMA DEPT OF REVENUE 907 ALABAMA DEPT OF REVENUE 908 120 16 15 11 11 10 10 10 10 10 10 10 10 10 10 10		3,1
NITIO SARL  1, 2,935    NICHIGAN DEPARTMENT OF TREASURY		3,1
RI DIV OF TAXATION 2,935	- 11	2,9
MICHIGAN DEPARTMENT OF TREASURY 695 643 625 560 180 ALABAMA DEPT OF REVENUE 400 350 325 350 330 SOFY SARL 1,683 400 350 325 350 330 SOFY SARL 1,683		2,9
ALABAMA DEPT OF REVENUE		2,7
SOFY SARL	A CONTRACT OF STREET OF STREET, STREET	
ILLINOIS DEPARTMENT OF REVENUE	100	1,8
MAIN REVENUE SERVICES 127 232 39 20 16 15 11 11 10 0 0 10 0 0 10 0 0 PARTMENT OF TAXATION	-	1,6
OHIO DEPARTMENT OF TAXATION  MICHAEL COSTANZA CPA CLIENT  COLORADD DEPTARTMENT OF REVENUE  - 194  - 115  50  - 7  REASURER STATE OF MAINE  107  COMMISSIONER OF REVENUE SERVICES  45  - 17  COMMISSIONER OF REVENUE SERVICES  45  - 17  COMMISSIONER OF REVENUE SERVICES  45  - 17  COMMISSIONER OF REVENUE SERVICES  45  COMMISSIONER OF REVENUE SERVICES  50  COMMISSIONER OF TAXATION SERVICES  50  COMMISSIONER OF TAXAT	-	9
MICHAEL COSTANZA CPA CLIENT COLORADO DEPTARTMENT OF REVENUE	8	
COLORADO DEPTARTMENT OF REVENUE PORTHOS SARL 121 125 126 127 127 128 127 127 128 128 129 129 129 129 129 120 120 121 121 121 121 121 122 123 124 125 125 126 127 127 127 127 127 127 127 127 127 127	380	
PORTHOS SARL  121 TREASURER STATE OF MAINE  COMMISSIONER OF REVENUE SERVICES  45		
TREASURER STATE OF MAINE  COMMISSIONER OF REVENUE SERVICES  45  Furdue Pharma L.P. (208) Total \$ 619,999 \$ 151,439 \$ 102,512 \$ 63,531 \$ 50,566 \$ 42,908 \$ 40,348 \$ 37,436 \$ 27,339 \$  COMMISSIONER OF REVENUE SERVICES  FURDICKY STATE TREASURER  FURDICKY STATE TREASURER  COMMISSIONER OF REVENUE SERVICES  45  COMMISSIONER OF REVENUE SERVICES  COMMISSIONER OF	- 1	1
TREASURER STATE OF MAINE  COMMISSIONER OF REVENUE SERVICES  45		1
REMITICIENT   FRANCING   FRANCI		
REPUTCHY STATE TREASURER	+	
Purdue Pharma L.P. (208) Total \$ 619,999 \$ 151,439 \$ 102,512 \$ 63,531 \$ 50,566 \$ 42,908 \$ 40,348 \$ 37,436 \$ 27,339 \$  overtry Technologies L.P (230)  ROSEBAY MEDICAL COMPANY LP \$ 4,650 \$ 900 \$ 4,105 \$ 13,392 \$ 7,768 \$ 3,943 \$ 21,294 \$ 4,712 \$ 1,983 \$ 1,987 \$ 1,9	*	***************************************
Note	51,303 \$	1,187,3
ROSEBAY MEDICAL COMPANY LP \$ 4,650 \$ 900 \$ 4,105 \$ 13,392 \$ 7,768 \$ 3,943 \$ 21,294 \$ 4,712 \$ 1,983 \$ UNITED STATES TREASURY 4,650 5,83 6,844 825 4,681 3,548 19,222 4,586 2,600	-1	2/24//
ROSEBAY MEDICAL COMPANY LP \$ 4,650 \$ 900 \$ 4,105 \$ 13,392 \$ 7,768 \$ 3,943 \$ 21,294 \$ 4,712 \$ 1,983 \$ UNITED STATES TREASURY 4,650 5,83 6,844 825 4,681 3,548 19,222 4,586 2,600		
UNITED STATES TREASURY 4,650 5,883 6,844 625 4,691 3,548 19,222 4,586 2,600 6EACON CO 12,500 3,000 340 1,843 71 5 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7	. s	62,7
BEACON CO         -         12,500         3,000         340         1,843         71         -           RHODE ISLAND DIVN OF TAXATION         -         -         350         1,075         1,025         3,727         990         581           RI DIV OF TAXATION         1,100         1,663         1,987         420         -         -         -         400         400         713         180           NORTH CAROLINA DEPT OF REVENUE         -         -         400         400         713         180		52,8
RHODE ISLAND DIVN OF TAXATION - 350 1,075 1,025 3,727 990 581 RI DIV OF TAXATION 1,100 1,663 1,987 420 - 400 400 713 180		
RI DIV OF TAXATION 1,100 1,663 1,987 420		17,7
NORTH CAROLINA DEPT OF REVENUE 525 700 - 400 400 713 180	-	7,7
		5,1
MICHAEL COSTANZA CPA CLIENT 65 77 45 20		2,5
	-	
NYS COMMISSIONER OF TAXATION & FIN 136 - 20	-	
NYC DEPARTMENT OF FINANCE 75 43 8	-	
NEW YORK STATE INCOME TAX - 135	-0.0	1000
TREASURER STATE OF OHIO	and the second	
COMPTROLLER OF MARYLAND 3 3 - 18 3	*	
KENTUCKY STATE TREASURER 8 14 2 -		
CT COMMISSIONER OF REVENUE SERVICES 1 1 3 3 10 5	*	
BEACON TRUST COMPANY LIMITED		
Coventry Technologies L.P (230) Total \$ 10,400 \$ 8,446 \$ 13,599 \$ 28,257 \$ 16,612 \$ 9,312 \$ 46,810 \$ 11,134 \$ 5,380 \$		149,5
C DOC/C C PCT/LD C DIOC/C DIOC/		449,3
Subtotal by Page \$ 630,399 \$ 159,885 \$ 116,111 \$ 91,788 \$ 67,178 \$ 52,220 \$ 87,158 \$ 48,570 \$ 32,719 \$	- \$	1,337,3

<sup>&</sup>lt;sup>1</sup> Non-Tax cash transfers include Cash Distributions and loans that Purdue made to PRA L.P. in 2017.

<sup>&</sup>lt;sup>2</sup> We are unable to determine from the books and records maintained by Purdue and Rhodes whether Rosebay Medical Company L.P. or Beacon Company used the distributions to make tax-related payments to the appropriate taxing authorities.

Entity-Level Cash Transfers (Non-Tax Cash Transfers<sup>1</sup> and Tax Distributions<sup>2</sup>) by Year (dollars in thousands);

EAR POLICE		2025	2000	2010	Page 2	2012	2012	2024	2010	2016	2012	- P. W. L.
SAP Entity		2008	2009	7010	2011	2012	2013	2014	2015	2016	2017	Total
New Suffolk Holdings LLP (232) MUNDIPHARMA DIUTSCHLAND GMBH & GO K.	5				5,670 5	12,950 \$	29,650 \$	Š	24,974 \$		\$	78.70
New Suffolk Holdings LLP (232) Total	5		. 4	- 5	6,670 \$	12,950 \$	29,650 \$	- 5	24,924 5	- 5	- 5	74,19
New Suffolk Holdings LLP (232) Total	3	. >	- 5	- 1	6,670 5	12,950 5	29,650 \$	: 3:	74,974 5	+ 5	- )	74,19
Lucien Holdings S.ar. I. (233)												
IND SARL	5	- 5	- 5	- 5	- \$	4,463 \$	- \$	- \$	- \$	- \$	. 5	4,46
HAYEZ CORP						902		2,000				2,90
MALTUS CORPORATION								1.250				1,25
CLOVIO CORP								1,700	-			1,20
HOKOL 5 A R L						1,111						1,11
BOETTI CORP							750					75
BOLDINI CORPORATION			***************************************			***************************************	750	***************************************	***************************************			75
Lucien Holdings S.ar. I. (233) Total	5	- 5	- 5	- \$	\$	6,476 \$	1,500 \$	4,450 5	- \$	- 5	- 5	12,42
all the action of the many												
Purdue Pharma Inc. (301)	*		4			2 000		-				(4, 44
BANFIA CORPORATION	5	3				3,000 S 1,500	3	- S	3		- 5	3,00
RAYMOND R SACKIER TR 18 12231989												1,50
RAYMOND R SACKLER TR 2B 12231989						1,500		-				1,50
Purdue Pharma Inc. (301) Total	5	- \$	- 5	\$	\$	5,000 \$	- \$	\$	- \$	- \$	- \$	6,00
Avrio Health L.P. (307)												
NEW YORK STATE INCOME TAX	5	10 \$	- 5	- 5	- 5	. \$	- 5	- 5	- 5	- 5	. 5	1
NORTH CAROLINA DEPT OF REVENUE												
COMPTROLLER OF MARYLAND		5										
GEORGIA DEPARTMENT OF REVENUE		7										
TREASURER STATE OF MAINE												
Avrio Health L.P. (307) Total	5	25 \$	- 5	5	- 3	5	- 5	S	- 5		5	2
AVIOTRAILITET (507) TOTAL	-	23 3	-	3		*	*	- 4	,	,		
PLP Assoc Holdings L.P. (401)												
ROSEBAY MEDICAL COMPANY LP	\$	376,229 5	774,026 \$	584,475 \$	65,044 \$	\$	- 5	, s	. 5	\$	\$	1,799,77
REACON TRUST COMPANY LIMITED		250,629	436,671									687,30
UNITED STATES TREASURY			303,620	280,285	64,100							648,00
BEACON CO			14,871	300,330								315,20
REIGO TRUSTEE LIMITED		124,371	-			Account of Theory Prince						124,37
CONNECTICUT COMMISSIONER OF REVENUE			13,000	+			-	-	-	-	4	13,00
NEW YORK STATE INCOME TAX			4,714	2,343								7,05
MICHAEL COSTANZA CPA CLIENT		and the second second		483	790	Courted Conservation Theory and research				entrantico de la composición	Construction of the Samuel	1,27
ALABAMA DEPT OF REVENUE		592	438	216	*	******************************	-	-	-		4	1,24
KENTUCKY STATE TREASURER				1,005								1,00
ARIZONA DEPT OF REVENUE		278	318	158								75
MINNESOTA REVENUE	121474-01410-254721411	270	275	137		*	-	-	-		4	68
ILLINOIS DEPARTMENT OF REVENUE				228								72
DELAWARE DIVISION OF REVENUE		46	52	58								15
NORTH CAROLINA DEPT OF REVENUE			*	146		*	-		_			14
COMPTROLLER OF MARYLAND			67			11-11-12					101111111111111111111111111111111111111	6
PLP Assoc Holdings L.P. (401) Fotal	5	752,415 \$	1,548,052 \$	1,169,865 \$	129,934 \$	- \$	- \$	- \$	- 5		- \$	3,600,26
PtP Assoc Holdings Inc. (402)	4	1/2				2222			100	100	(0)	proces
RANELA CORPORATION			\$	- S	\$.	3,000 \$	- \$	- S	- S	- 5	. \$	3,00
RAYMOND R SACKLER TR 1B 12231989						1,500						1,50
RAYMOND R SACKLER TRIZE 12231989	-		-			1,500			-			1,50
PLP Assoc Holdings Inc. (402) Total	5	- 5	- \$	- 5	\$	6,000 \$	- \$	- \$	- \$	- \$	- 5	6,00
RSI Company L.P. (408)												
MUNDIPHARMA KK	5	- 5	- 5	32,869 \$	1,058 \$	- \$	8,379 \$	5,492 \$	21,860 \$	36,008 \$	26,703 \$	132,36
ROSEBAY MEDICAL COMPANY LP				11, 2079611.50	and the second	447					- 100 CO	44
UNITED STATES TREASURY					101-11-11-	447				-		44
	7.5		- 5	32,869 \$	1,058 \$	894 5	8,379 5	5,492 \$	21,860 \$	36,008 \$	26,703 \$	133,26
RSJ Company L.P. (408) Total	5.	+ 5	- 3									
	5	752,440 \$	1,548,052 \$	1,202,734 \$	137,662 \$	32,320 5	39,529 \$	9,942 \$	46,784 5	36,008 \$	26,703 5	3,832,17

<sup>-</sup> Raymond R Sackler Trust 1B is the name on the bank account of the trust that owns Linarite Holdings LLC.

<sup>-</sup> Raymond R Sackler Trust 2B is the name on the bank account of the trust that owns Perthlite Holdings LLC.

<sup>&</sup>lt;sup>1</sup> Non-Tax cash transfers include Cash Distributions and loans that Purdue made to PRA L.P. in 2017.

<sup>&</sup>lt;sup>2</sup> We are unable to determine from the books and records maintained by Purdue and Rhodes whether Rosebay Medical Company L.P. or Beacon Company used the distributions to make tax-related payments to the appropriate taxing authorities.

Entity-Level Cash Transfers (Non-Tax Cash Transfers<sup>1</sup> and Tax Distributions<sup>2</sup>) by Year (dollars in thousands); Page 3 of 4

SAP Entity		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
R Holdings Assoc. LP (413)				u Torrestones in	No.	all residences are a		Treatment of	terrorisa de la constanta de l	1000-00-0	The second	
ROSEBAY MEDICAL COMPANY LP	\$	- 5	- \$	130,768 \$	462,296 \$	432,709 \$	337,373 \$	285,131 \$	272,695 \$	148,147 s	51,218 \$	2,120,33
BEACON CO		-		130,768	287,376	230,450	174,464	105,440	159,604	37,643	1,483	1,127,22
UNITED STATES TREASURY		-		_	174,250	201,000	160,565	176,935	199,986	109,042	49,600	1,071,37
MICHAEL COSTANZA CPA CLIENT			*	-	1,070	1,060	1,415	240	-			3,78
KENTUCKY STATE TREASURER					890	650	580	256	147	130		2,653
CA FRANCHISE TAX BOARD		*						950	694	430		2,074
NYS COMMISSIONER OF TAXATION & FIN							_	565	575	320	135	1,595
ILLINOIS DEPARTMENT OF REVENUE		+		-	153			-	530	432		1,11!
MINNESOTA REVENUE		***************************************		_				135	379	185		699
COLORADO DEPTARTMENT OF REVENUE						119	105	180	97	90		59:
ARIZONA DEPT OF REVENUE							-	126	148	80		354
OREGON DEPARTMENT OF REVENUE		-				30	238	5	22	3	10	312
DELAWARE DIVISION OF REVENUE				***************************************			Z30	23	23	20		56
BR Holdings Assoc. LP (413) Total	\$	- \$		261,536 \$	926,035 \$	866,018 \$	674,740 s	569,986 \$	634,900 \$	296,526 \$	102,446 \$	4,332,187
BR Holdings Assoc. LP (413) Total	3	- 3		201,530 \$	920,035 \$	800,018 \$	6/4,/40 \$	202,380 3	\$ 034,900 \$	290,520 \$	102,446 3	4,332,187
Pharmaceutical Research A (416)												
IND SARL	\$	- 5		12,069 \$	38,622 \$	37,616 \$	51,082 \$	23,988 5	6,441 \$	- 5	- 5	169,818
FLIRA SARL				10,220	24,955	28,155	35,942	16,801	6,635	6,324		129,032
MUNDIPHARMA SINGAPORE		•					*		11,700	12,305	104,047	128,052
LUCIEN HOLDINGS SARL					1,104	1.042	890	29,286	31,348	11,359	42,157	117,186
SOFY SARL				16,694	29,174	19,149	8,555	8,760	6,016	4,034		92,382
MUNDIPHARMA KOREA LTD		*	***************************************		Alleria de la constante de la		9,700	30,000	17,000	19,625		76,325
ACCARDI SARL								30,000	5,393	55,609	10,375	71,377
BOETTI CORP						327	11,674	18,851	15,003	12,438	7,838	66,131
BOLDINI CORPORATION		*		-			12,001	18,851	15,003	12,438	7,838	66,131
BULLA SARL				3,551	7,697	9,249	11,031	9,821	13,003	1,908	/1030	43,257
CLOVIO CORP				3,331	7,037	3,249	8,808	7,650	5,800	4,205	3,975	30,438
HAYEZ CORP						- Harden Simonius	6,590				3,973	
								3,870	6,400	6,000		22,860
MUNDIPHARMA PTE LIMITED		***************************************					2,200	5,740	4,100	8,450		20,490
NITID SARL				80	1,288	1,066	7,875	4,180	1,597	1,363		17,449
MUNDIPHARMA HOLDING AG							13,000					13,000
MUNDIPHARMA PHARMACEUTICALS SDN BHD							3,460	3,350	3,270	2,700		12,780
HOKOL S A R L						1,235	1,721	9,393				12,349
MEXCUS CORPORATION							700	3,581	2,950	3,450	1,625	12,306
MALTUS CORPORATION							700	2,331	2,950	3,450	1,625	11,056
SONTI SARL						4,171	2,640	2,513	817		- 1	10,141
FILTI SARL				818	3,329	473	523	805		327		6,275
IREY SARL				5,106		266	196	413		218		6,199
MUNDIPHARMA PHARMACEUTICALS BV							1,600		-	and the state of t	-	1,600
NONTAG SARL				80	1,002	133		276				1,491
PORTHOS SARL		-		-	*	-	85		544	543		1,172
SONGOL SARL		-		141	215	87	65	1		-	7	508
ROSEBAY MEDICAL COMPANY LP		-	-			-	85	-	-	-	-	85
Pharmaceutical Research A (416) Total	\$	- \$	- 5	48,759 \$	107,386 \$	102,969 \$	191,123 \$	200,460 \$	142,967 \$	166,746 \$	179,480 \$	1,139,890
	-											
Subtotal by Page	\$	- \$	- 5	310,295 \$	1,033,421 \$	968,987 \$	865,863 \$	770,446 \$	777,867 \$	463,272 \$	281,926 \$	5,472,077

<sup>&</sup>lt;sup>1</sup> Non-Tax cash transfers include Cash Distributions and loans that Purdue made to PRA L.P. in 2017.

<sup>&</sup>lt;sup>2</sup> We are unable to determine from the books and records maintained by Purdue and Rhodes whether Rosebay Medical Company L.P. or Beacon Company used the distributions to make tax-related payments to the appropriate taxing authorities.

Entity-Level Cash Transfers (Non-Tax Cash Transfers<sup>1</sup> and Tax Distributions<sup>2</sup>) by Year (dollars in thousands); Page 4 of 4

SAP Entity		2008	- 1	2009			2010		2011		2012		2013	2014	3	2015	2016	2017	Total
Purdue BioPharma L.P. (420)																			77 1.7
MUNDIBIOPHARMA LIMITED	\$		\$		+	5		\$		5	+ 5	5	- \$		\$	39,674 \$	36,290 \$	37,576 \$	113,540
Purdue BioPharma L.P. (420) Total	\$		\$			\$		\$	194	\$	₹	\$	- \$		\$	39,674 \$	36,290 \$	37,576 \$	113,540
SVC Pharma L.P. (507)							129												
COMPTROLLER OF MARYLAND	>		- >		*	>			100		134	>	54 \$	12		190 \$	160 \$	140 \$	1,033
SVC Pharma L.P. (507) Total	\$	-	\$		*	\$	129	\$	100	\$	134	5	54 \$	12	6 \$	190 \$	160 \$	140 \$	1,033
Subtotal by Page	\$		\$		4	\$	129	\$	100	\$	134	ŝ	54 \$	12	6 \$	39,864 \$	36,450 \$	37,716 \$	114,573
CUMULATIVE ROUNDING			0		1			2		2	-2		1		-2	-4	2	0	-6
Total Distributions Identified (all entities)	\$	1,382,8	39 \$	1,70	7,938	\$	1,629,269	\$	1,262,969	\$	1,068,617	\$	957,667 \$	867,67	0 \$	913,081 \$	568,451 \$	397,648 \$	10,756,149

- In situations where a single distribution listed in Purdue's Internal Distribution Analysis contains multiple accounts payable payments to different payees, and a foreign exchange ("F/X") adjustment, then the F/X adjustment was prorated based on each payee's individual payment amount as a percentage of the total distribution. The adjustment was added to the total distributions paid to the payee.
- For the schedules above, rounding errors are corrected at the total level and not at the individual payor subtotal level. Therefore, while the total distributions identified agrees with the summary schedules, there may be differences due to rounding when adding amounts to the individual payees and comparing those amounts to the summary schedules.
- Annual distribution amounts to Lucien Holdings S.ar.l. and its subsidiaries were included in Purdue's Internal Distribution Analysis and those distributions are recorded in the Purdue's audited financial statements as Investment in Associated Companies for the years ended December 31, 2008 and 2009. The Cash Distribution amounts paid to Lucien Holdings S.ar.l. and its subsidiaries included in this schedule are based on the annual distribution amounts included in Purdue's Internal Distribution Analysis and audited financial statements.
  - o Individual distribution amounts paid to Lucien Holdings S.ar.l. and its subsidiaries were not included in Purdue's Internal Distribution Analysis.
  - As a result of foreign currency adjustments and unavailability of individual transaction amounts included in Purdue's Internal Distribution Analysis, each
    individual distribution amount paid to Lucien Holdings S.ar.l. and its subsidiaries could not be identified in Purdue's SAP accounts payable system.
- The amounts identified in accounts payable for 2017 include \$246.7 million of cash transfers related to promissory notes issued by PRA L.P. to Purdue, which PRA L.P. then transferred to Ex-US Affiliates. These loans have since been repaid in full with interest.

<sup>&</sup>lt;sup>1</sup> Non-Tax cash transfers include Cash Distributions and loans that Purdue made to PRA L.P. in 2017.

<sup>&</sup>lt;sup>2</sup> We are unable to determine from the books and records maintained by Purdue and Rhodes whether Rosebay Medical Company L.P. or Beacon Company used the distributions to make tax-related payments to the appropriate taxing authorities.

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# Exhibit D – Rhodes Detailed Schedules of Cash Distributions

#### Exhibit D - Rhodes Detailed Schedules of Cash Distributions

Non-Tax Cash Distributions Identified in Accounts Payable<sup>1</sup> (dollars in '000s)

SAP Payee	:	2008	20	009	2	010	2011	2012	2	013	2	014	2	2015	2	2016	2	017	Total
BEACON CO	\$	-	\$	-	\$	-	\$ 12,500	\$ 3,000	\$	-	\$	-	\$	-	\$	-	\$	-	\$ 15,500
ROSEBAY MEDICAL COMPANY LP		-		-		-	 12,500	 3,000		-		-		-		-		-	15,500
Total	\$	-	\$	-	\$	-	\$ 25,000	\$ 6,000	\$	-	\$	-	\$	-	\$	-	\$	-	\$ 31,000

#### Tax Distributions Identified in Accounts Payable<sup>1</sup> (dollars in '000s)

SAP Payee		2008	2009	2010	2011	2012	2013	2014	2015	2016	:	2017	Total
UNITED STATES TREASURY	\$	4,650	\$ 5,883	\$ 6,844	\$ 825	\$ 4,691	\$ 3,548	\$ 19,222	\$ 4,586	\$ 2,600	\$	-	\$ 52,849
ROSEBAY MEDICAL COMPANY LP		4,650	 900	 4,105	892	 4,768	3,943	 21,294	 4,712	1,983		-	47,247
RHODE ISLAND DIVN OF TAXATION		-	 -	 -	 350	 1,075	 1,025	 3,727	 990	 581		-	7,748
RI DIV OF TAXATION		1,100	 1,663	 1,987	 420	 -	 -	 -	 -	 -		-	5,170
NORTH CAROLINA DEPT OF REVENUE		-	 -	 754	700	 -	 400	 400	 713	 180		-	3,147
BEACON CO		-	 -	 -	 -	 -	 340	 1,843	 71	 -		-	2,254
COMPTROLLER OF MARYLAND		-	 -	 132	 103	 134	 54	 149	 190	 163		140	1,065
MICHAEL COSTANZA CPA CLIENT		-	 -	 -	 65	 77	 45	 20	 -	 -		-	207
NYS COMMISSIONER OF TAXATION & FIN		-	 -	 -	-	 -	-	 136	 -	20		-	156
NEW YORK STATE INCOME TAX		-	 -	 135	 -	 -	 -	 -	 -	 -		-	135
NYC DEPARTMENT OF FINANCE		-	 -	 -	 -	 -	 -	 75	 43	 8		-	126
TREASURER STATE OF OHIO		-	 -	 -	 -	 -	 -	 58	 7	 -		-	65
KENTUCKY STATE TREASURER		-	 -	 -	 -	 -	 8	 16	 2	 -		-	26
CT COMMISSIONER OF REVENUE SERVICE		-	 -	 -	 1	 1	 3	 3	 10	 5		-	23
BEACON TRUST COMPANY LIMITED		-	 -	 _	 1	 -	 -	 _	 -	 -		-	1
CUMULATIVE ROUNDING		-	 -	 -	 (1)	 (1)	 -	 (1)	 (1)	 -		-	(4)
Total	\$	10,400	\$ 8,446	\$ 13,957	\$ 3,356	\$ 10,745	\$ 9,366	\$ 46,942	\$ 11,323	\$ 5,540	\$	140	\$ 120,215

Rhodes Total Distributions	\$ 10,400	\$ 8,446	\$ 13,957	\$ 28,356	\$ 16,745	\$ 9,366	\$ 46,942	\$ 11,323	\$ 5,540	\$ 140	\$ 151,215

- Accounts payable activity for the payee Michael Costanza, CPA are payments to various state taxing authorities made on behalf of Beacon Company. Purdue wired funds to Michael Costanza, CPA which would be responsible for remitting the estimated quarterly payments to the appropriate state authorities. We are unable to determine whether payments made to Michael Costanza, CPA were in turn made to the appropriate taxing authorities.

<sup>&</sup>lt;sup>1</sup> The classification of Tax and Non-Tax Distributions is based on Purdue's and Rhode's Internal Distribution Analysis and the October 19, 2018 MDL Presentation. We are unable to determine from the books and records maintained by Purdue and Rhodes whether Rosebay Medical Company L.P. or Beacon Company used the distributions to make tax-related payments to the appropriate taxing authorities.

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# Exhibit E – Purdue Cash Distributions Tracing Analysis

#### Purdue Cash Distributions Tracing Analysis - Objective and Procedures Performed

#### **Objective**

1. Trace Purdue Cash Distributions and loans Purdue made to PRA L.P. identified in Purdue's SAP accounts payable ledger to available third-party bank statements in order to validate if the distributions amounts, posting/transaction dates, payee/beneficiary names and payor entities were consistent and/or similar in both sources of information.

#### **Procedures Performed**

- 1. Determined time period and entities to review based on Purdue's Internal Distribution Analysis and our reconciliation work. Bank statements were available for July 2014 onwards unless specifically requested from storage by TXP.
- 2. Reviewed bank statements to determine account holder entity name and time period represented.
- 3. Each Purdue Cash Distribution and loan made to PRA L.P. identified in Purdue's SAP accounts payable ledger was compared to the available bank statements to find a match by payor, payee name, posting/transaction date and amount.
- 4. Certain transactions were assumed to be matches even if certain criteria were not an exact match. For example, if a distribution amount matched, but the payee name was not included in the bank statement and the posting date was within 60 days (before or after) of the transaction date included on the bank statement, then the distribution was generally considered to be a match.
  - If any of the criteria were not a match, the discrepancy was noted.
  - For payee name mismatches, the most common reason was that the bank statement did not include a payee name.
  - Certain F/X transactions to multiple payees were grouped together into a single transaction on the bank statement. It is unclear from the bank statements who the actual payment recipients were but have been considered matches. We noted variations in the dollar amounts for F/X transactions on the bank statements but assumed that those transactions were matches.

#### Purdue Cash Distributions Tracing Analysis – Sources Relied Upon

The following types of sources of information were accessed and reviewed from Purdue and TXP:

- 1. Cash Distributions and loans made to PRA L.P. identified in Purdue's SAP accounts payable ledger;
- 2. Bank statements for Purdue and Affiliated Entities from the below periods highlighted in green; and
- 3. Bank account check clearing reconciliations.

Purdue Phar	ma	, L.	Р.	(Co	omį	pan	ıy ŧ	#2C	18)			
	<u>Ba</u>	<u>nk</u>	St	ate	<u>me</u>	nt	Per	riod	<u>ls F</u>	lec	<u>eiv</u>	<u>ed</u>
		Q1			Q2			Q3		-	Q4	
Year	J	F	М	Α	М	J	J	A	S	0	N	D
2011												
2012												
2013												
2014												
2015												
2016												
2017												
2018												

<b>New Suffolk</b>												
	<u>Ba</u>	nk	St	ate	me	nt	Per	riod	<u> s </u>	lec	<u>eiv</u>	<u>ed</u>
		Q1			Q2			Q3			Q4	
Year	J	F	М	A	М	J	J	Α	S	0	N	D
2011												
2012												
2013												
2014												
2015												
2016												
2017												
2018												

Norwell Lan												
	Ba	<u>ınk</u>	St	<u>ate</u>	<u>me</u>	nt	Pei	rioc	<b>s</b> I	lec	<u>eiv</u>	ed
		Q1			Q2			Q3			Q4	
Year	J	F	М	Α	М	J	J	Α	S	0	N	D
2011												
2012												
2013												
2014												
2015												
2016												
2017												
2018												

PLP Holding				
	Bank St	atement	<u>Periods I</u>	Received
	Q1	Q2	Q3	Q4
Year	J F M	A M J	JAS	OND
2011				
2012				
2013				
2014				
2015				
2016				
2017				
2018				

RSJ Compan										lec	eiv	ed	
		Q1			02			Q3			Q4		
Year	J	F	М	Α	М	J	J	Α	S	0	N	D	
2011													
2012													
2013													
2014													
2015													
2016													
2017													
2018													

BR Holdings		Associates, L.P. (Company #413) Bank Statement Periods Received											
		Q1			02			Q3			Q4		
Year	J	F	М	Α	М	J	J	Α	S	0	N	D	
2011													
2012													
2013													
2014													
2015													
2016													
2017													
2018													

	Q1	Q2	Q3	Q4		
Year	J F M	A M J	JAS	O N		
2011						
2012						
2013						
2014						
2015						
2016						
2017						
2018						

Purdue BioPharma, L.P. (Company #420)  Bank Statement Periods Received												
	<u>Ba</u>	ınk	St	ate	me	nt	Per	riod	<b>5</b>	lec	<u>eiv</u>	<u>ed</u>
		Q1 Q2			Q3			Q4				
Year	J	F	М	A	М	J	J	Α	S	0	N	D
2011												
2012												
2013												
2014												
2015												
2016												
2017												
2018												

Based upon on the tracing work performed on the Purdue Cash Distributions and loans Purdue made to PRA L.P. recorded in the SAP accounts payable ledger to the available third-party bank statements, we have the following observations:

1. The available third-party bank statements included 666 transactions totaling \$3.63 billion, of which matches between the two sources of information (SAP accounts payable ledger and Bank Statements) were identified for 666 transactions (100% of total) totaling \$3.63 billion (100% of total).

	Payable	e Le	s in SAP Accounts dger within Bank nent Periods	Transactions in SAP Account Payable Ledger Matched to Bank Statements				
Company Name (Company #)	# Trx		\$ Amount	# Trx		\$ Amount		
BR Holdings Associates, L.P. (Company #413)	283	\$	2,385,587,755	283	\$	2,385,587,755		
Purdue Pharma, L.P. (Company #208)	108	\$	161,482,742	108	\$	161,482,742		
Purdue Holdings, L.P. (Company #416)	249	\$	842,234,885	249	\$	842,273,255		
RSJ Company, L.P. (Company #408)	19	\$	100,069,310	19	\$	100,069,310		
Purdue BioPharma, L.P. (Company #420)	6	\$	113,607,063	6	\$	113,540,042		
New Suffolk Holding, L.P. (Company #232)	1	\$	24,924,360	1	\$	24,924,360		
PLP Holdings Associates L.P. (Company #401)	_	\$	-	_	\$	-		
BR Holdings Associates, Inc. (Company #414)	_	\$	-	_	\$	-		
	666	\$	3,627,906,115	666	\$	3,627,877,464		
As % of Transactions within Bank Statement periods	100%		100%	100%		100%		

Note: \$ Amount differences above are due to variations in F/X transaction amounts recorded in the accounts payable ledger and bank statements. For purposes of the Purdue Cash Distributions tracing analysis, we have assumed that these Cash Distributions are matched transactions.

- The payor entity/company name listed above represents the last entity (not always Purdue) making a distribution whose books and records are maintained in the same SAP accounting system as Purdue. The intermediate transfers passed through the Affiliated Entities whose books and records are maintained in the same SAP accounting system as Purdue are usually recorded by general ledger entry and not through accounts payable.

<sup>1</sup> SAP accounts payable ledger posting date considered a match if within +/- 60 days of bank statement transaction date.

2. For BR Holdings Associates L.P. (Entity #413):

Periods for which statements are available:	Apr. 2011 – Jun. 2011 & Jun. 2013 – Dec. 2018
Number of transactions in SAP account payable ledger within available bank statement periods:	283 - \$2.39b
Number of transactions matched to bank statements (and as % of total for available statement periods):	283 <i>(100%)</i> – \$2.39b <i>(100%)</i>
Number of exact matches (payee, amount and date):	76 – \$454.34m
Number of payee and amount matches with close posting date match: <sup>1</sup>	112 - \$1.85b
Number of amount matches with close posting date	95 – \$82.27m
match <sup>1</sup> (no payee name listed in bank statement):	<ul> <li>70 checks totaling \$5.82m, all appear to be tax payments</li> </ul>
	<ul> <li>17 payments to Rosebay Medical Company LP totaling \$59.35m</li> </ul>
	<ul> <li>8 payments to Beacon Co. totaling \$17.1m</li> </ul>

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3. For Purdue Pharma, L.P. (Entity #208):

Periods for which statements are available:	Aug. 2014 - Dec. 2018
Number of transactions in SAP account payable ledger within available bank statement periods:	108 - \$161.48m
Number of transactions matched to bank statements (and as % of total for available statement periods):	108 <i>(100%)</i> – \$161.48m <i>(100%)</i>
Number of exact matches (payee, amount and date):	20 – \$51.31m
Number of payee and amount matches with close posting date match: <sup>1</sup>	39 - \$79.81m
Number of amount matches with close posting date match <sup>1</sup>	49 – \$30.36m
(no payee name listed in bank statement):	• 2 payments to North Carolina Dept of Revenue totaling \$12.82m
	<ul> <li>4 payments to Rosebay Medical Company LP totaling \$5.76m</li> </ul>
	<ul> <li>3 payments to Beacon Co totaling \$4.15m</li> </ul>
	<ul> <li>10 payments to Treasurer State of Ohio totaling \$2.82m</li> </ul>
	<ul> <li>3 payments to State of NJ totaling \$2.23m</li> </ul>
	• 6 payments to Michigan Department of Treasury totaling \$1.17m
	• 2 payments to Illinois Department of Revenue totaling \$605k
	9 payments to Comptroller of Maryland totaling \$397k
	3 payments to Ohio Department of Taxation totaling \$380k
	7 payments to Maine Revenue Services totaling \$34k

<sup>&</sup>lt;sup>1</sup> SAP accounts payable ledger posting date considered a match if within +/- 60 days of bank statement transaction date.

4. For Purdue Holdings L.P. (Entity #416):

Periods for which statements are available:	Apr. 2011 - Jun. 2011 & Jun. 2013 - Dec. 2018				
Number of transactions in SAP account payable ledger within available bank statement periods:	249 – \$842.23m				
Number of transactions matched to bank statements (and as % of total for available statement periods):	249 (100%) - \$842.27m (100% – difference due to variations in F/X transaction amounts as explained below)				
Number of exact matches (payee, amount and date):	18 - \$144.35m				
Number of F/X transactions with close amount and posting	10 – \$47.29m				
date matches <sup>1</sup> (no payee name listed in bank statement) – slight amount differences are likely due to F/X rate	<ul> <li>All are F/X transactions (USD to EUR)</li> </ul>				
changes and/or fees:	<ul> <li>6 payments to Lucien Holdings S.ar.I. totaling \$34.34m in SAP vs. \$34.28m in bank statements</li> </ul>				
	<ul> <li>3 payments to Accardi S.ar.l. totaling \$9.69m in SAP vs. \$9.78m in bank statements</li> </ul>				
	<ul> <li>1 payment to Flira S.ar.l. totaling \$3.227m in SAP vs.</li> <li>\$3.228m in bank statement</li> </ul>				
Number of payee and amount matches with close posting date match:1	57 – \$159.15m				

<sup>&</sup>lt;sup>1</sup> SAP accounts payable ledger posting date considered a match if within +/- 60 days of bank statement transaction date.

4. For Purdue Holdings L.P. (Entity #416), continued:

Number of amount matches with close posting date match<sup>1</sup> (no payee name listed in bank statement):

164 - \$491.48m

- 52 payments to various foreign entities appear to have been bundled into 13 payments totaling \$223.11m
- 112 payments to various entities totaling \$268.37m
  - 16 payments to Lucien Holdings S.ar.l. totaling \$70.64m
  - 14 payments to Accardi S.ar.l. totaling \$40.49m
  - 15 payments to Boetti Corp totaling \$40.88m
  - 15 payments to Boldini Corporation totaling \$40.88m
  - 12 payments to Clovio Corp totaling \$15.56m
  - 8 payments to Hayez Corp totaling \$12.4m
  - 10 payments to Mexcus Corporation totaling \$9.26m
  - 9 payments to Maltus Corporation totaling \$8.01m
  - 2 payments to Hokol S.ar.l. totaling \$8.02m
  - 1 payment to Sofy S.ar.l. totaling \$6.99m
  - 1 payments to Flira S.ar.l. totaling \$3.41m
  - 3 payments to Mundipharma Pte Limited totaling \$4.2m
  - 2 payments to Mundipharma Pharmaceuticals Sdn Bhd totaling \$3.56m
  - 1 payment to Ind S.ar.l. totaling \$2.18m
  - 2 payments to Porthos S.ar.l. totaling \$1.09m
  - 1 payment to Sonti S.ar.l. totaling \$817k

<sup>&</sup>lt;sup>1</sup> SAP accounts payable ledger posting date considered a match if within +/- 60 days of bank statement transaction date.

5. For RSJ Company, L.P. (Entity #408):

Periods for which statements are available:	Jul. 2014 - Dec. 2018
Number of transactions in SAP account payable ledger within available bank statement periods:	19 - \$100.07m
Number of transactions matched to bank statements (and as % of total for available statement periods):	19 <i>(100%)</i> – \$100.07m <i>(100%)</i>
Number of exact matches (payee, amount and date):	6 - \$21.93m
Number of payee and amount matches with close posting date match: <sup>1</sup>	13 - \$78.14m
Number of amount matches with close posting date match <sup>1</sup> (no payee name listed in bank statement):	0

<sup>&</sup>lt;sup>1</sup> SAP accounts payable ledger posting date considered a match if within +/- 60 days of bank statement transaction date.

6. For Purdue BioPharma L.P. (Entity #420):

Periods for which statements are available:	May. 2015 - Dec. 2017				
Number of transactions in SAP account payable ledger within available bank statement periods:	6 - \$113.61m				
Number of transactions matched to bank statements (and as % of total for available statement periods):	6 (100%) - \$113.54m (99.9% – difference due to variations in F/X transaction amounts as explained below)				
Number of exact matches (payee, amount and date):	0				
Number of F/X transactions with close amount and posting	2 – \$37.58m				
date matches <sup>1</sup> (no payee name listed in bank statement) – slight amount differences are likely due to F/X rate	<ul> <li>Both are F/X transactions (USD to EUR)</li> </ul>				
changes and/or fees:	<ul> <li>Payment to Mundibiopharma Limited of \$11.22m in SAP vs. \$11.17m in bank statement</li> </ul>				
	<ul> <li>Payment to Mundibiopharma Limited of \$26.43m in SAP vs.</li> <li>\$26.41m in bank statement</li> </ul>				
Number of payee and amount matches with close posting date match: <sup>1</sup>	0				
Number of amount matches with close posting date match <sup>1</sup>	4 – \$75.96m				
(no payee name listed in bank statement):	<ul> <li>4 payments to Mundibiopharma Limited totaling \$75.96m</li> </ul>				

<sup>&</sup>lt;sup>1</sup> SAP accounts payable ledger posting date considered a match if within +/- 60 days of bank statement transaction date.

7. For New Suffolk Holding, L.P. (Entity #232):

Periods for which statements are available:	Jan. 2015 - Dec. 2015				
Number of transactions in SAP account payable ledger within available bank statement periods:	1 – \$24.92m				
Number of transactions matched to bank statements (and as % of total for available statement periods):	1 <i>(100%)</i> – \$24.92m <i>(100%)</i>				
Number of exact matches (payee, amount and date):	0				
Number of payee and amount matches with close posting date match: <sup>1</sup>	0				
Number of amount matches with close posting date match <sup>1</sup>	1 – \$24.92m				
(no payee name listed in bank statement):	• \$24.92m to Mundipharma Deutschland GmbH & Co K				

<sup>&</sup>lt;sup>1</sup> SAP accounts payable ledger posting date considered a match if within +/- 60 days of bank statement transaction date.

8. For PLP Holdings Associates L.P. (Entity #401):

Periods for which statements are available:	Aug. 2014 - [	Dec. 2018
Number of transactions in SAP account payable ledger within available bank statement periods:	0	
Number of transactions matched to bank statements:	0	Transactions in SAP account payable
Number of exact matches (payee, amount and date):	n/a	ledger spanned the period from Jan. 2008 - Apr. 2011 • No bank statements from these periods
Number of payee and amount matches with close posting date match:	n/a	were available for review
Number of amount matches with close posting date match (no payee name listed in bank statement):	n/a	

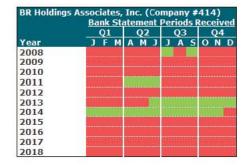
9. For BR Holdings Associates, Inc. (Entity #414):

Periods for which statements are available:	Jul. 2008, Sep. 2008, Apr. 2011 - Jun. 2011 & Jun. 2013 - Nov. 2014
Number of transactions in SAP account payable ledger within available bank statement periods:	0
Number of transactions matched to bank statements:	0
Number of exact matches (payee, amount and date):	n/a
Number of payee and amount matches with close posting date match:1	n/a
Number of amount matches with close posting date match (no payee name listed in bank statement):	n/a

10. Statements have not yet been analyzed for the following entities listed in the SAP account payable ledger:



- 11. Statements for the following entities were provided, but no transactions were recorded in the SAP accounts payable ledger:
  - · BR Holdings Associates Inc.



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# **Purdue Cash Distributions Flow of Funds Analysis**

#### Purdue Cash Distributions Flow of Funds Analysis – Cash Distribution Testing Selections

As illustrated in this section of the Cash Distribution Analysis, we performed a flow of funds analysis on each classification of Cash Distributions (Non-Tax US Partner, Non-Tax Ex-US and Tax Distributions) made by Purdue and included in Purdue's Internal Distributions Analysis and the October 19, 2018 MDL Presentation, across various years from 2008 through 2018 (collectively referred to as the "Purdue Cash Distribution Testing Selections"):

#### Purdue Non-Tax Cash Distributions<sup>1</sup>

- Selection 1 Ex-US Cash Distribution to foreign entity (Clovio Corporation), February 2017
- Selection 2 Ex-US Cash Distribution to foreign entity (Lucien Holdings S.ar.l.), June 2017
- Selection 3 Ex-US Cash Distribution to Beacon Company and Rosebay Medical Company L.P., December 2015
- Selection 4 Ex-US Cash Distribution to foreign entities (Mexcus Corp and Maltus Corp), July 2016
- Selection 5 Ex-US Cash Distribution to foreign entity (Mundipharma KK, aka Mundipharma Japan), July 2016
- Selection 6 Ex-US Cash Distribution to foreign entity (Mundipharma KK, aka Mundipharma Japan), July 2017
- Selection 7 US Partner Cash Distribution to Beacon Company and Rosebay Medical Company L.P., June 2011
- Selection 8 US Partner Cash Distribution to Beacon Company and Rosebay Medical Company L.P., March 2009
- Selection 9 US Partner Cash Distributions to PPI and PLP Associates Holdings Inc., December 2012 (PPI and PLP Associates Holdings Inc. then Paid Dividends to Banela Corporation, Linerite Holdings LLC, and Perthlite Holdings LLC)

#### **Purdue Tax Distributions**

- Selection 10 Tax Distribution for estimated federal tax payment, Q3 2014
- Selection 11 Tax Distribution for estimated federal tax payment, Q1 2016
- Selection 12 Tax Distribution for estimated Connecticut state tax, Q3 2015

#### Purdue Cash Distributions Flow of Funds Analysis – Observations and Findings

The following summary of observations and findings is based upon our review and analysis of various sources of information obtained from Purdue related to the Purdue Cash Distribution Testing Selections:

- 1. Purdue Distributions made on or after January 1, 2008 are classified in the October 19, 2018 MDL Presentation and Purdue's Internal Distribution Analysis as either:
  - Non-Tax Cash Distributions (US Partner Cash Distributions and Ex-US Cash Distributions);
  - Loans made by Purdue to PRA L.P.;
  - Tax Distributions (federal and state); or
  - Non-Cash/Stock Distributions (see the Intercompany and Non-Cash Transfers Report).
- 2. Purdue Cash Distribution Testing Selections generally flowed up from Purdue to and through PRA L.P. and were either invested in IACs, or continued to flow up through other holding companies to trusts established for the benefit of the Sackler Family members or to taxing authorities.
  - For the Purdue Non-Tax Cash Distribution Testing Selections, distributions generally flowed from Purdue up to and through PRA L.P. and other holding companies before ultimately being invested in IACs.
    - o US Partner Cash Distributions generally flowed up through PRA L.P. and other holding companies to Beacon Company and Rosebay Medical Company L.P.
    - o Ex-US Cash Distributions, including loans made by Purdue, generally flow up through PRA L.P. and other holding companies, before ultimately being invested in foreign IACs.
  - For the Purdue Tax Distribution Testing Selections, the flow of distributions depended on whether payment was to federal or state taxing authorities.
    - For federal Tax Distribution Testing Selections 10 and 11, distributions generally flowed from Purdue up to and through PRA L.P. and other holding companies, and then to Rosebay Medical Company L.P., Beacon Company or a taxing authority on behalf of those entities.
    - For state Tax Distribution Testing Selection 12, Purdue sent funds directly to Rosebay Medical Company L.P. and Beacon Company.<sup>1</sup>

#### Purdue Cash Distributions Flow of Funds Analysis – Observations and Findings

- 3. Purdue's accounting for the Purdue Cash Distribution Testing Selections' flow of funds from Purdue up to and through one or more Affiliated Entities is consistent with the available written approval and authorization documents supporting these distributions.
- 4. For the Purdue Non-Tax Cash Distribution Testing Selections, the payee/beneficiary name recorded in Purdue's accounts payable detail of the SAP general ledger system matches the payee/beneficiary name reported in Purdue's Internal Distribution Analysis.
  - The payee/beneficiary name is also consistent with the name listed in the available wire instructions, payment detail reports prepared by Purdue's Treasury Department, written consents of the general partner, estimated tax calculation worksheets prepared by Purdue's Tax Department (now TXP) and bank account statements.
- 5. Purdue's classification of the Purdue Cash Distribution Testing Selections as Non-Tax Cash Distributions and Tax Distributions in Purdue's Internal Distribution Analysis and the October 19, 2018 MDL Presentation appears consistent with the information and supporting documentation obtained from Purdue.
  - The books and records for Rosebay Medical Company L.P. and Beacon Company are not maintained in the same SAP accounting system as Purdue, and therefore subsequent transactions and/or the use of funds received by these Affiliated Entities cannot be identified in Purdue's books and records.
  - For the Purdue Tax Distribution Testing Selections that flowed from Purdue directly or indirectly to Rosebay Medical Company L.P. and/or Beacon Company through Affiliated Entities, we are unable to determine from the books and records maintained by Purdue whether Rosebay Medical Company L.P. or Beacon Company used the distributions to make tax-related payments to the appropriate taxing authorities.

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#### **Purdue Non-Tax Cash Distributions**

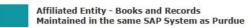
#### **Alix**Partners

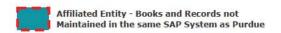
# Selection 1 Purdue Ex-US Cash Distributions (2017)

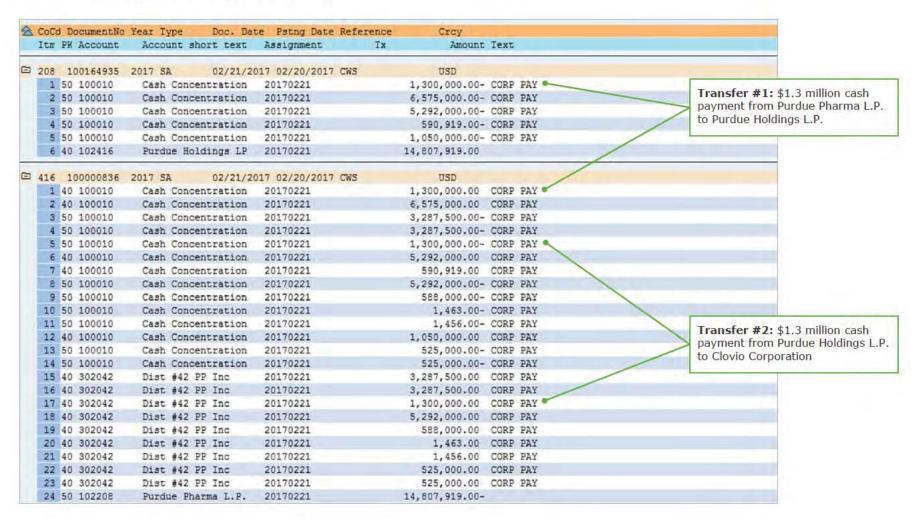


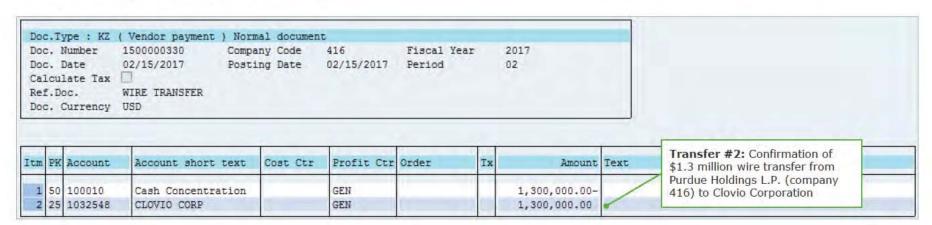
- This transfer represents a cash transfer to PRA L.P. (formerly Purdue Holdings L.P.). A promissory note was subsequently issued by PRA L.P. to Purdue for this amount. As previously explained, this amount is not included in the Purdue's Cash Distributions because it was treated by Purdue as a loan. PRA L.P. transferred these funds to an Ex-US Affiliate (i.e., Clovio Corporation). The full amount of the loan has since been repaid to Purdue in full with interest.

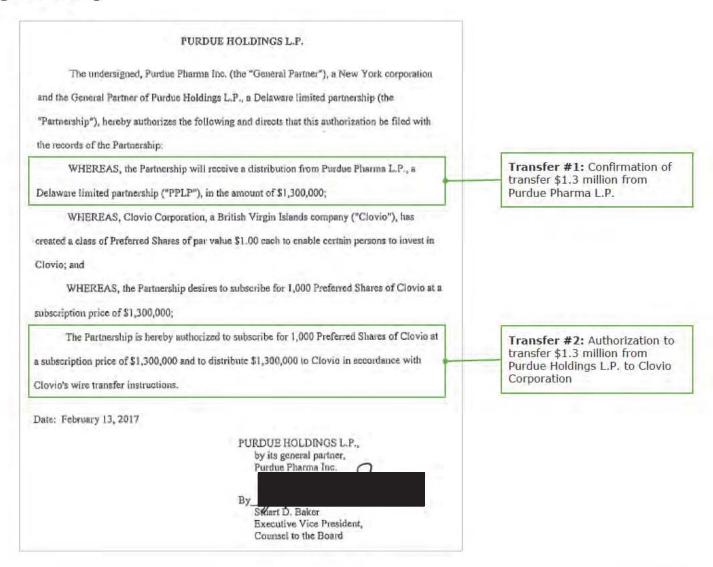


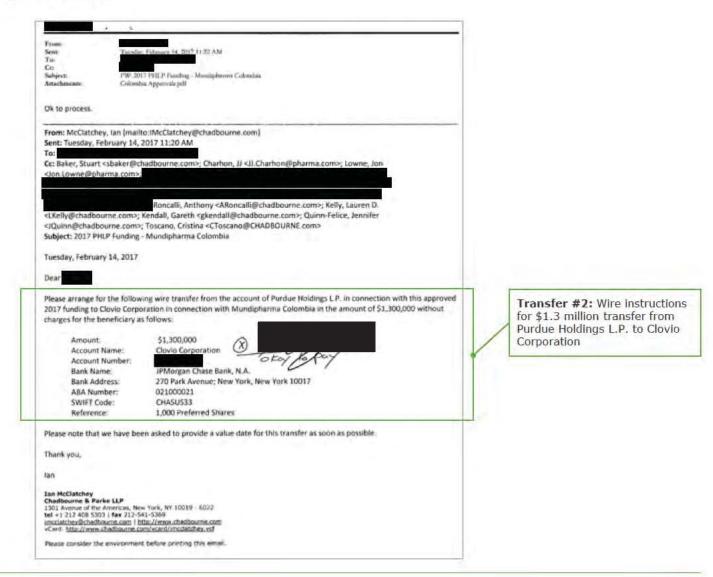


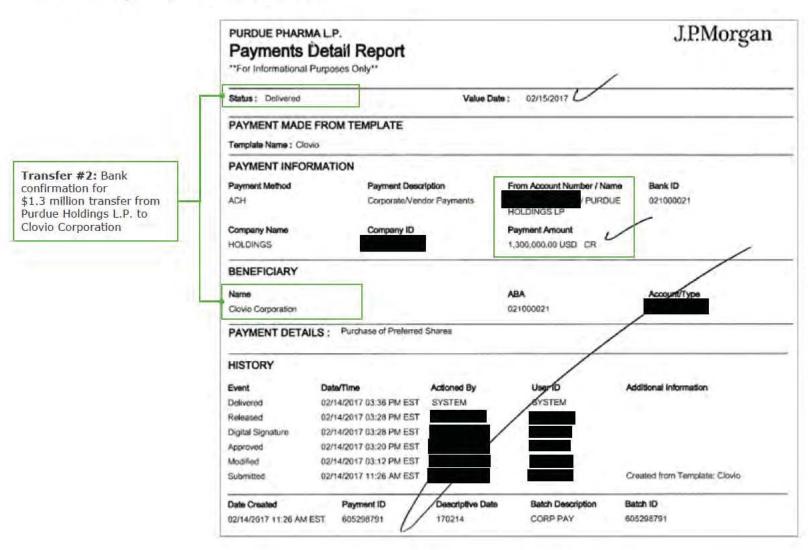


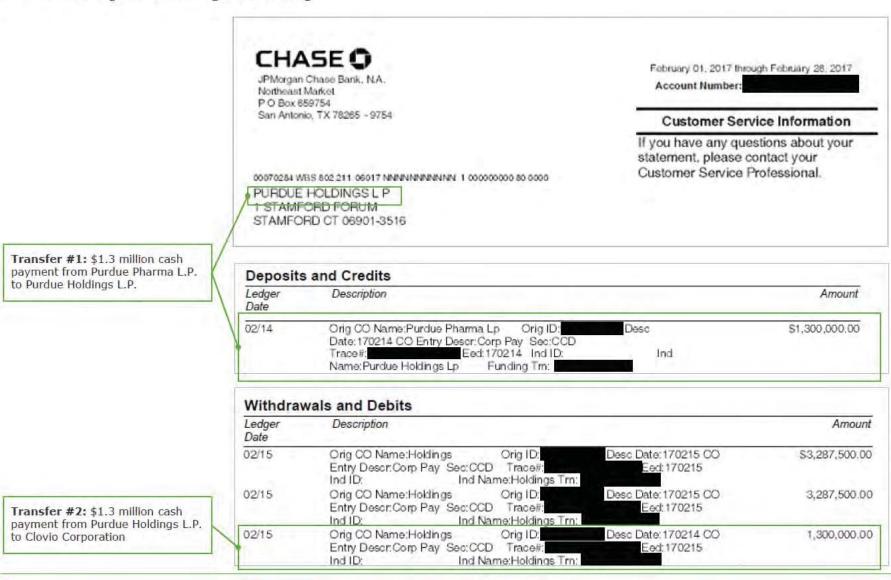












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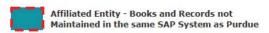
# Selection 2 Purdue Ex-US Cash Distributions (2017)

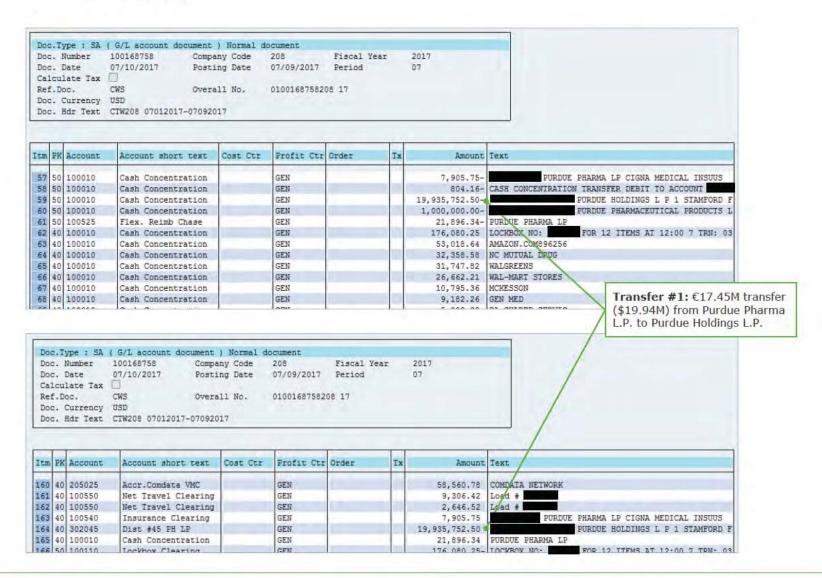
#### Selection 2 – Ex-US Cash Distribution to Lucien Holdings S.ar.l., June 2017

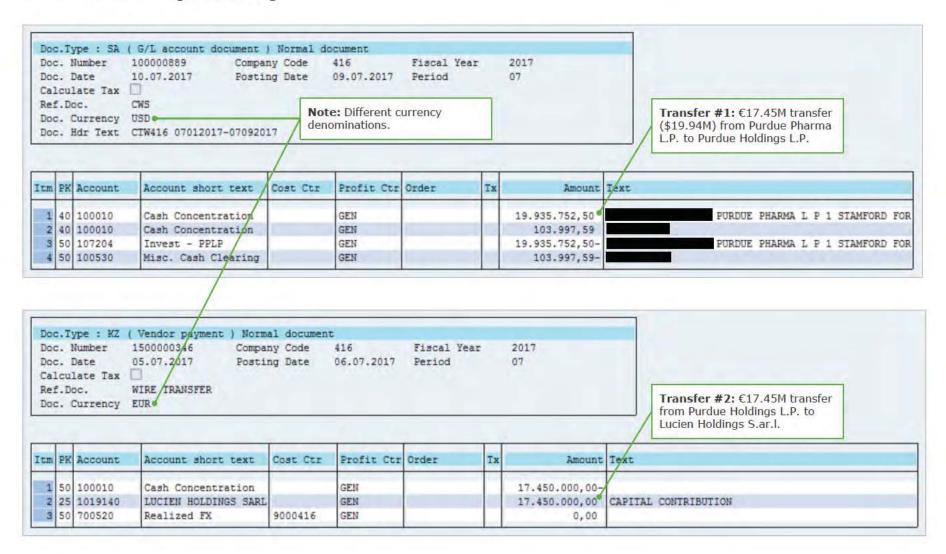


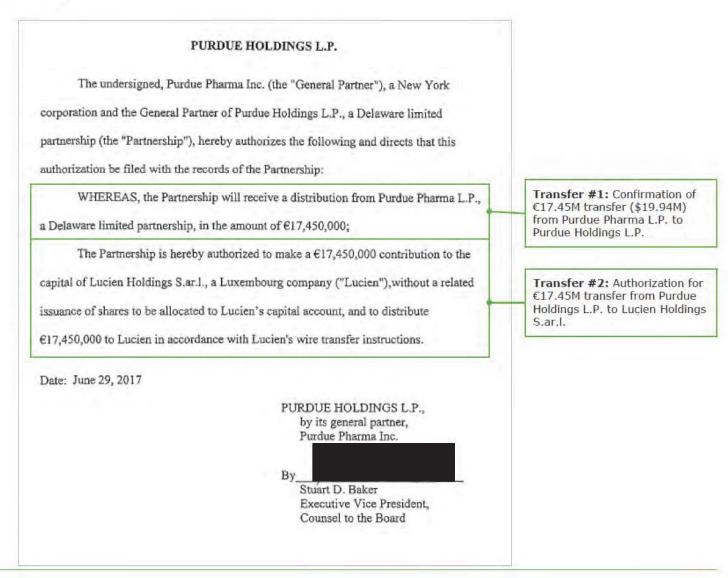
- This transfer represents a cash transfer to PRA L.P. (formerly Purdue Holdings L.P.). A promissory note was subsequently issued by PRA L.P. to Purdue for this amount. As previously explained, this amount is not included in the Purdue's Cash Distributions because it was treated by Purdue as a loan. PRA L.P. transferred these funds to an Ex-US Affiliate (i.e., Lucien Holdings S.ar.I.). The full amount of the loan has since been repaid to Purdue in full with interest.

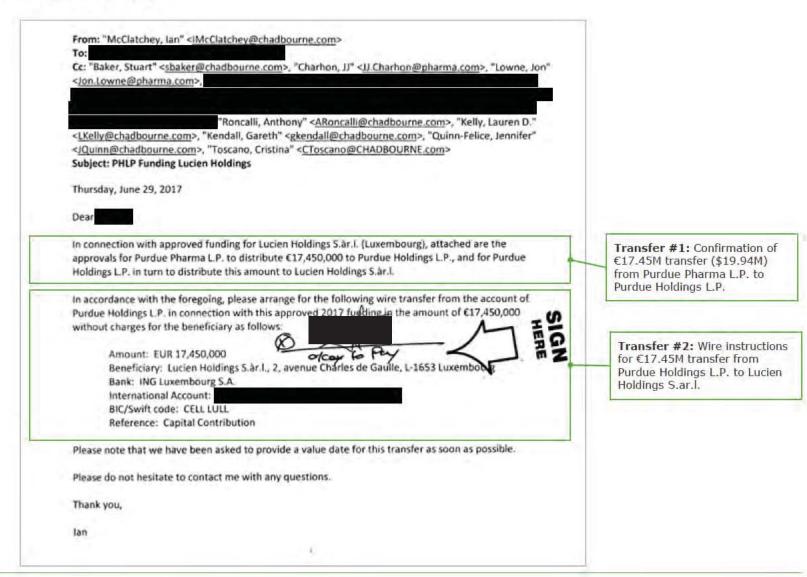


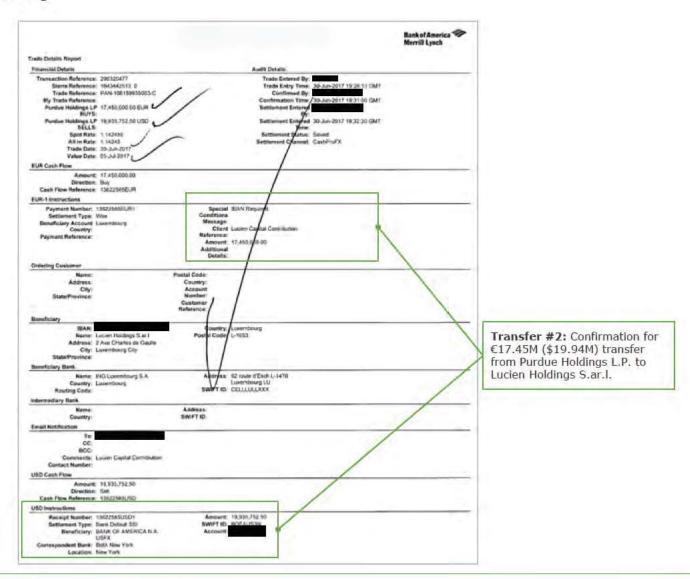


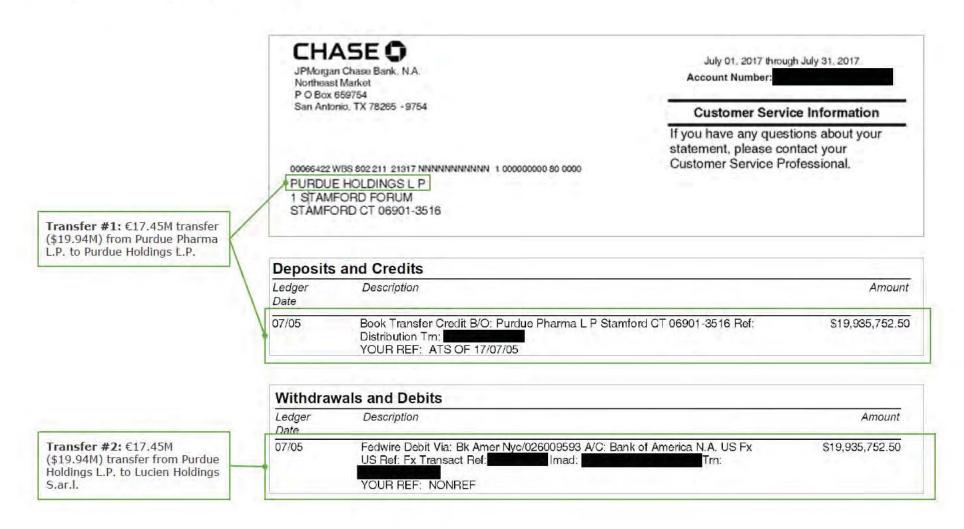






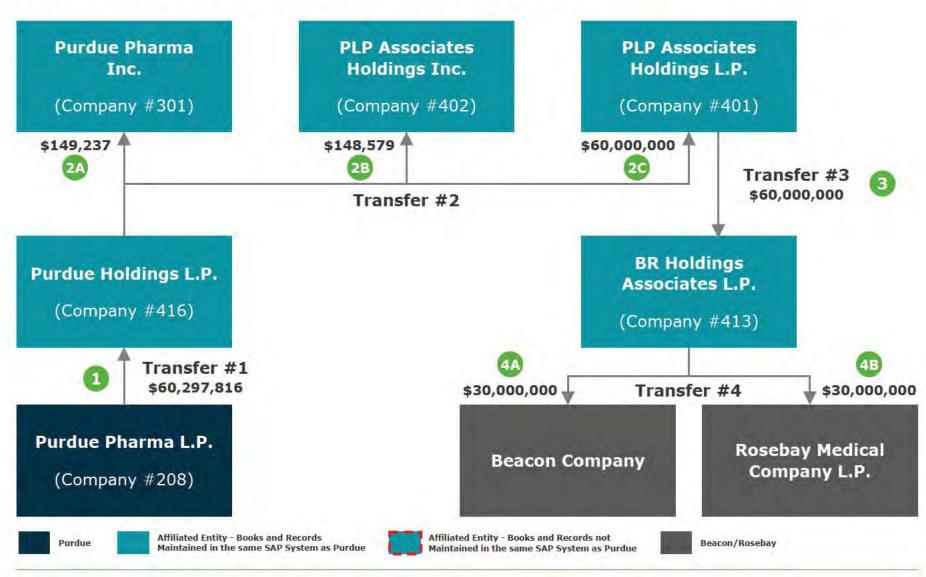




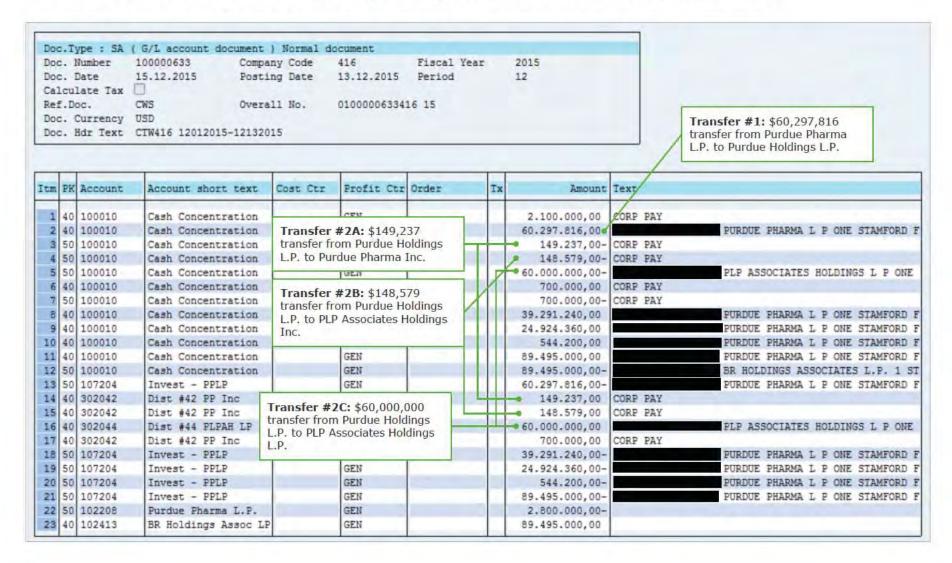


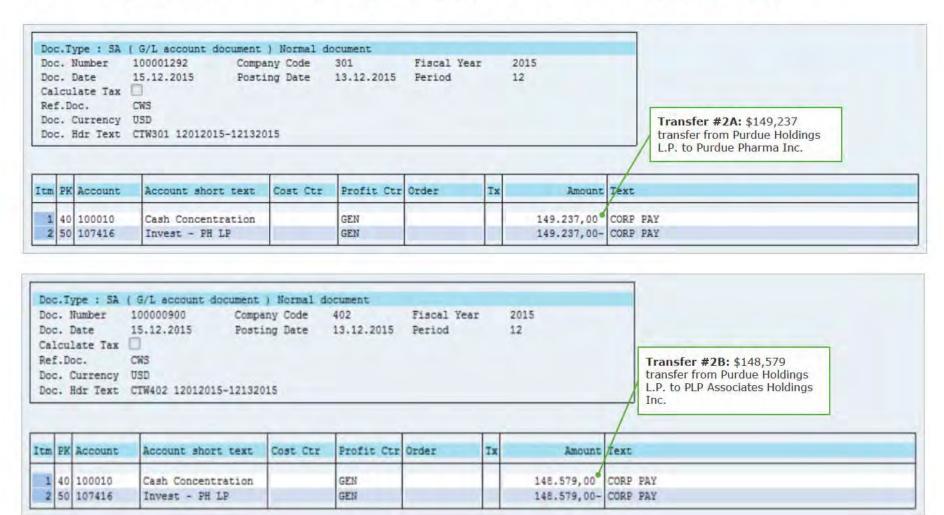
#### **Alix**Partners

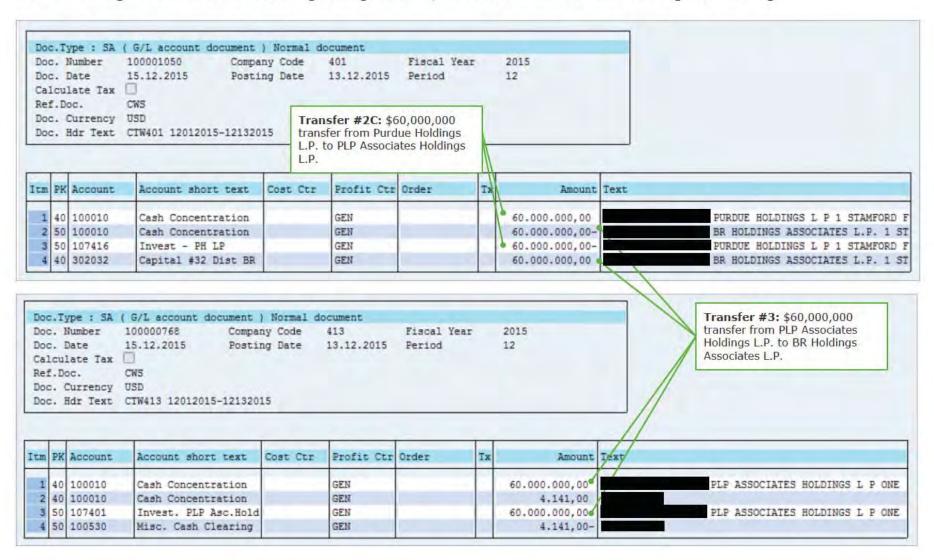
# Selection 3 Purdue Ex-US Cash Distributions (2015)

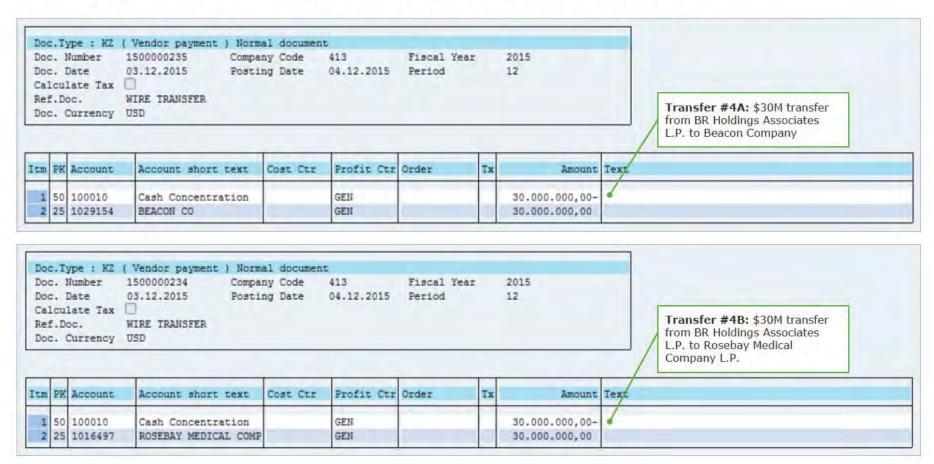


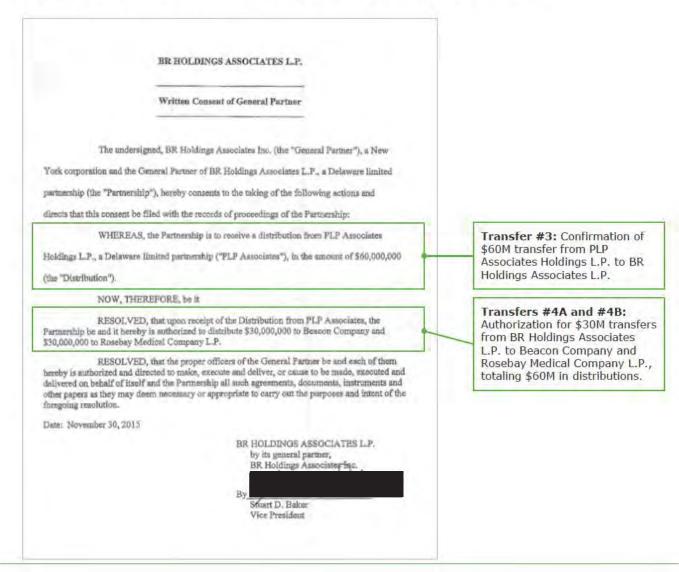


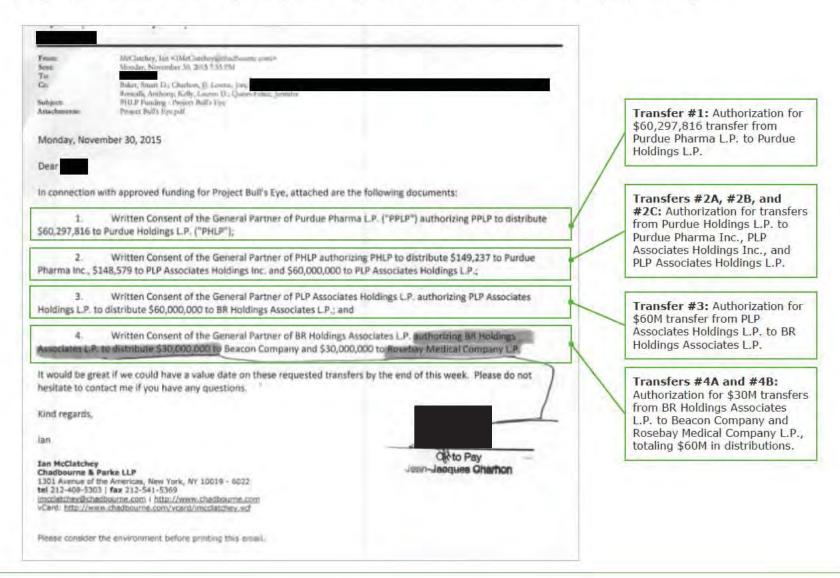


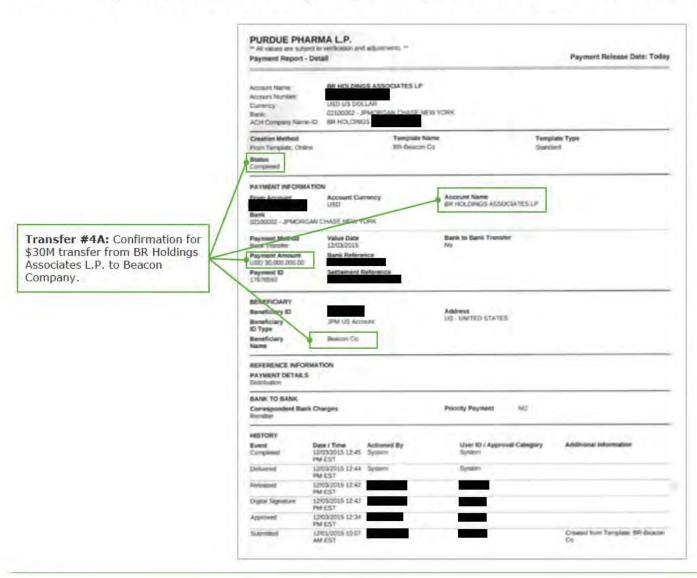




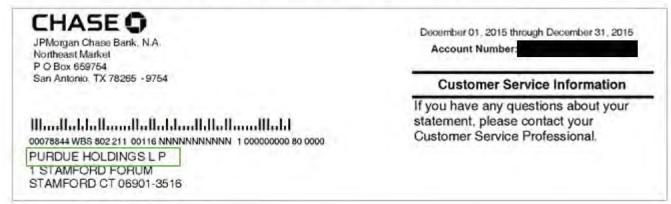




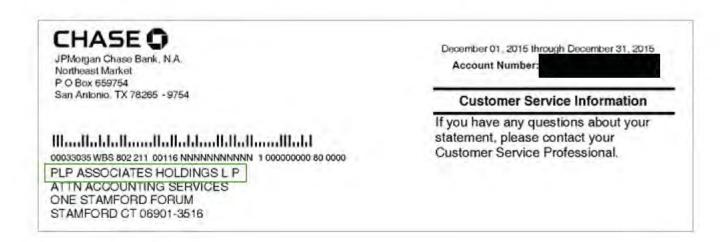




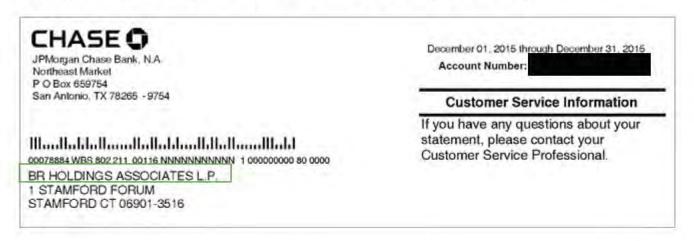




**Deposits and Credits** Ledger Description Amount Date Transfer #1: \$60,297,816 transfer from Purdue Pharma Book Transfer Credit B/O: Purdue Pharma L P Stamford CT 06901-3431 Ref: 12/03 \$60,297,816.00 L.P. to Purdue Holdings L.P. Distribution Trn: YOUR REF: ATS OF 15/12/02 Withdrawals and Debits Ledger Description Amount Transfer #2C: \$60,000,000 transfer from Purdue Holdings Date L.P. to PLP Associates Holdings Book Transfer Debit A/C: Plp Associates Holdings L P Stamford CT 12/03 \$60,000,000.00 06901-3431 Ref: Distribution Trn: YOUR REF: NONREF 12/03 Chips Debit Via: Hsbc Bank USA, N.A./0108 A/C: Hsbc Singapore Singapore 2,100,000.00 Transfer #2A: \$149,237 049320 Ben: Mundipharma Singapore Holding Pte Sg Ref: Preffered Shares transfer from Purdue Holdings Ssn: Trn: L.P. to Purdue Pharma Inc. YOUR BEE! NONBEE 12/03 Orig CO Name: Holdings Orig ID: Desc Date: 151203 CO 149,237.00 Entry Descr:Corp Pay Sec:CCD Trace#1 Eed:151203 Transfer #2B: \$148,579 Ind Name: Holdings Trn: transfer from Purdue Holdings 12/03 Orig CO Name: Holdings Orig ID: Desc Date: 151203 CO 148,579.00 L.P. to PLP Associates Holdings Entry Descr:Corp Pay Sec:CCD Trace#: Eed:151203 Inc. Ind ID: Ind Name: Holdings Trn:



**Deposits and Credits** Ledger Description Amount Date Transfer #2C: \$60,000,000 Book Transfer Credit B/O: Purdue Holdings L P Stamford CT 06901-3516 Ref: 12/03 \$60,000,000.00 transfer from Purdue Holdings Distribution Trn: L.P. to PLP Associates Holdings YOUR REF: ATS OF 15/12/02 L.P. Orig CO Name: Holdings 12/22 Orig ID: Desc Date: 151222 CO 196,000.00 Entry Descr:Corp Pay Sec:CCD Trace#: Eed: 151222 Ind ID: Ind Name:Plp Assoc Holdings Lp Funding Trn: \$60,196,000.00 Total Withdrawals and Debits Ledger Description Amount Date Transfer #3: \$60,000,000 transfer from PLP Associates 12/03 Book Transfer Debit A/C: Br Holdings Associates L.P. Stamford CT \$60,000,000.00 Holdings L.P. to BR Holdings 06901-3516 Ref: Distribution Trn: Associates L.P. YOUR REF: NONREF



Deposits and Credits

Ledger Value Description
Date Date

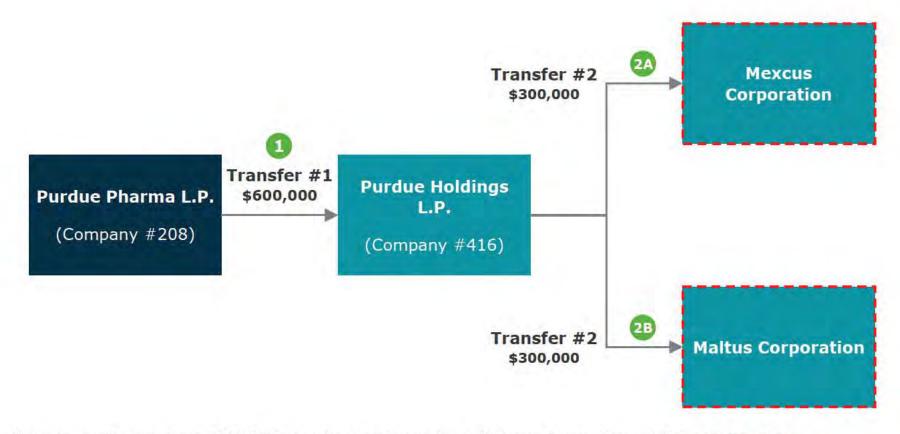
Transfer #3: \$60,000,000
transfer from PLP Associates
Holdings L.P. to BR Holdings
Associates L.P.

Book Transfer Credit B/O: Plp Associates Holdings L P Stamford CT
06901-3431 Ref: Distribution Trn:
YOUR REF: ATS OF 15/12/02

Ledger Date	Value Date	Description	Amount
12/03		Book Transfer Debit A/C: Rosebay Medical CO L P Oklahoma City OK 73134-2617 Ref: Distribution Tm: YOUR REF: NONREF	\$30,000,000.00
12/03		Book Transfer Debit A/C: Beacon CO Zurich Switzerland Ch-80-55 Ref: Distribution Trn: YOUR REF: NONREF	30,000,000.00

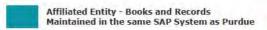
#### **Alix**Partners

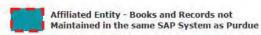
# Selection 4 Purdue Ex-US Cash Distributions (2016)

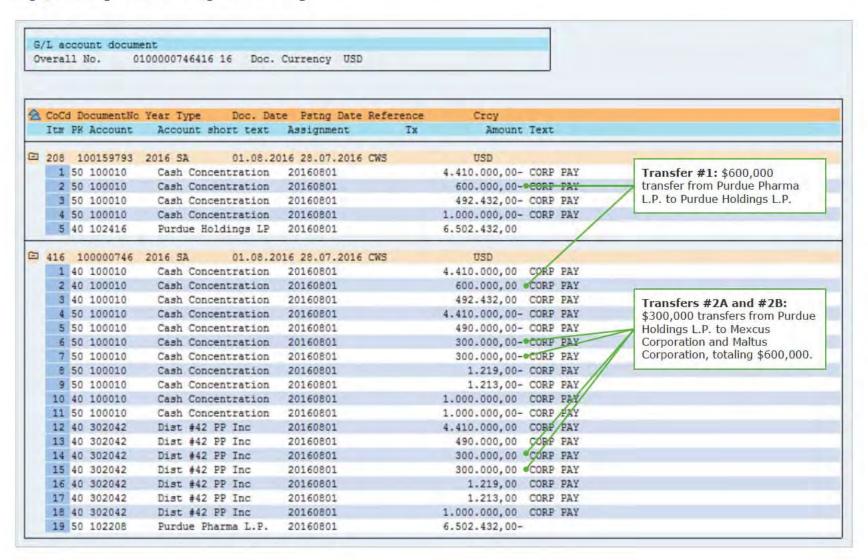


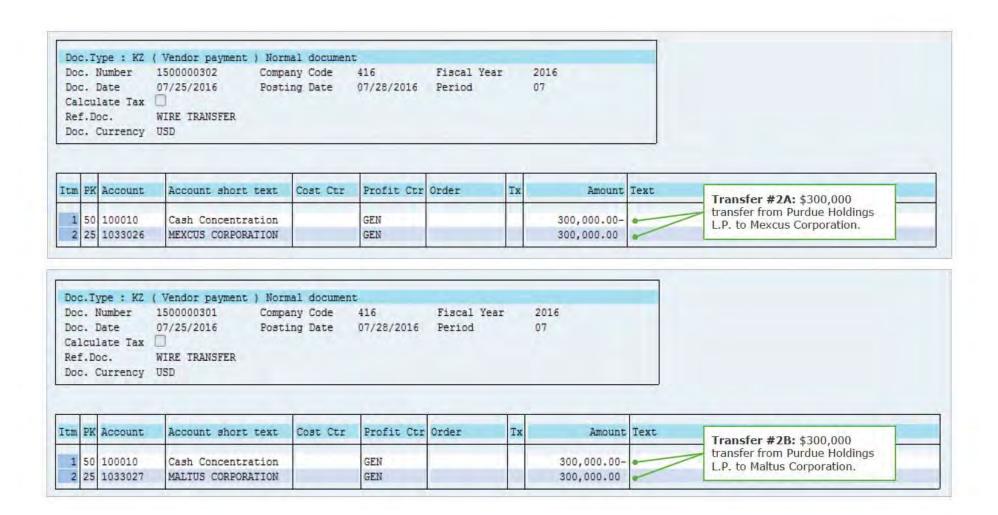
Note: Per email instructions, \$300,000 was subsequently sent by each Mexcus Corporation and Maltus Corporation to Mundipharma Mexico. However, since books and records for Mexcus, Maltus and Mundipharma Mexico are not maintained by Purdue, these subsequent transactions cannot be identified using Purdue's books and records.

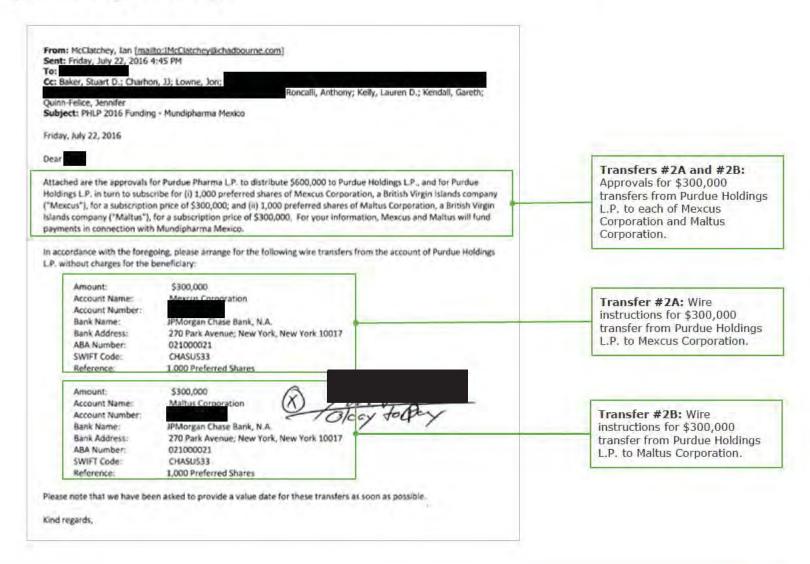


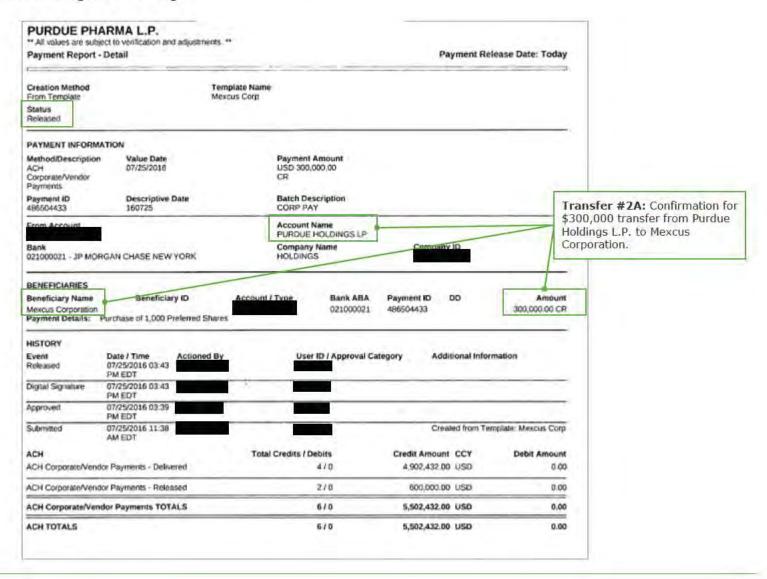


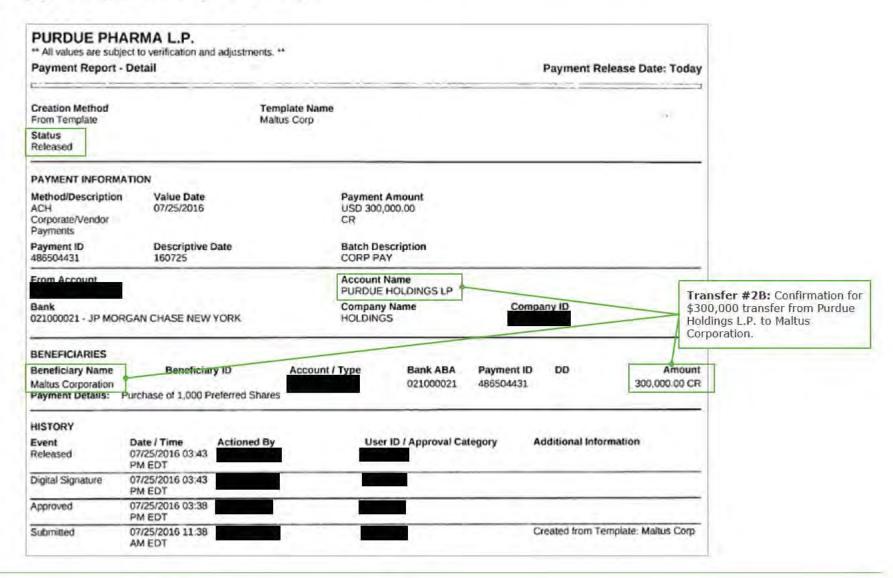


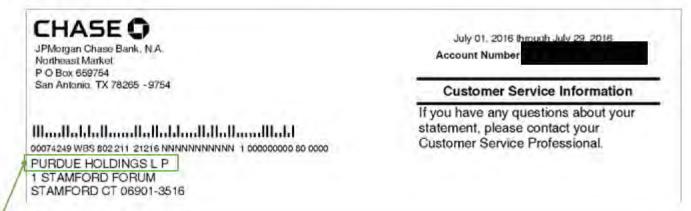






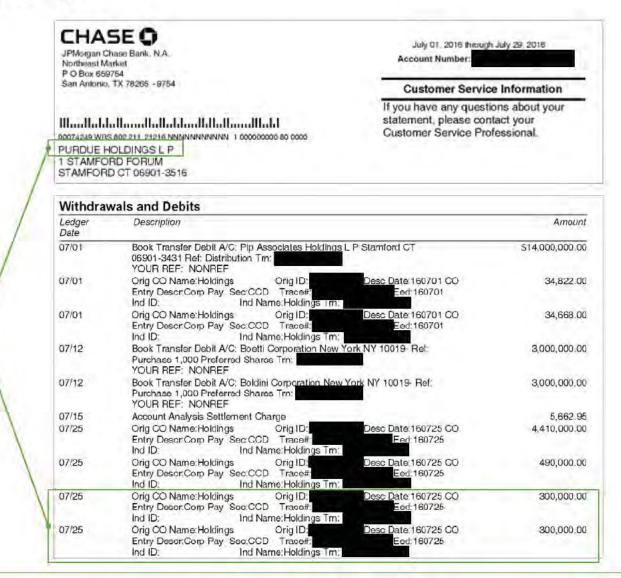






Transfer #1: \$600,000 transfer from Purdue Pharma L.P. to Purdue Holdings L.P.

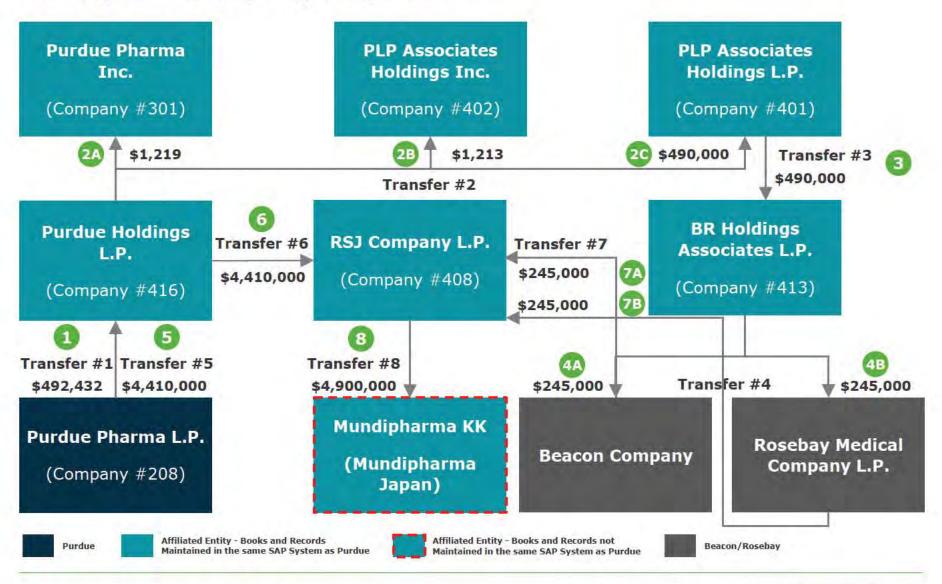
Ledger Date	Description	Amount
07/01	Book Transfer Credit B/O: Purdue Pharma L P Stamford CT 06901-3431 Ref: Distribution Tm: YOUR REF: ATS OF 16/07/01	\$14,069,490.00
07/12	Book Transfer Credit B/O: Purdue Pharma L P Stamford CT 06901-3431 Ref: Distribution Tm: YOUR REF: ATS OF 16/07/12	6,000,000.00
07/25	Orig CO Name:Purdue Pharma Lp Orig ID: Desc Date:160725 CO Entry Descr:Corp Pay Sec:CCD Trace#: Eed:160725 Ind ID: Ind Name:Purdue Holdings Lp Funding Trn:	4,410,000.00
07/25	Orig CO Name:Purdue Pharma Lp Orig ID: Desc Date:160725 CO Entry Descr:Corp Pay Sec:CCD Trace#: Eed:160725 Ind ID: Ind Name:Purdue Holdings Lp Funding Tm:	00.000,00
07/25	Orig CO Name:Purdue Pharma Lp Orig ID:  Date:160725 CO Entry Descr:Corp Pay Sec:CCD  Trace#:  Eed:160725 Ind ID: Ind  Name:Purdue Holdings Lp Funding Trn:	492,432.00

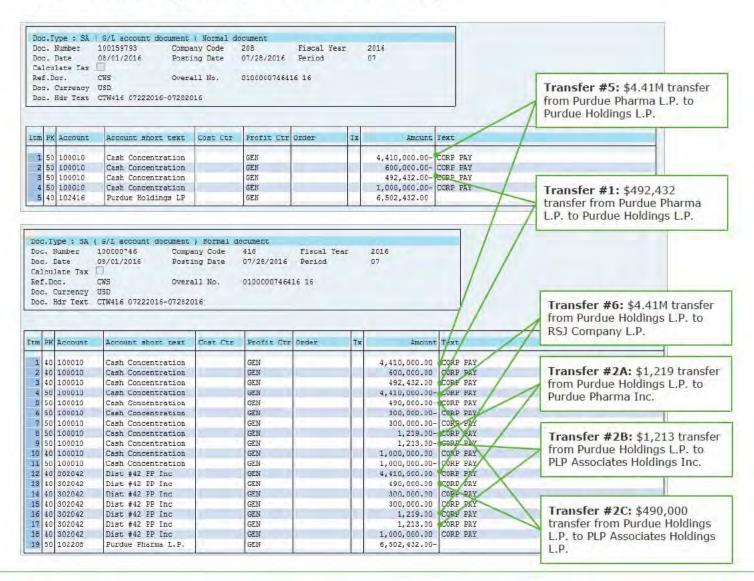


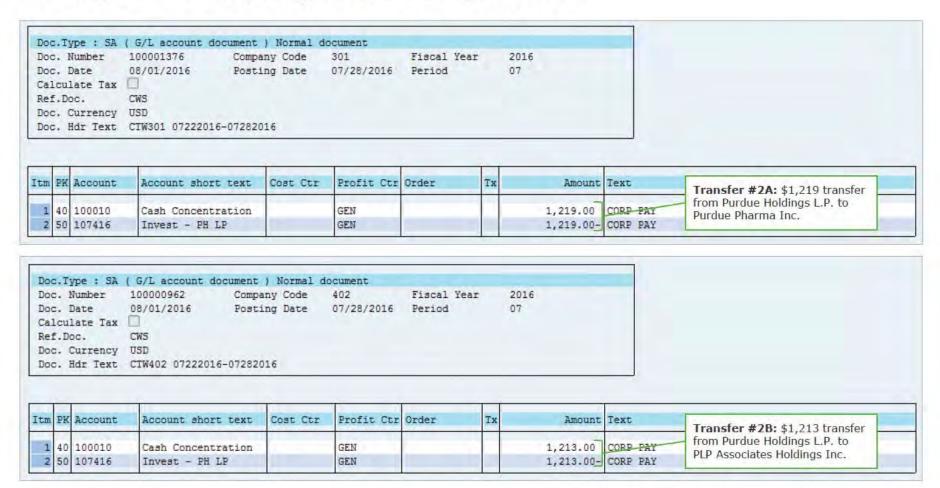
Transfers #2A and #2B: \$300,000 transfers from Purdue Holdings L.P. to each of Mexcus Corporation and Maltus Corporation.

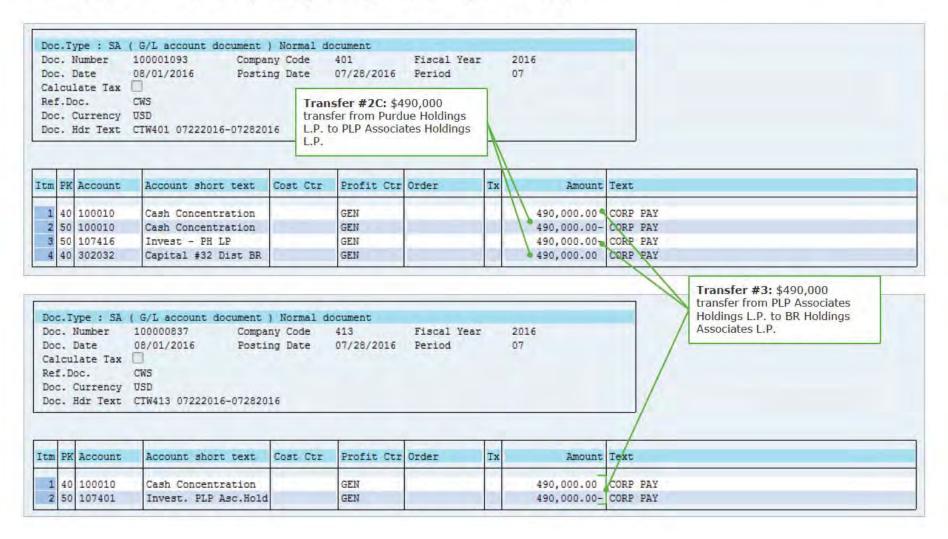
#### **Alix**Partners

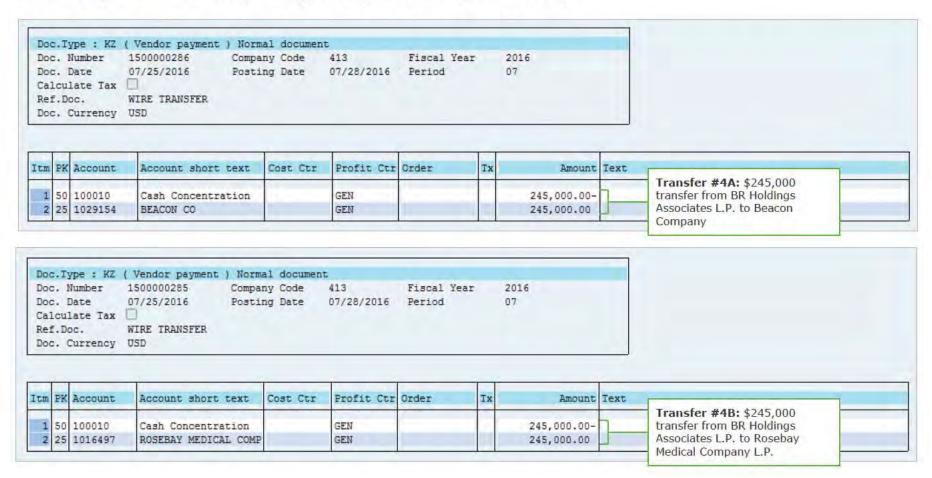
# Selection 5 Purdue Ex-US Cash Distributions (2016)

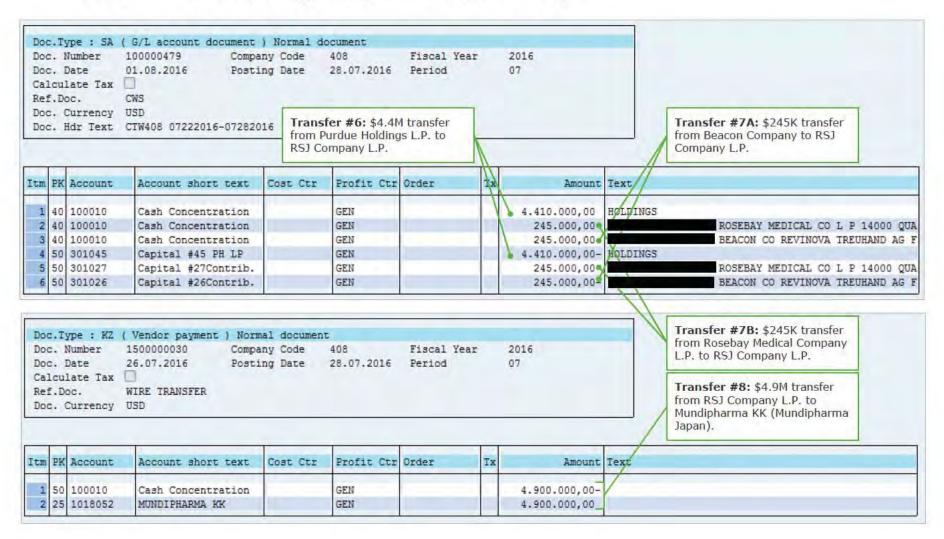












BR HOLDINGS ASSOCIATES L.P.

Written Consent of General Partner

The undersigned, BR Holdings Associates Inc. (the "General Partner"), a

New York corporation and the General Partner of BR Holdings Associates L.P., a

Delaware limited partnership (the "Partnership"), hereby consents to the taking of the
following action and directs that this consent be filed with the records of proceedings of
the Partnership:

Transfer #3: \$490,000 transfer from PLP Associates Holdings L.P. to BR Holdings Associates L.P. WHEREAS, the Partnership is to receive a distribution from PLP

Associates Holdings L.P. ("PLP Associates") in the amount of \$490,000 (the "Distribution").

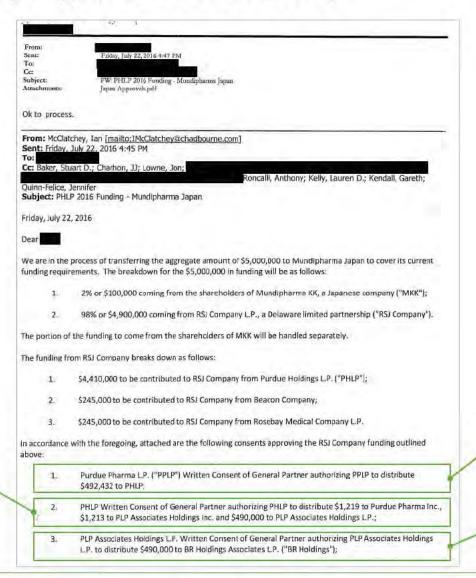
NOW, THEREFORE, be it

RESOLVED, that upon receipt of the Distribution from PLP Associates, the Partnership be and it hereby is authorized to distribute \$245,000 to Beacon Company and \$245,000 to Rosebay Medical Company L.P.

Date: July 22, 2016

BR HOLDINGS ASSOCIATES L.P., by its general partner, BR Holdings Associates Inc.

Stuart D. Baker Vice President Transfers #4A and #4B: \$245,000 transfers from BR Holdings Associates L.P. to Beacon Company and Rosebay Medical Company L.P., totaling \$490,000



**Transfer #1:** Authorization for \$492,432 transfer from Purdue Pharma L.P. to Purdue Holdings I.P.

**Transfer #3:** Authorization for \$490,000 transfer from PLP Associates Holdings L.P. to BR Holdings Associates L.P.

Transfers #2A, #2B, and

#2C: Authorization for the

Holdings Inc.

\$490,000 to PLP

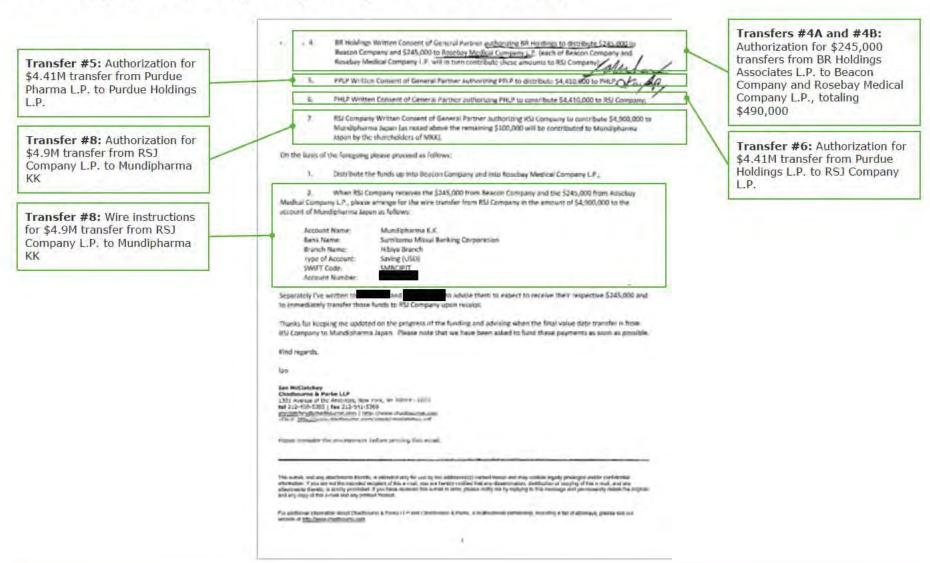
Holdings L.P.:

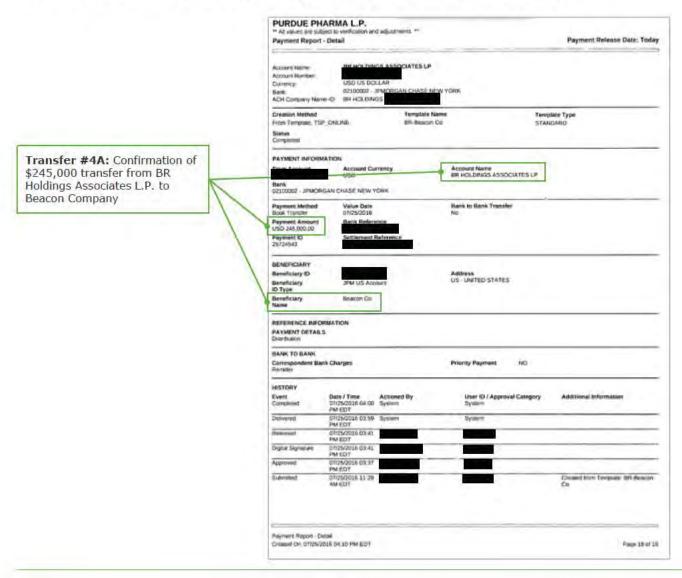
following transfers from Purdue

\$1,219 to Purdue Pharma

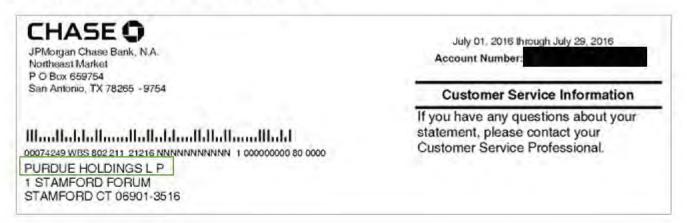
\$1,213 to PLP Associates

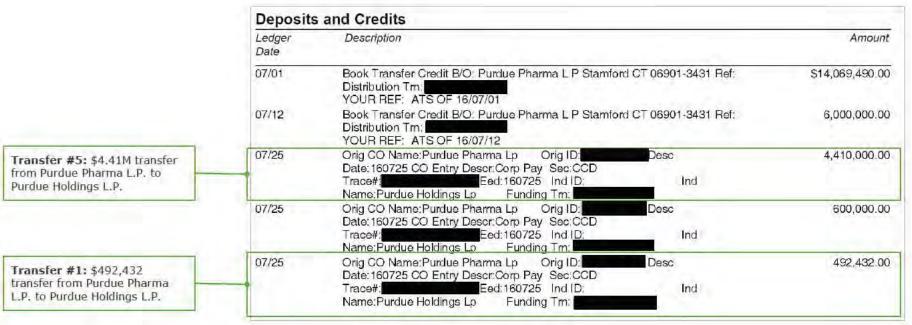
Associates Holdings L.P.

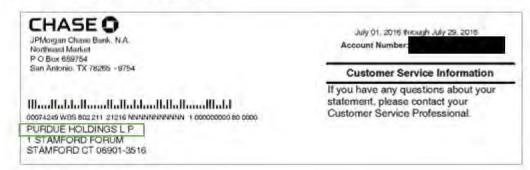


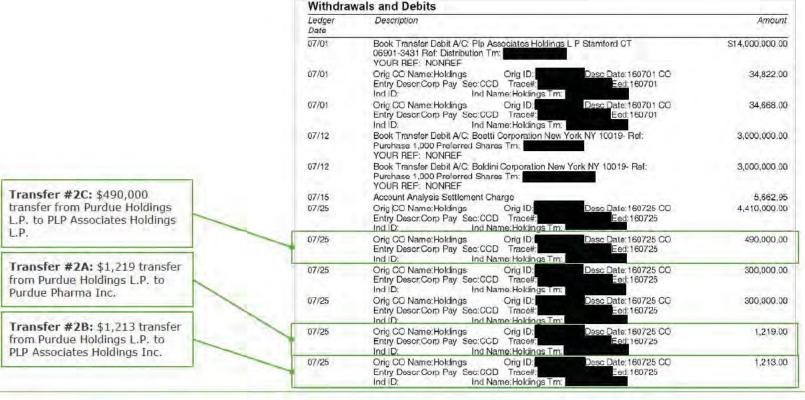


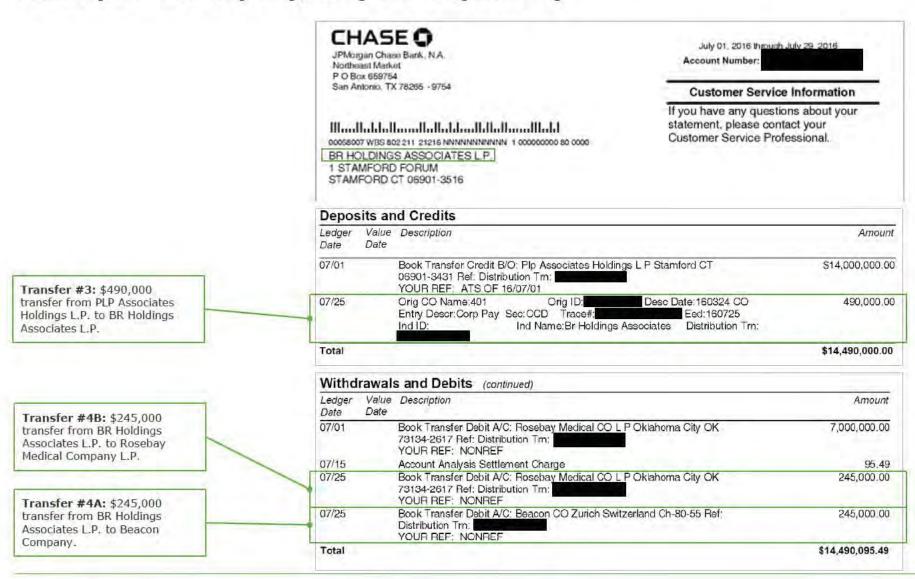


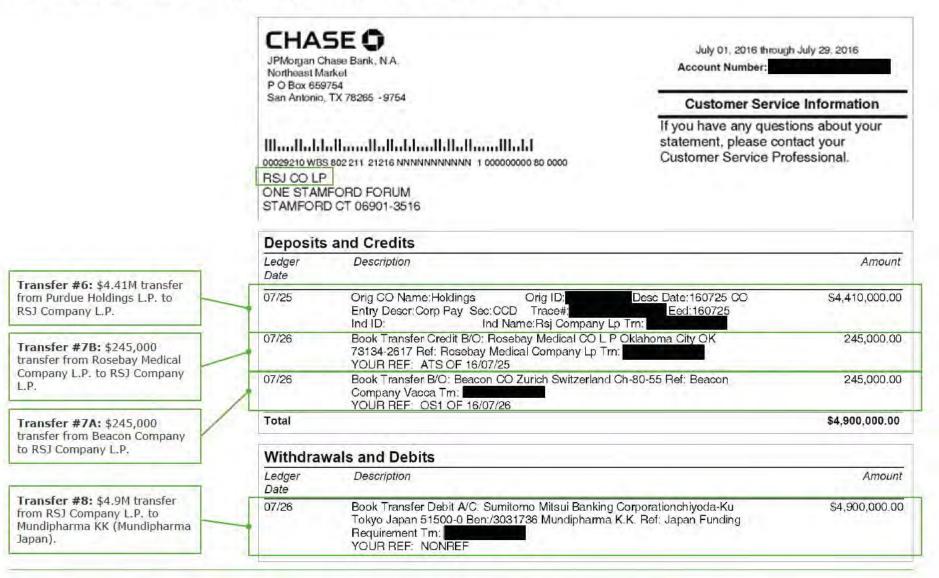






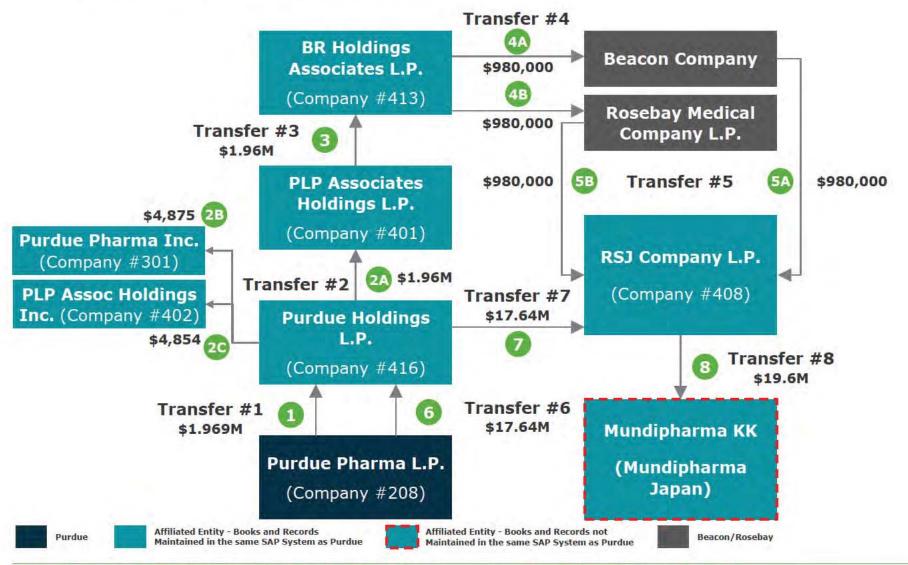


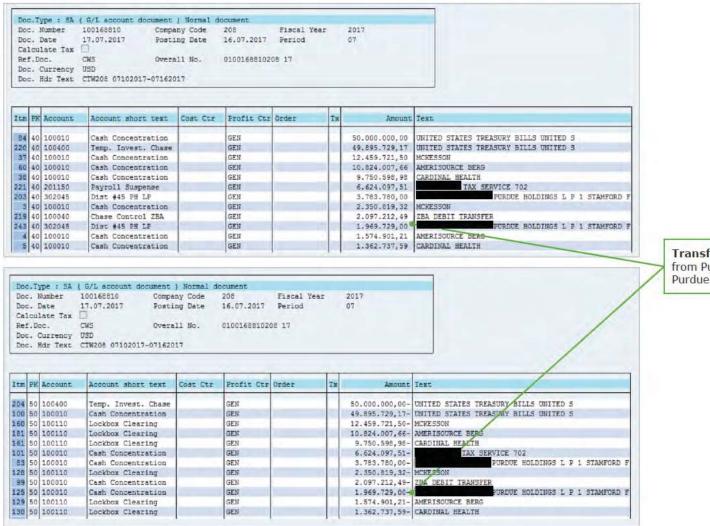




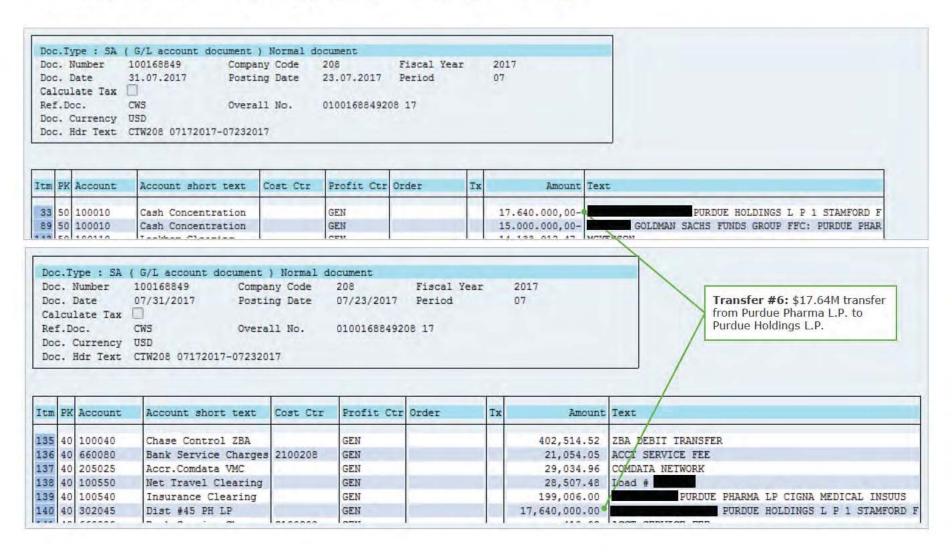
#### **Alix**Partners

# Selection 6 Purdue Ex-US Cash Distributions (2017)

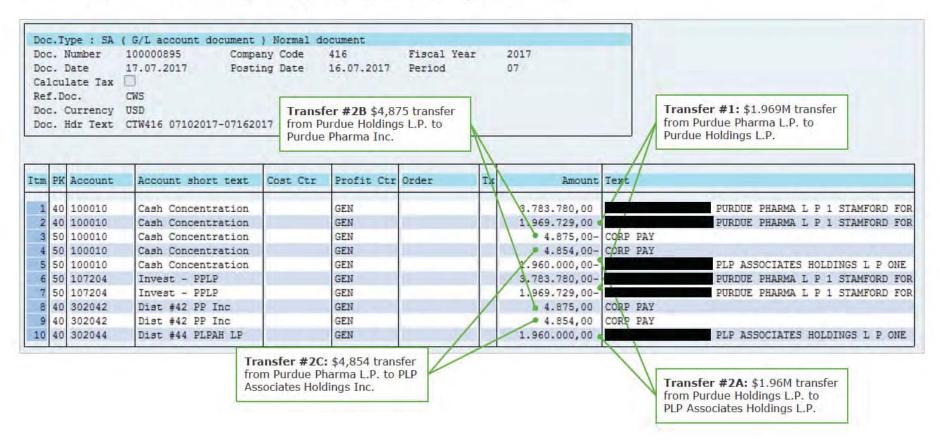


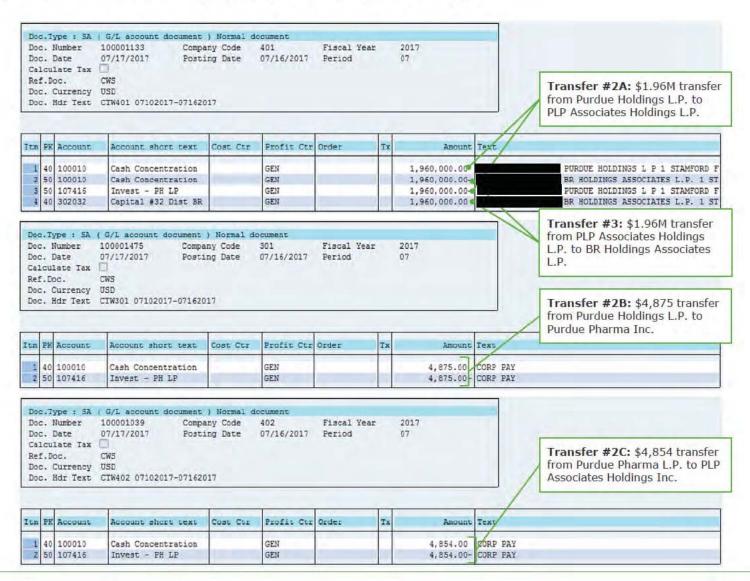


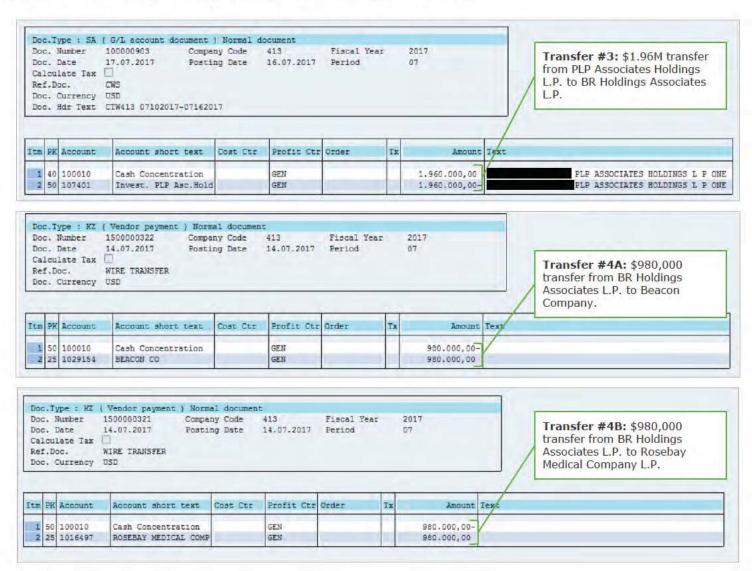
**Transfer #1:** \$1.969M transfer from Purdue Pharma L.P. to Purdue Holdings L.P.

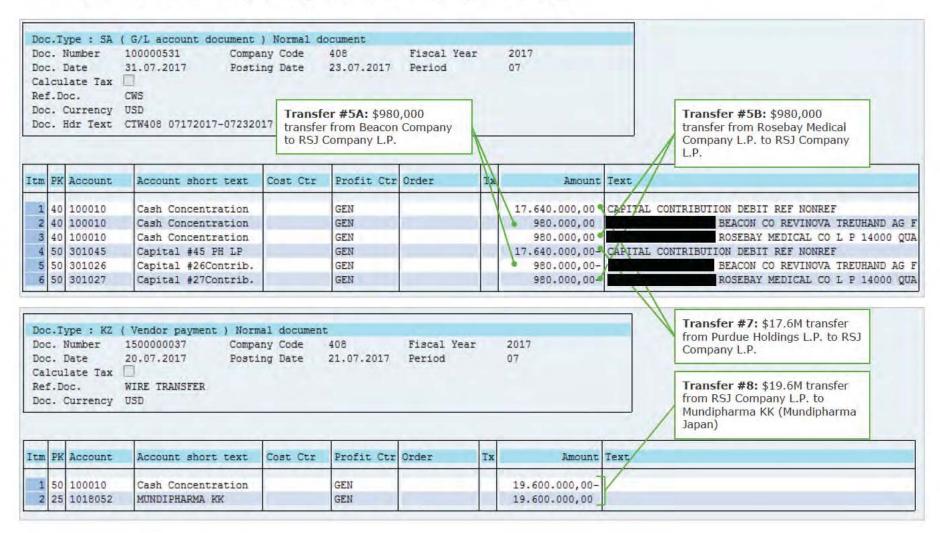


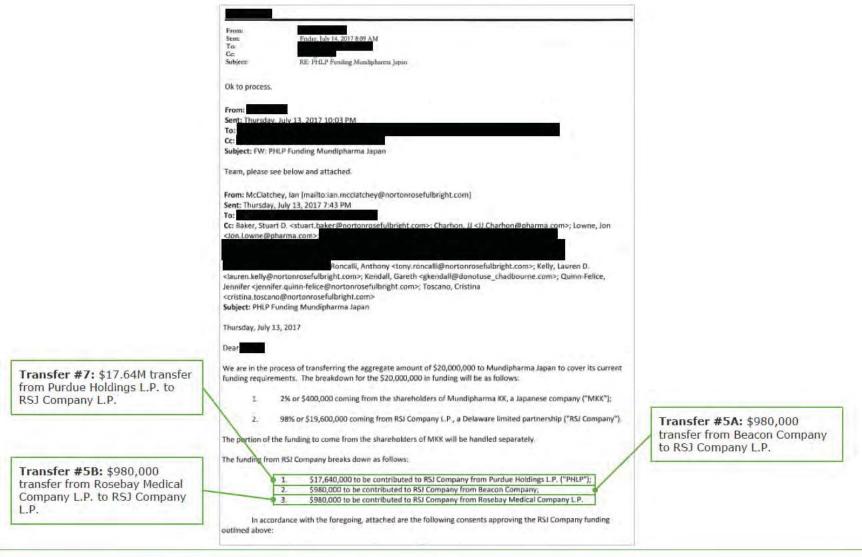












Transfer #1: Authorization for \$1.969M transfer from Purdue Pharma L.P. to Purdue Holdings L.P.

**Transfer #3:** Authorization for \$1.96M transfer from PLP Associates Holdings L.P. to BR Holdings Associates L.P.

**Transfer #6:** Authorization for \$17.64M transfer from Purdue Pharma L.P. to Purdue Holdings L.P.

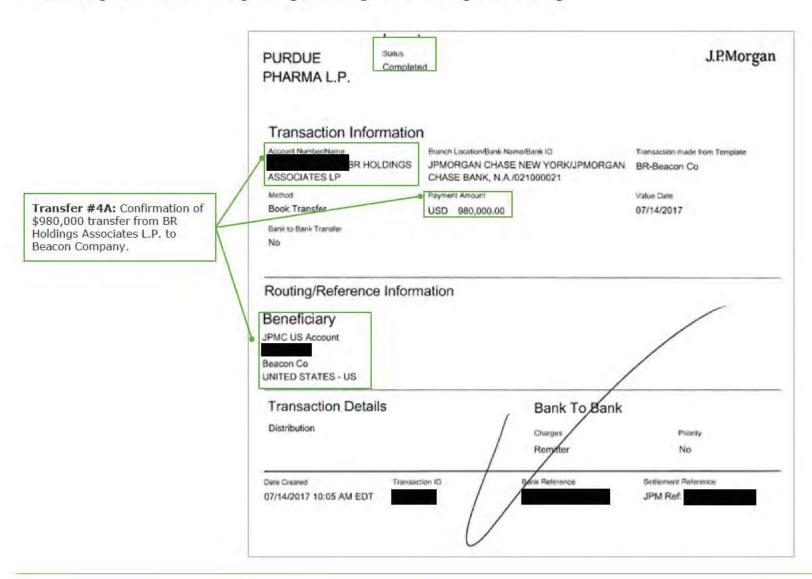
Transfer #7: Authorization for \$17.64M transfer from Purdue Holdings L.P. to RSJ Company I P

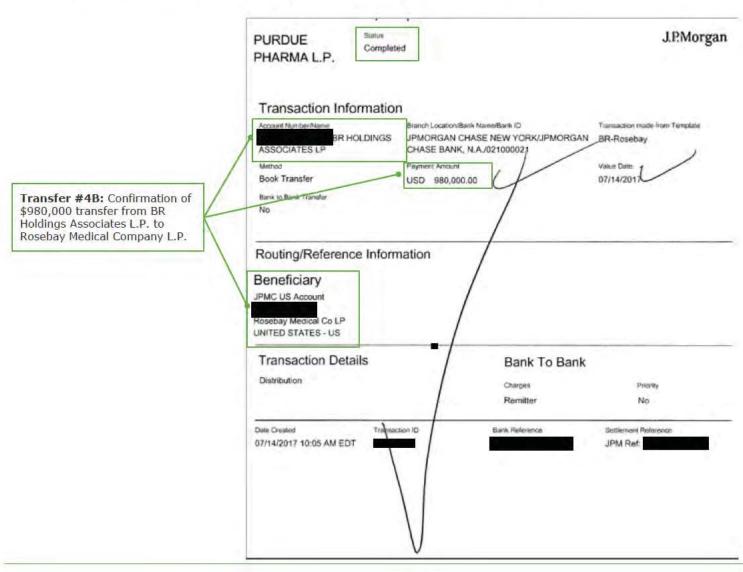
Purdue Pharma L.P. ("FPLP") Written Consent of General Partner authorizing PPLP to distribute \$1,969,729 to PHLP; PHILP Written Consent of General Partner authorizing PHLP to distribute \$4,875 to Purdue Pharma Inc., \$4.854 to PLP Associates Holdings Inc. and \$1,960,000 to PLP Associates Holdings L.P.; PLP Associates Holdings L.P. Written Consent of General Partner authorizing PLP Associates Holdings L.P. to distribute \$1,960,000 to BR Holdings Associates L.P. ("BR Holdings"); BR Holdings Written Consent of General Partner authorizing BR Holdings to distribute \$980,000 to Beacon Company and \$980,000 to Rosebay Medical Company L.P. (each of Beacon Company and Rosebay Medical Company L.P., will in turn contribute these amounts to RSJ Company); PPLP Written Consent of General Partner authorizing PPLP to distribute \$17,640,000 to PPLP; PHLP Written Consent of General Partner authorizing PHLP to contribute \$17,640,000 to RSJ Company, RSI Company Written Consent of General Partner authorizing RSI Company to contribute \$19,600,000 to Mundipharma Japan (as noted above the remaining \$400,000 will be contributed to Mundipharma Japan by the On the basis of the foregoing please proceed as follows: Distribute the funds up into Beacon Company and into Rosebay Medical Company L.P.; When RSJ Company receives the \$980,000 from Beacon Company and the \$980,000 from Rosebay Medical Company L.P., please arrange for the wire transfer from RSI Company in the amount of \$19,600,000 to the account of Mundipharma Japan as follows: Account Name: Mundipharma K.K. Bank Name: Sumitomo Mitsui Banking Corporation Branch Name: Hibiya Branch Type of Account: Saving (USD) SWIFT Code: Account Number: Separately I've written to to advise them to expect to receive their respective \$980,000 and to immediately transfer those funds to RSI Company upon receipt. Thanks for keeping me updated on the progress of the funding and advising when the final value date transfer is from RSI Company to Mundipharma Japan. Please note that we have been asked to fund these payments as soon as possible. Kind regards, The exist message and any etachments are for the exist use of the intended recipion(x). Any unsufferized events, use, disclosure, copying or distribution is probabled. If you are not the intended recipions, please commit the sendor by repty leman and dealiny afficiency of the original message and any attachments.

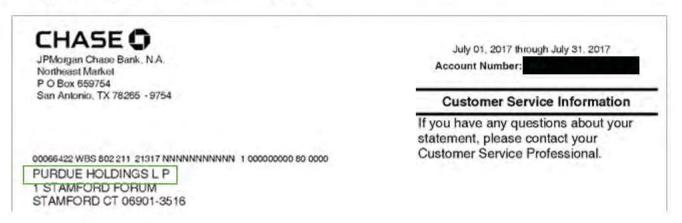
Transfers #2A, #2B, and #2C: Authorization for transfer from Purdue Holdings L.P. of \$1.96M, \$4,875, and \$4,854 to PLP Associates Holdings L.P., Purdue Pharma Inc., and PLP Associates Holdings Inc., respectively.

Transfers #4 and #5:
Authorization for transfers of \$980,000 from BR Holdings
Associates L.P. to each of
Beacon Company and Rosebay
Medical Company L.P., and
subsequent transfers of
\$980,000 from each of Beacon
Company and Rosebay Medical
Company L.P. to RSJ Company
L.P.

**Transfer #8:** Authorization and wire instructions for \$19.6M transfer from RSJ Company L.P. to Mundipharma KK.

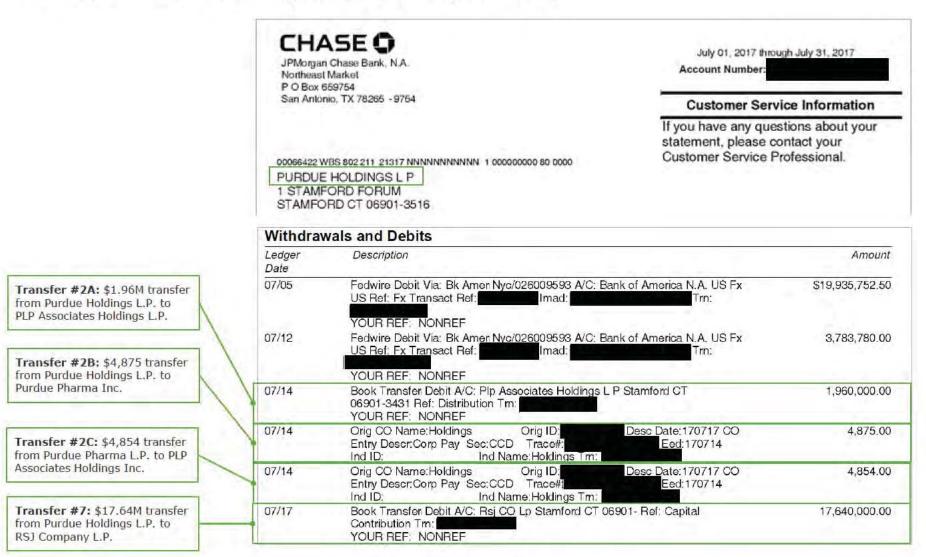


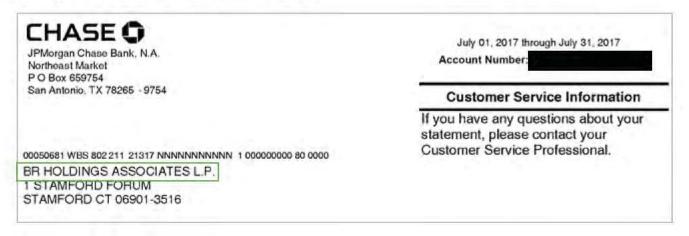




	Deposits and Credits		
	Ledger Date	Description	Amount
	07/05	Book Transfer Credit B/O: Purdue Pharma L P Stamford CT 06901-3516 Ref: Distribution Trn: YOUR REF: ATS OF 17/07/05	\$19,935,752.50
	07/07 07/12	Deposit  Book Transfer Credit B/O: Purdue Pharma L P Stamford CT 06901-3516 Ref: Distribution Tm: YOUR REF: ATS OF 17/07/11	103,997.59 3,783,780.00
Transfer #1: \$1.969M transfer from Purdue Pharma L.P. to Purdue Holdings L.P.	07/14	Book Transfer Credit B/O: Purdue Pharma L P Stamford CT 06901-3516 Ref: Distribution Trn: YOUR REF: ATS OF 17/07/14	1,969,729.00

Deposits and Credits (continued) Description Ledger Amount Date Book Transfer Credit B/O: Purdue Pharma L P Stamford CT 06901-3516 Ref: 17,640,000.00 Transfer #6: \$17.64M transfer 07/17 from Purdue Pharma L.P. to Distribution Trn: Purdue Holdings L.P. YOUR REF: ATS OF 17/07/14





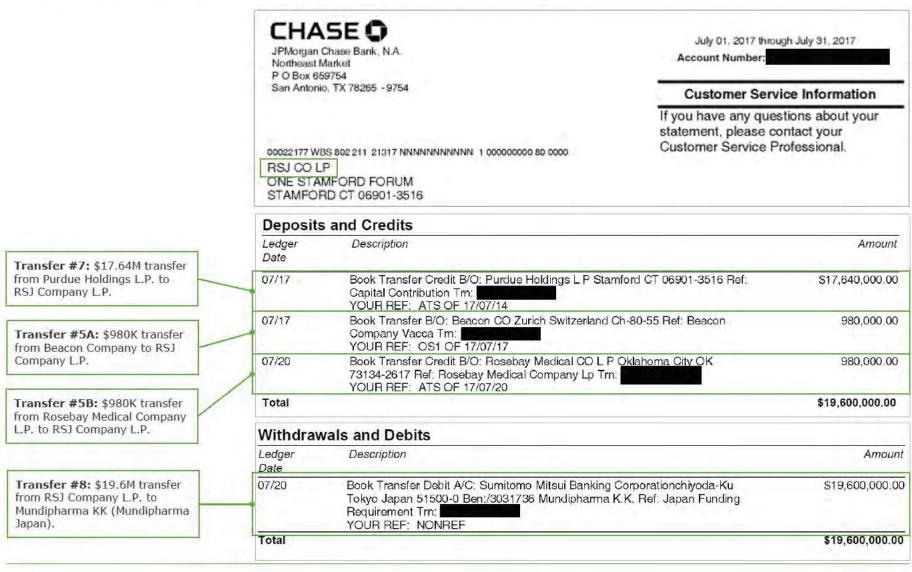


**Transfer #3:** \$1.96M transfer from PLP Associates Holdings L.P. to BR Holdings Associates L.P.

**Transfer #4B:** \$980,000 transfer from BR Holdings Associates L.P. to Rosebay Medical Company L.P.

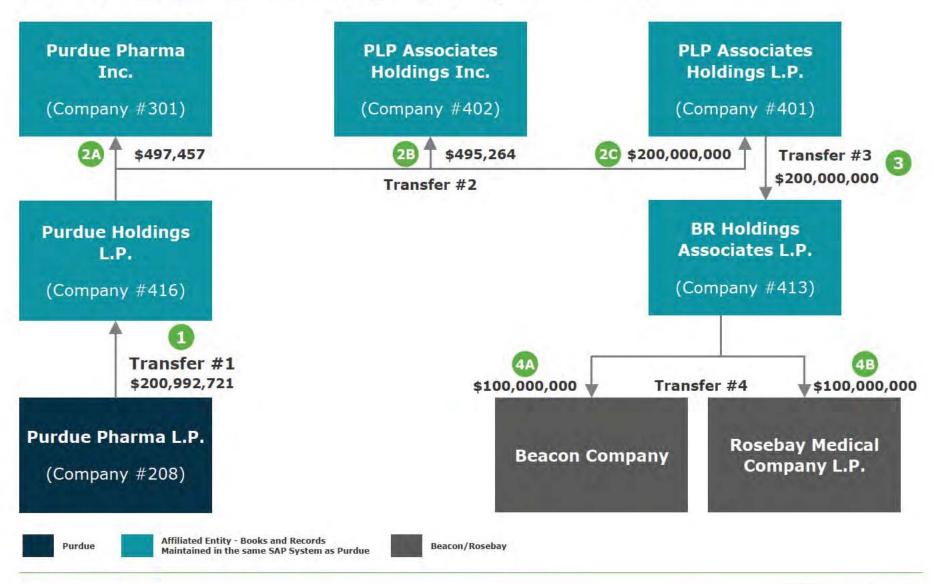
**Transfer #4A:** \$980,000 transfer from BR Holdings Associates L.P. to Beacon Company.

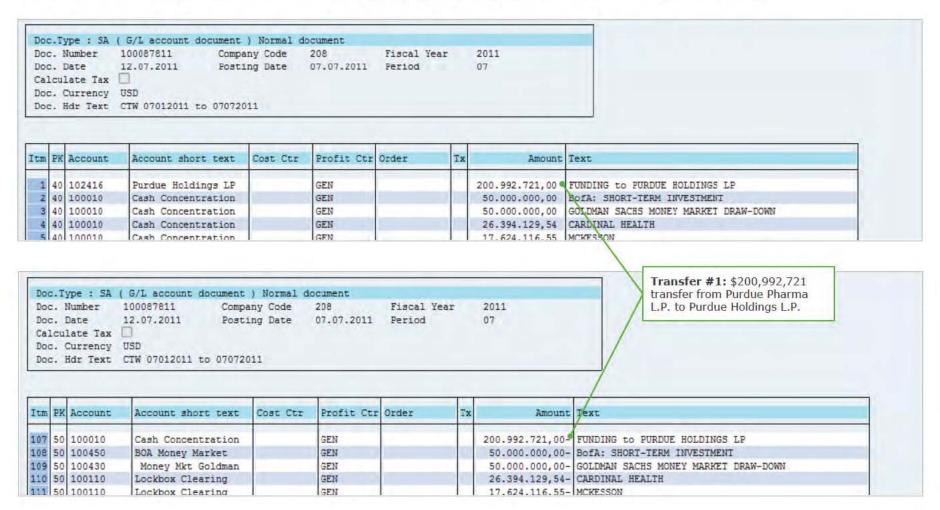
Withdrawals and Debits			
Ledger Date	Value Date	Description	Amount
07/14		Book Transfer Debit A/C: Rosebay Medical CO L P Oklahoma City OK 73134-2617 Ref: Distribution Trn: YOUR REF: NONREF	\$980,000.00
07/14		Book Transfer Debit A/C: Beacon CO Zurich Switzerland Ch-80-55 Ref: Distribution Trn: YOUR REF: NONREF	980,000.00

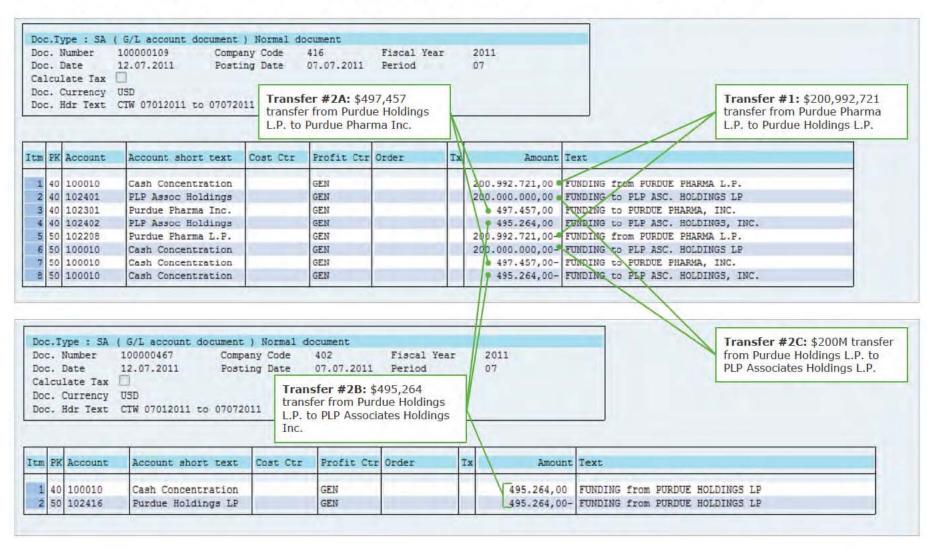


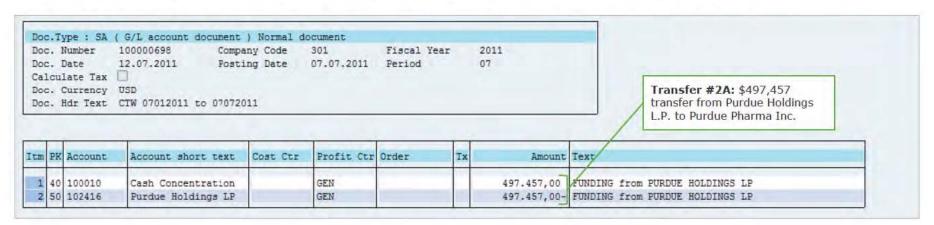
#### **Alix**Partners

# Selection 7 Purdue US Partner Cash Distributions (2011)

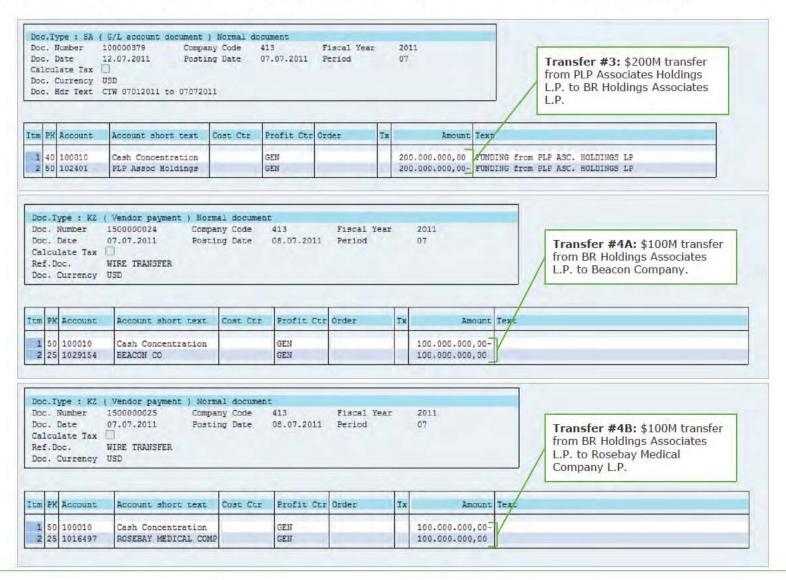


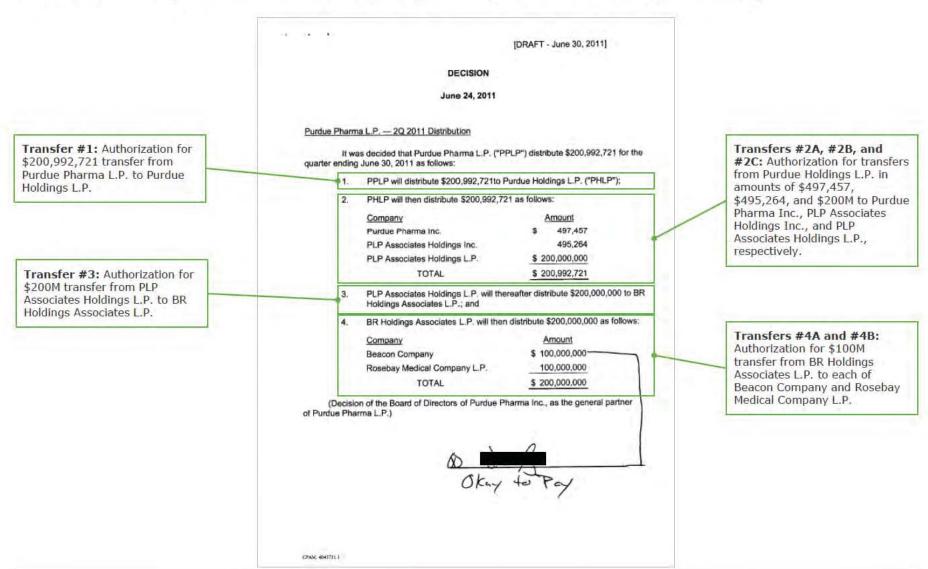






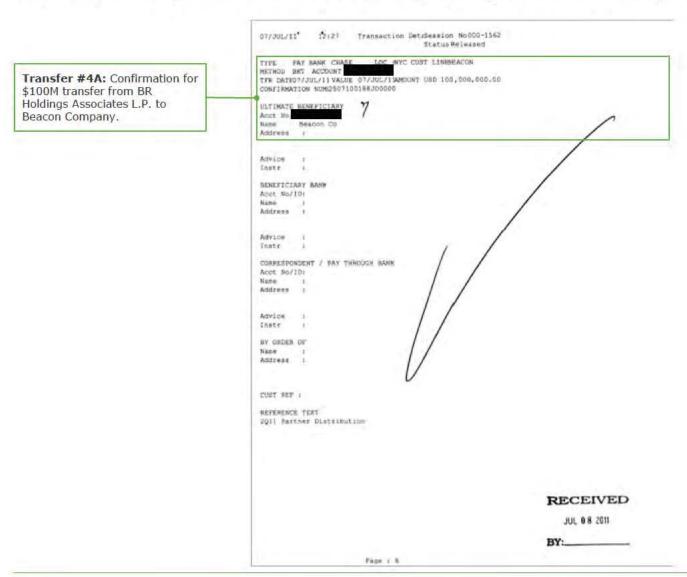


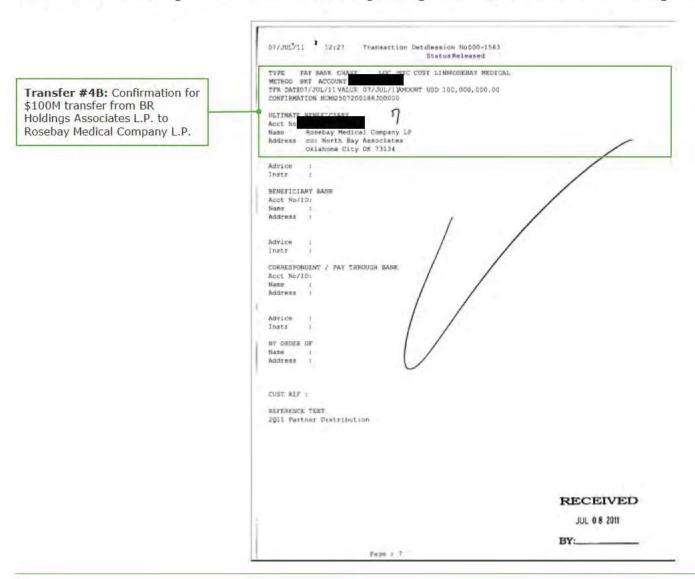




	PURDUE
	WIRE TRANSFER REQUEST
	DATE: 6-3:1-2011 Bank Acet Name: JPMorganChase
	ACCOUNTS PAYABLE USE ONLY FROM CO. NAME: BR Holdings Associates LP Gans Acce Number:
	PAYMENT DUE DATE:
	TOTAL SPRINGER SEN. STREET ACCRESS.
	The de not process the Niles Colly, SCATE_COL
nsfer #4A: Authorization \$100M transfer from BR	NEOPERT DAM AND JPMorganChase
dings Associates L.P. to	1029154 BANK STREET ADDRESS. 1411 AVE OF THE AMERICAS
con Company.	SITY, STATE, 28th New York, NY 10041
	NVOICE NO. / FO NO ACCOUNT NUMBER.
	ASA NUMBER: 021000021
	SAP DOCUMENT REGISTED BY MARKETS
	TOTAL WINE 100,000,000.00
	AMERIT DESCRIPTION. 2011 Pariner Distribution
	6998 TRANSPER Required Company Enganeshus/Coet (under/Wes/Product) DOCUMENT MUNICIPAL
	04 Dec 415-000044 1 Amount 5 166,006,606.00
	100000060 max 1 10000000
	Accounts between 1 100, 000 Ft and 8000, 000 require size A of 8 Orong Signer  Amounts over \$10,000,000 require more signer from each group  Amounts over \$1,000,000 pt, one of the signers must be an EVP  (EVP), John Stewart, 8d Mahney, Devid Long, James Colon.  Crossy A Topae  Crossy & Topae  Crossy & Topae  Crossy & Topae  Crossy & Topae
	CHARLEY THE FULL ACCOUNTS PAVIS & REVIEW
	Reputation Name:    Description Name:   Descri

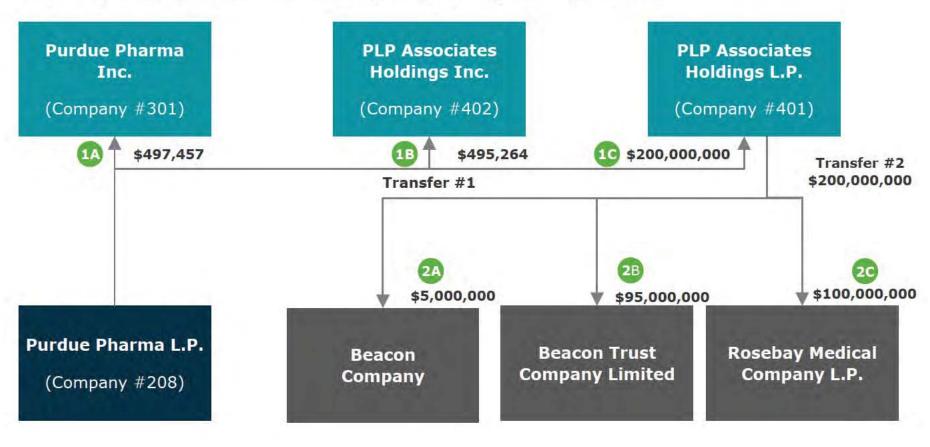
	- d - d
	"FOR" DATE: 6-Jul-2011 Bank Aust Mann: JPMorganiChase
	ACCOUNTS PAYABLE USE ONLY FROM CO. NAME: BIR Holdings Associates LP Bank Acet Number:
	SAP PAYMENT DUE DATE  PAYER YEDGOR NAME. Rosebby Medical Company LP
	STREET ASSAURCE  GO NOTE Bay Associates  Go Note: Bay Associates  Go Note: Bay Associates  Con Control on Cont
ansfer #4B: Authorization \$100M transfer from BR	ESCREET SANK MARE JPMorgan/Chase
Idings Associates L.P. to	1016497 BAAK STREET ADDRESS: 55 Water Street
sebay Medical Company L.P.	MYDICE NO! PO NO.: OFF, STATE, 29: New York, NY 10005
	ACCOUNT MARKER.
	ABA WAMBER 021000021
	MANAGERS: TOTAL WAR
	TRANSPER AMOUNT \$ 100,000,000.00
	PAYMENT DESCRIPTION: 2011 Partner Distribution WHILE TRANSPER Required Company Supranticular Contembulations
	DOCUMENT NUMBER: 543-502044 \$ Amount \$ 100,000,000
	(ACCOUNTS ALSO
	NOTE: Whe Transfer Amounts have than \$100,000.01 do not require on self-ordered eignatury (below) Amounts between \$ 100, 000.01 and \$500, 000 require sen & not B Onsign Signar Amounts over \$500, 500 require one signar from each group  Amounts over \$500,000.01, one of the algiest must be an EVP  (EVP) John Sewent, Et Machany,
	Small A Spore
	Check Manual A
	Orace S Superior States
	TREASURY USE ONLY
	CHEST SAL 7 TVL
	TREASURY USE ONLY
	Created By SAC 7 TVL  ADDRESS BY SAC STATE REVIEW ADDRESS BY SACRED BY EXT THE BURGAN MEDICAL MEDICAL STATE BY SACRED BY EXT THE BURGAN MEDICAL MEDICAL STATE BY SACRED BY SACRE
	Council By SAL 7 SVL  Apparent By SAL 7 SVL
	TREASURY USE ONLY  Approved By:  Approved By



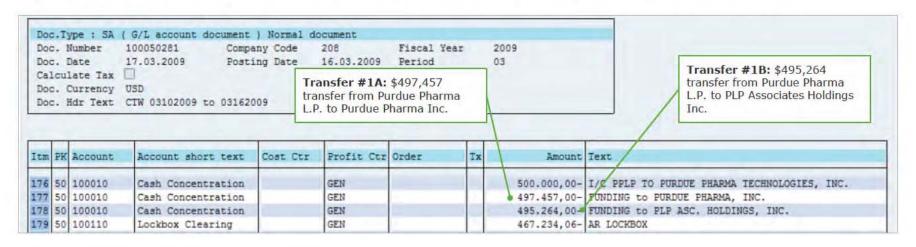


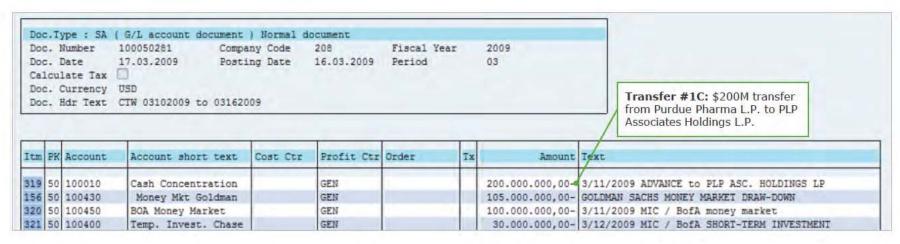
#### **Alix**Partners

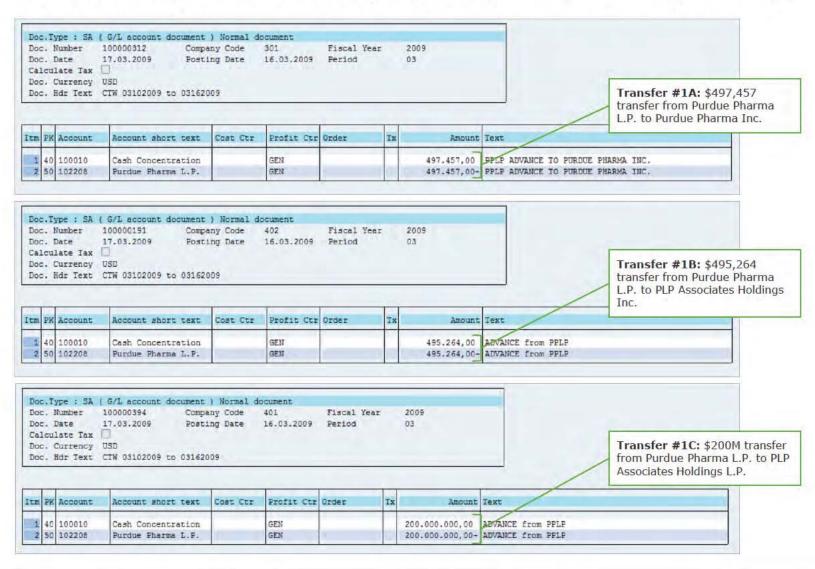
# Selection 8 Purdue US Partner Cash Distributions (2009)

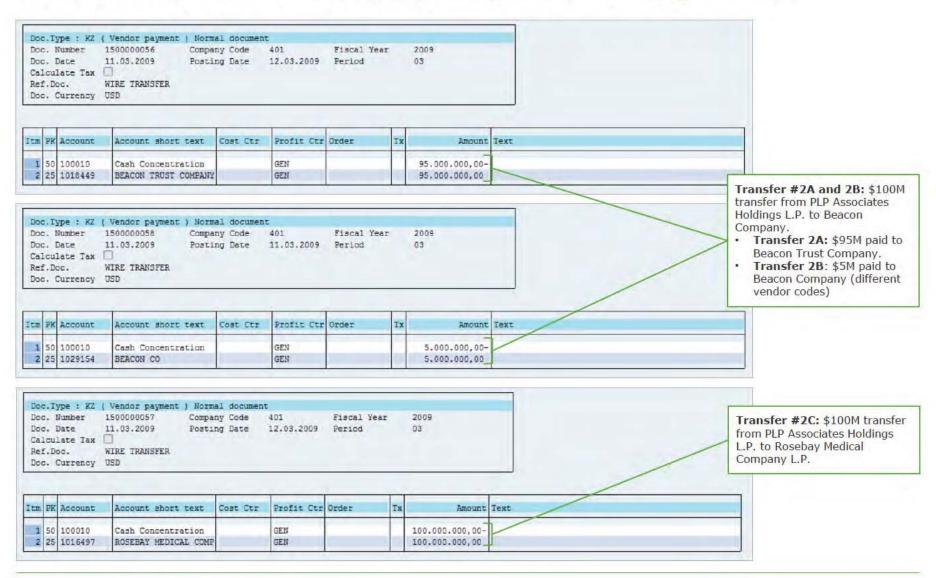


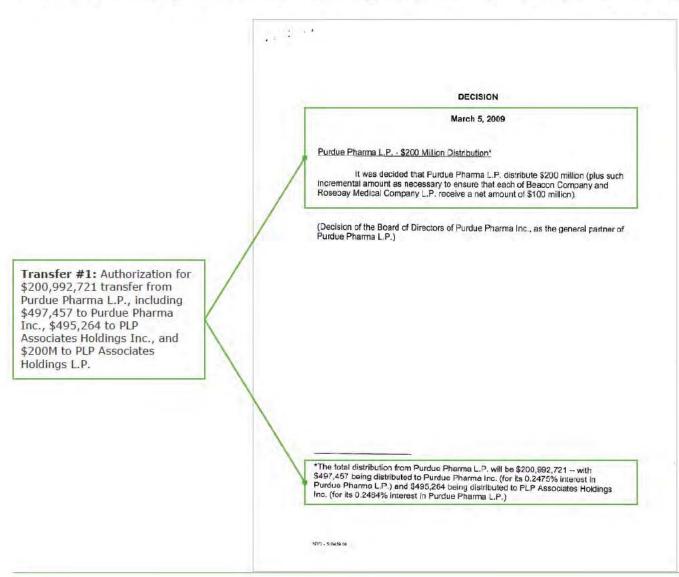




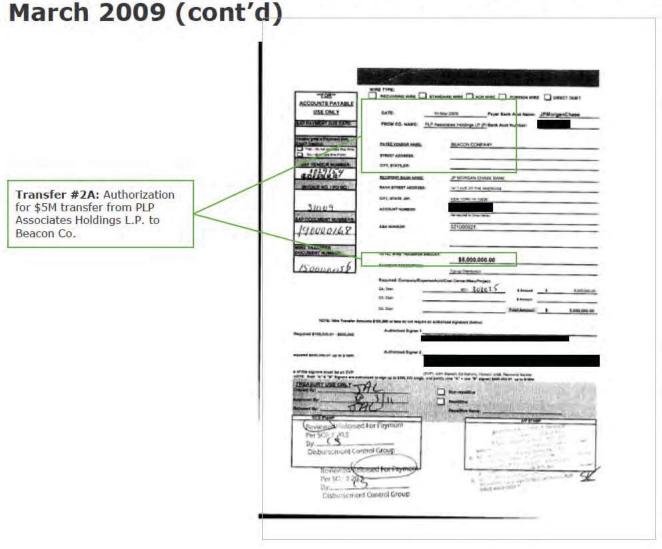








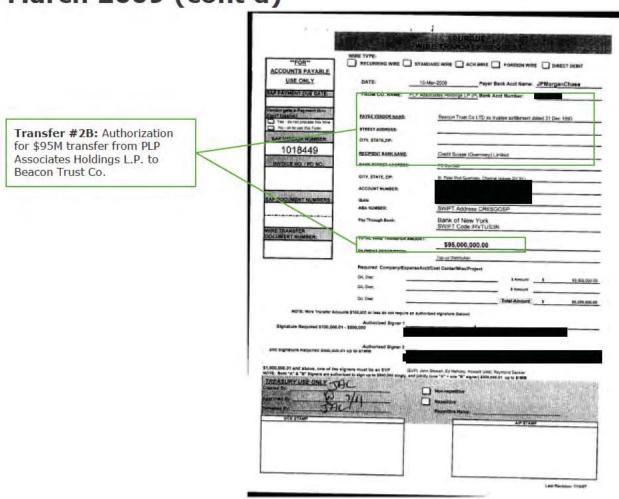
Selection 8 – US Partner Cash Distribution to Beacon Company, Beacon Trust Co. Limited and Rosebay Medical Company L.P.,



Selection 8 – US Partner Cash Distribution to Beacon Company, Beacon Trust Co. Limited and Rosebay Medical Company L.P.,

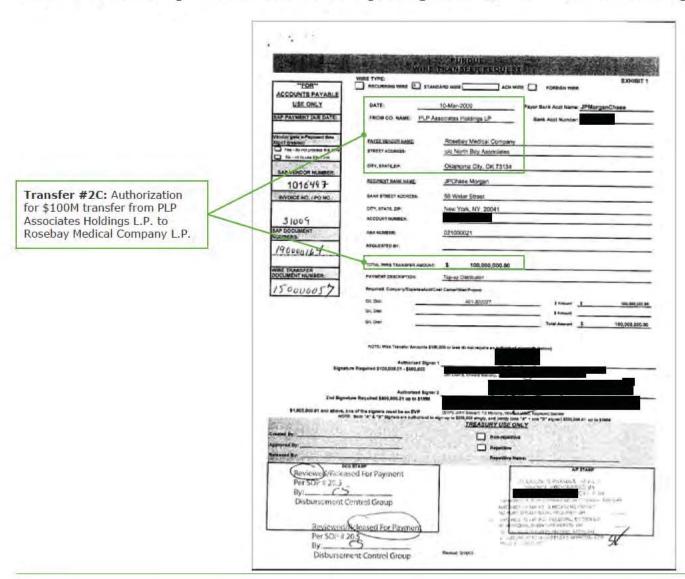
March 2009 (cont'd) 11/MAR/09 09:42 Transaction CSession 00-4865 StatuReleased TYPE PABANCHASE LOCKYCUST LINE: METHIBITACCO TFR D.11/MARVALL11/MAFAMOLUS5,000,000.00 CONFIRMATI0876600070J00000 Transfer #2A: Confirmation of Acct No. \$5M transfer from PLP Name BEACON COMPANY Associates Holdings L.P. to Address : Beacon Co. Advice Instr : BENEFICIARY BANK Acct No/ID: Name Jpmorgan Chase Bank AddressNew York Ny 10004 Advice : Instr : CORRESPONDENT / PAY THROUGH BANK Acct No/ID: Name Address Advice : instr BY ORDER OF Name Address CUST REF : REFERENCE TEXT **IPRIORITY!** 

Selection 8 – US Partner Cash Distribution to Beacon Company, Beacon Trust Co. Limited and Rosebay Medical Company L.P., March 2009 (cont'd)



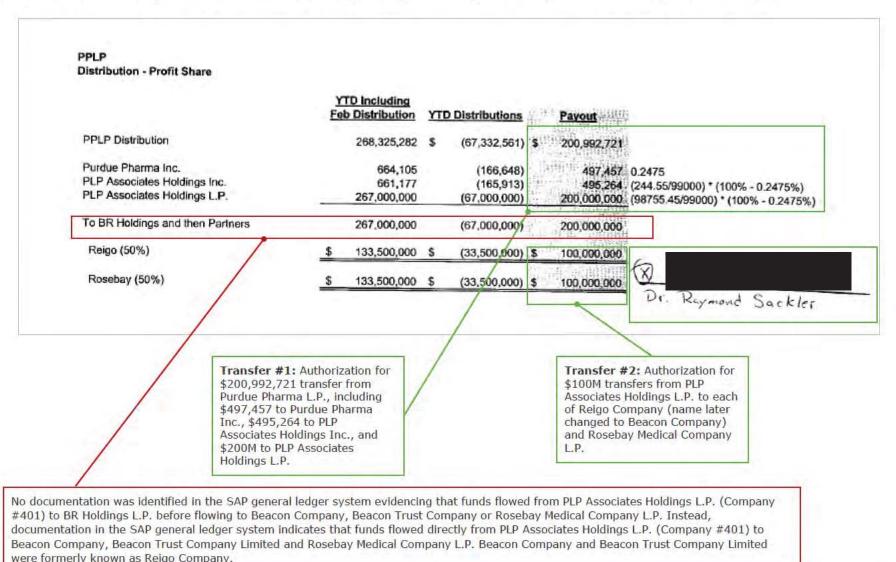
Selection 8 – US Partner Cash Distribution to Beacon Company, Beacon Trust Co. Limited and Rosebay Medical Company L.P., March 2009 (cont'd)

11/MAR/09 09:42 Transaction ESession 00-4866 StatuReleased TYPE PABANCHASE LOCNYCUST LINE: METHICHFACCO020910355 TFR D.11/MARVALL11/MAFAMOLUS#5,000,000.00 CONFIRMATI0876700070J00000 Transfer #2B: Confirmation of ULTIMATE BENEFICIARY \$95M transfer from PLP Name BEACON TRUST LIMITED Associates Holdings L.P. to AddressAS TRUSTEE OF A SETTLEMENT DATED **31 DECEMBER 1993** Beacon Trust Co. Advice Instr BENEFICIARY BANK Acct No Name CREDIT SUISSE (GUERNSEY) LIMITED AddressPO BOX 358 ST PETER PORT GB GUERNSEY GY1 3YJ CHANNEL ISLANDS Advice Instr CORRESPONDENT / PAY THROUGH BANK Acct No. Name The Bank Of New York Mellon Address48 Wall St New York Ny 10005-2901 Advice Instr BY ORDER OF Name Address CUST REF REFERENCE TEXT ACCOUNT NO TAX PAID ACCOUNT



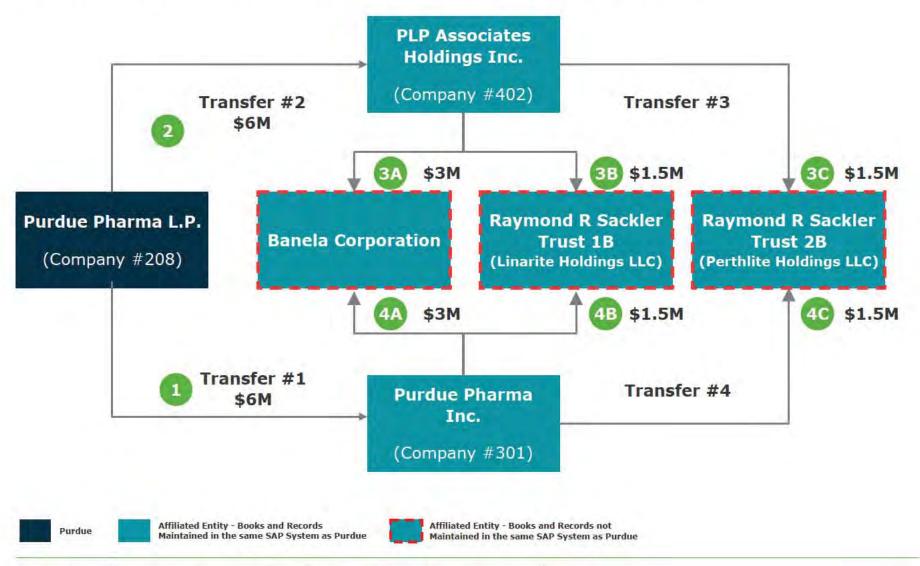
Transfer #2C: Confirmation of \$100M transfer from PLP Associates Holdings L.P. to Rosebay Medical Company L.P.

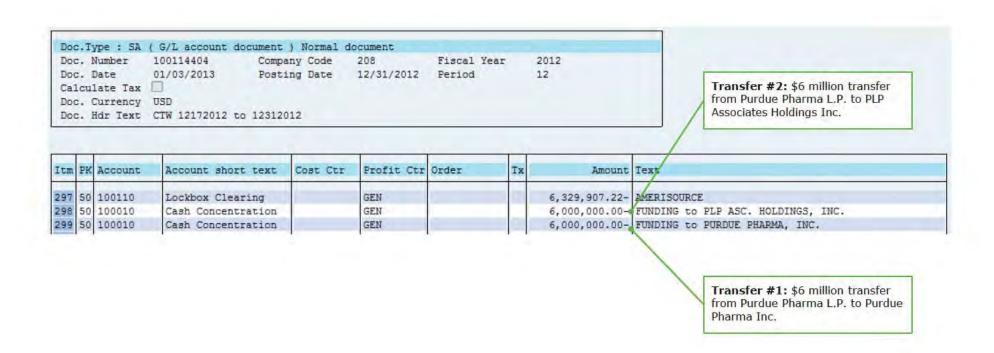


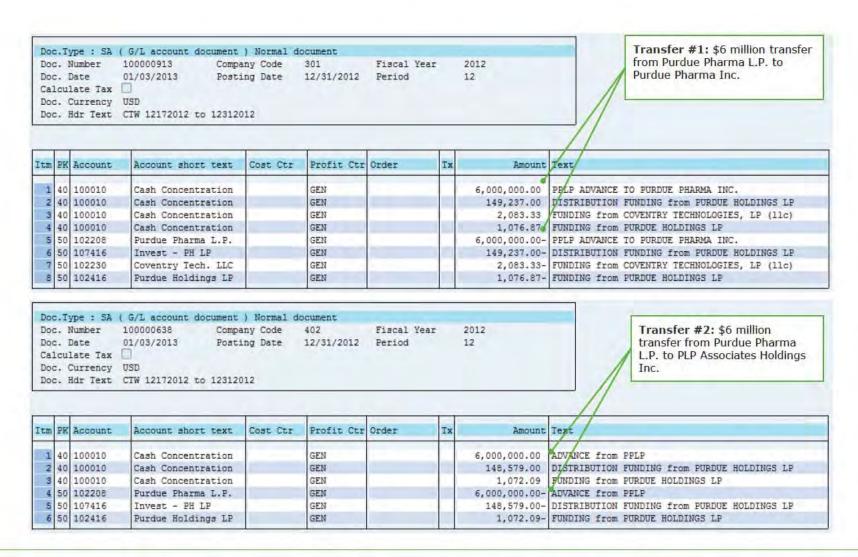


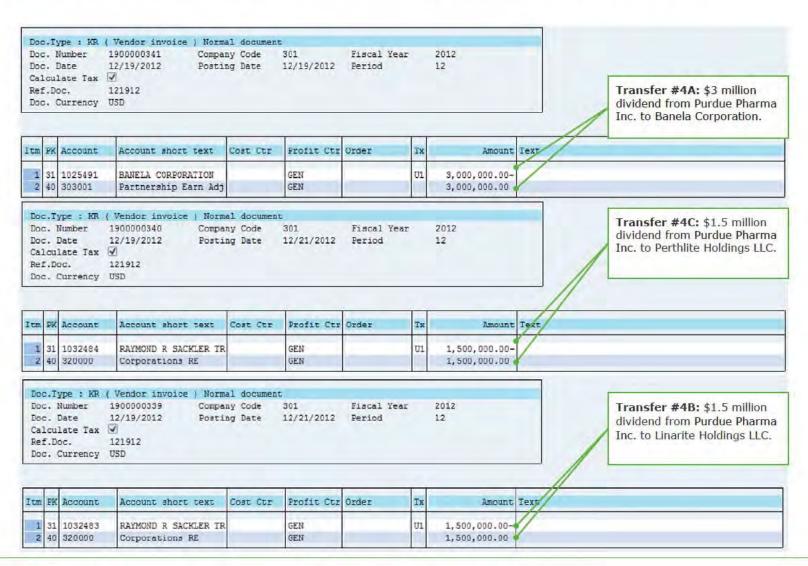
#### **Alix**Partners

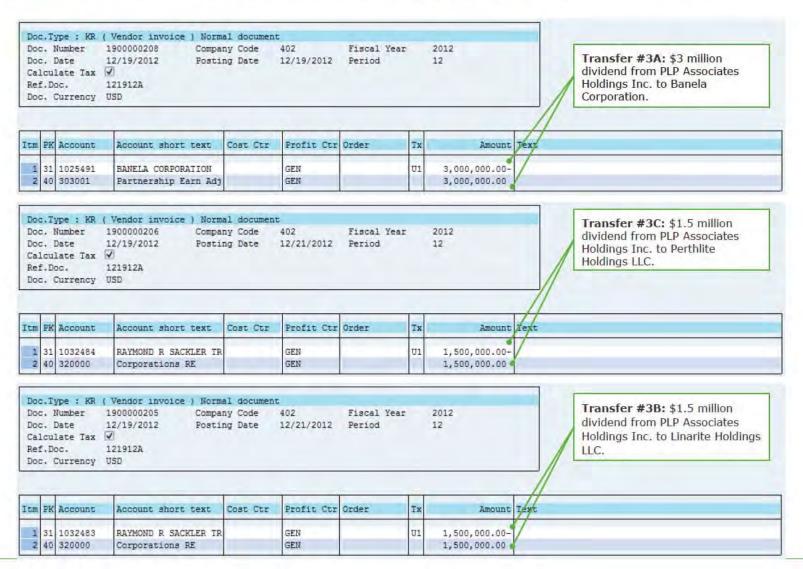
# Selection 9 Purdue US Partner Cash Distributions (2012)

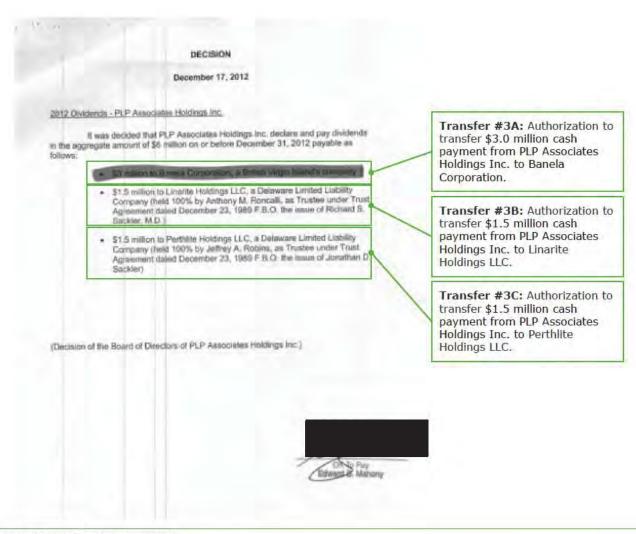


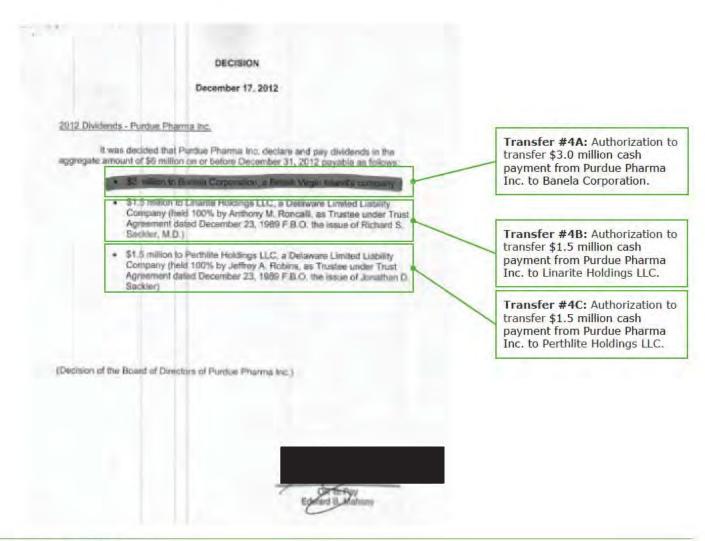










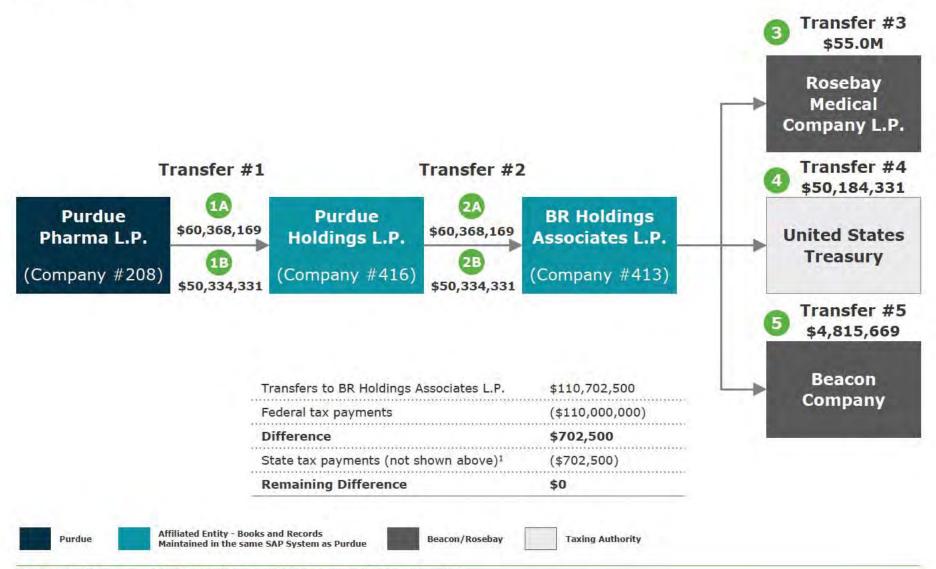


#### **Alix**Partners

#### **Purdue Tax Distributions**

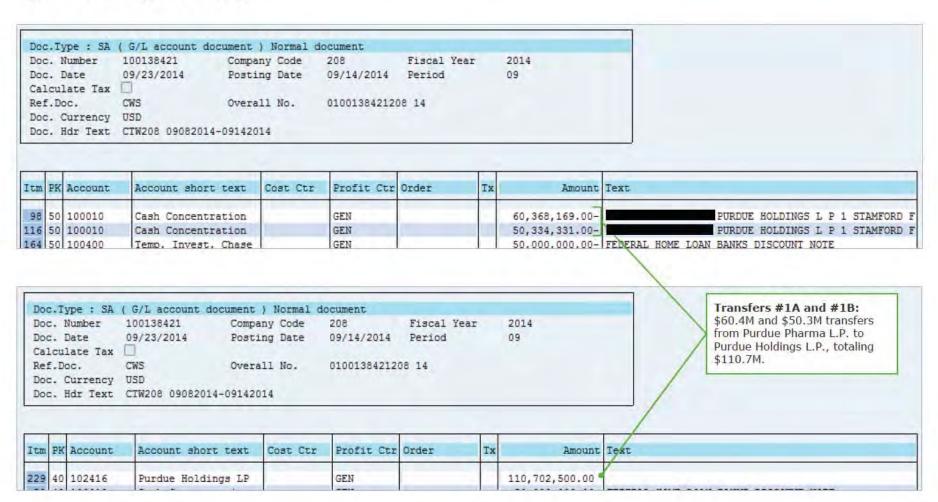
#### **Alix**Partners

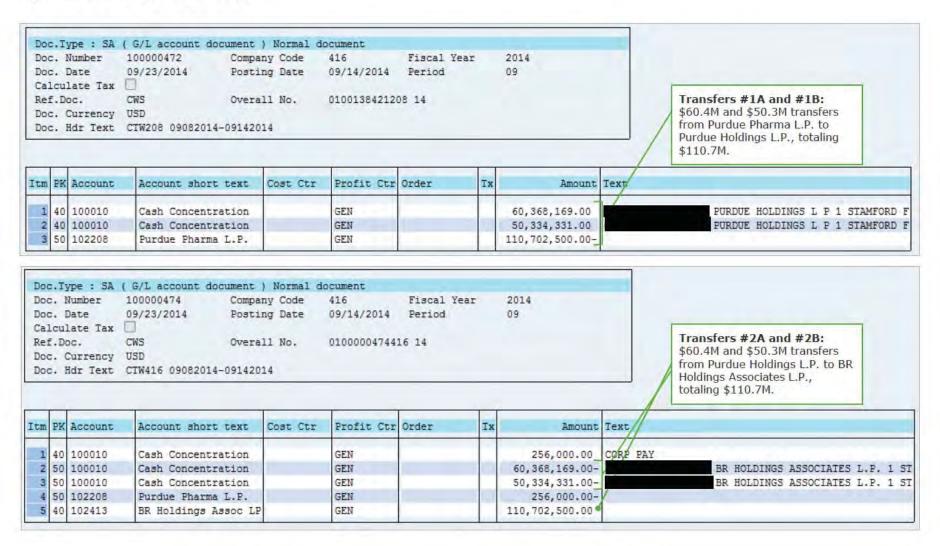
# **Selection 10 Purdue Tax Distributions** (2014)

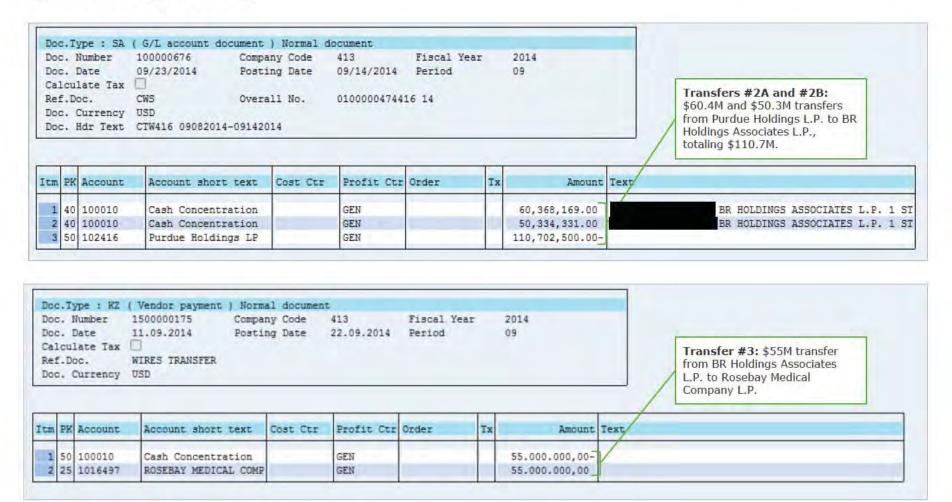


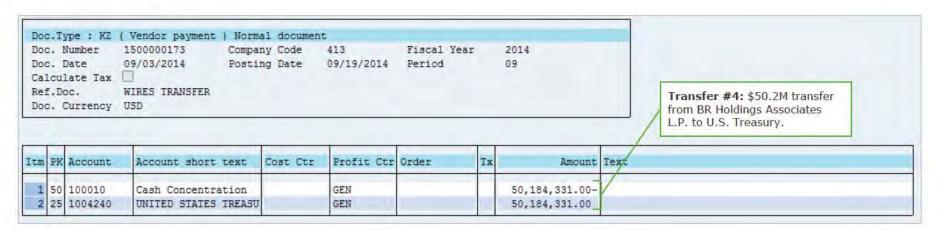
<sup>&</sup>lt;sup>1</sup> State and other federal tax payments identified in Purdue's Internal Distribution Analysis and SAP General Ledger detail.

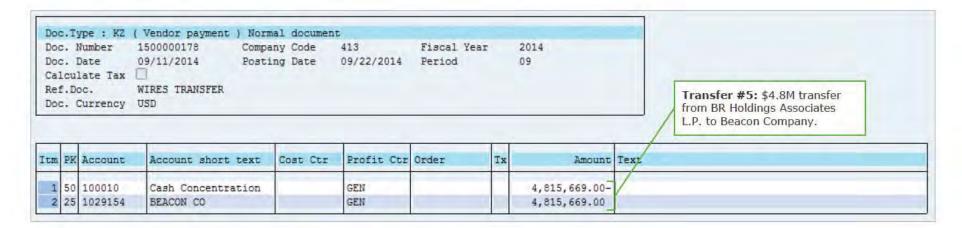
We are unable to determine from the books and records maintained by Purdue whether Rosebay Med cal Company L.P. or Beacon Company used the distributions to make tax-related payments to the appropriate taxing authorities. Under IRC Section 1446, BR Holdings Associates L.P., is required to withold taxes on behalf of its foreign partner, Beacon Company. The \$4,815,669 Tax Distribution to Beacon Company related to Medicare taxes. Under IRC Section 1446, the witholding agent is not required to withold the 3.8% Medicare tax to remit to the US Treasury.

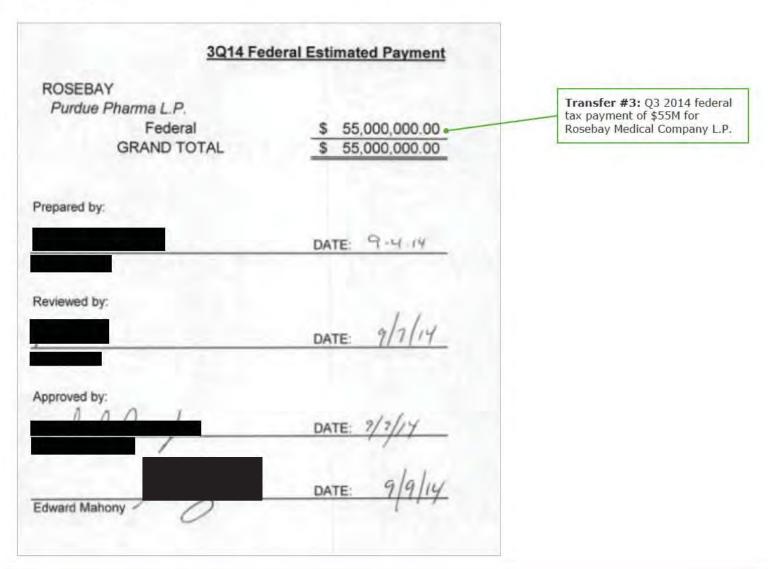


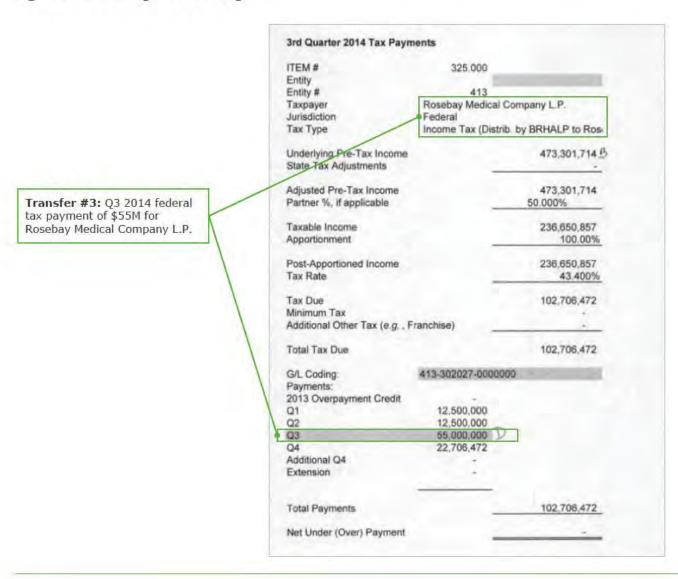


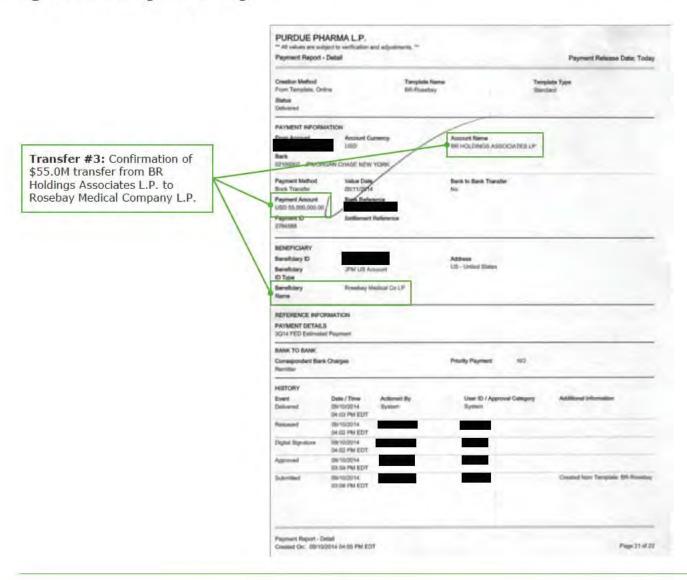


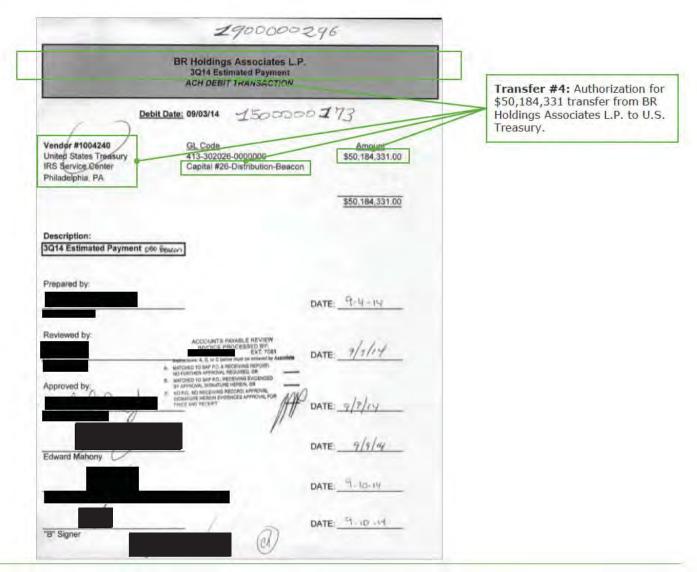


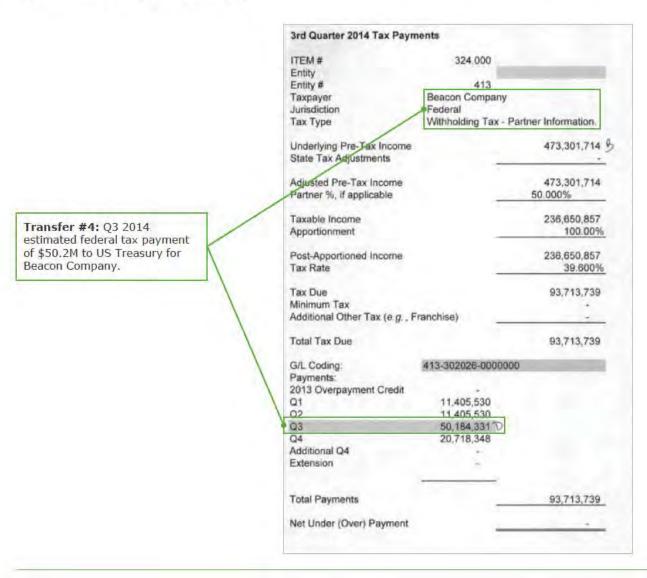






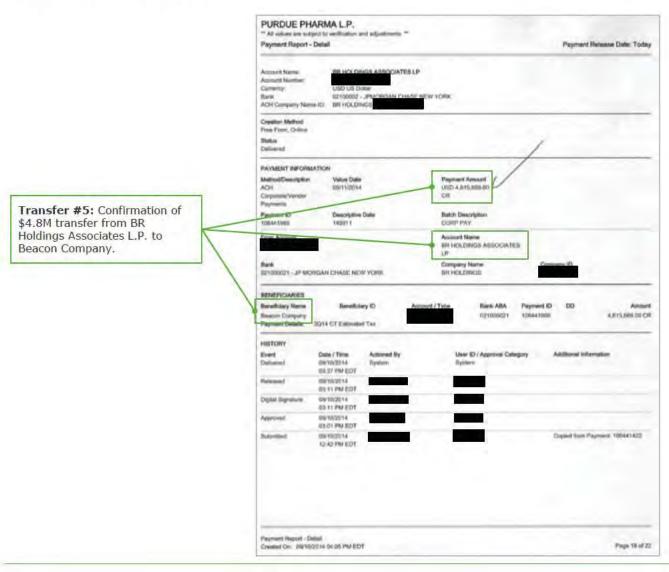


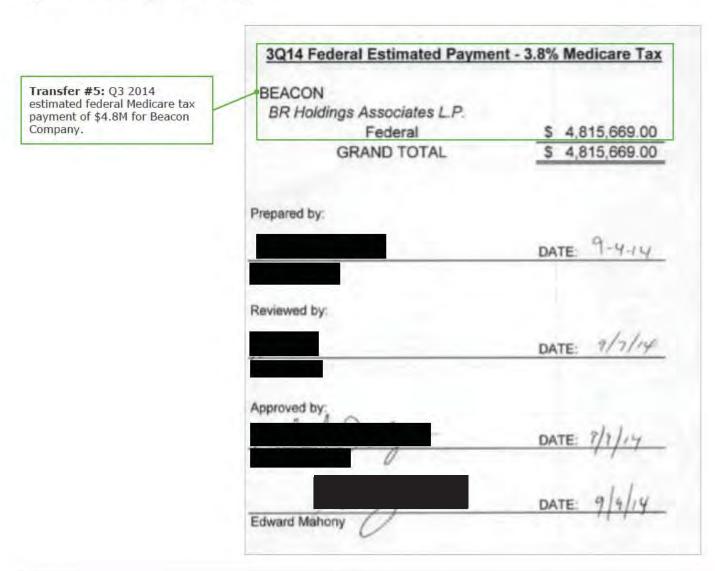


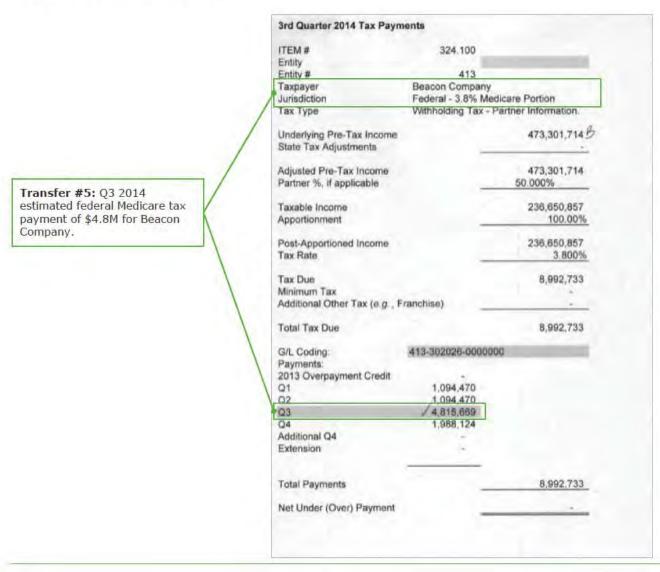


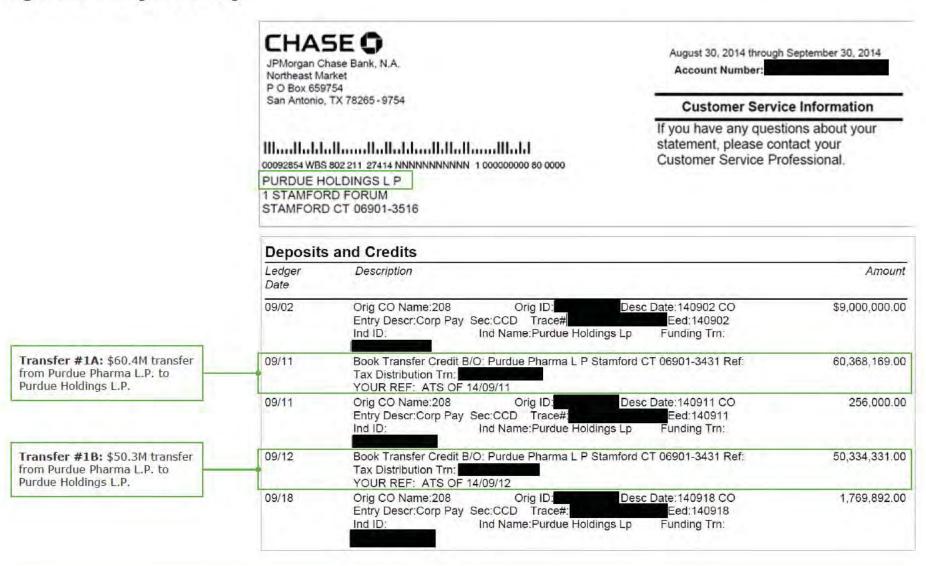


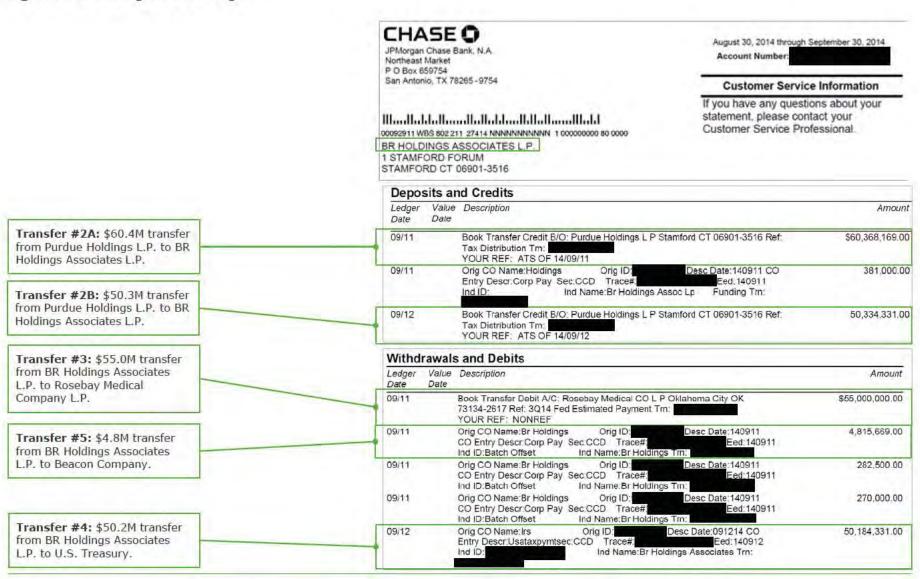
Transfer #4: Confirmation of \$50.2M payment for Q3 2014 federal tax from BR Holdings Associates L.P. to the US Treasury on behalf of Beacon Company.







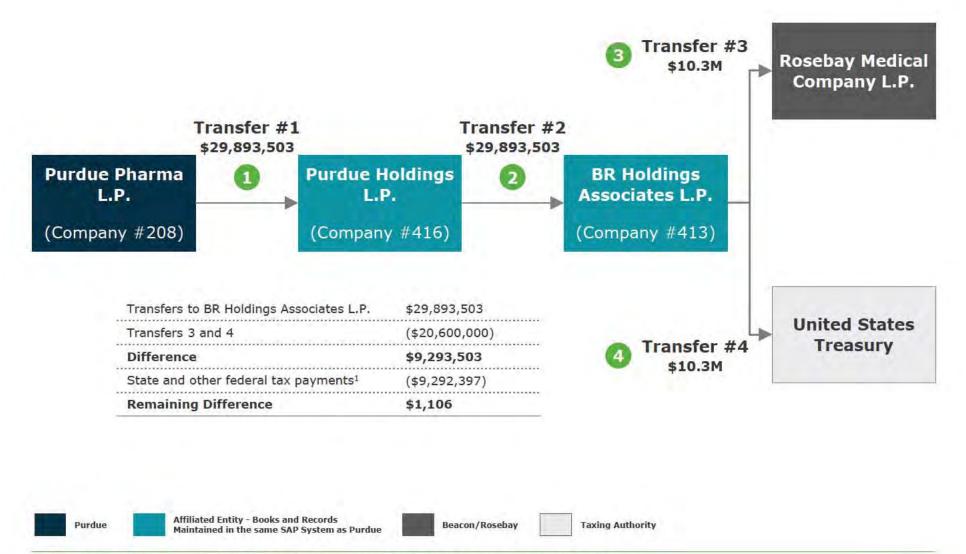




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# **Selection 11 Purdue Tax Distributions** (2016)

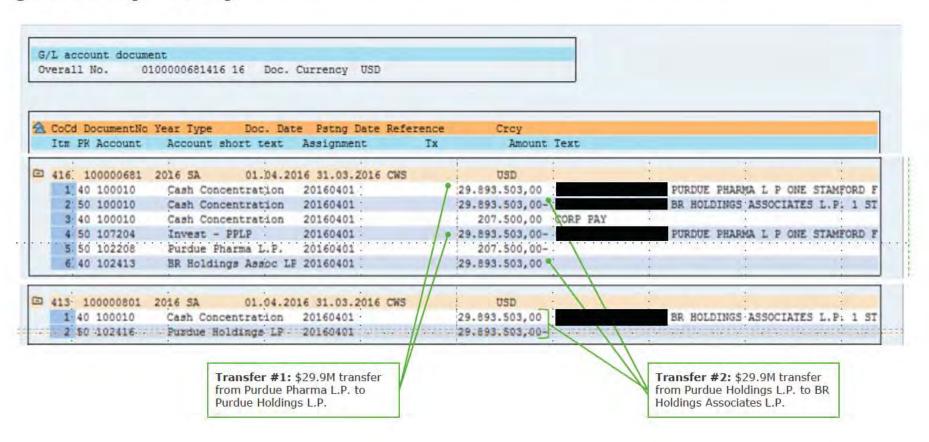
### Selection 11 - Tax Distribution for estimated federal tax payment, Q1 2016

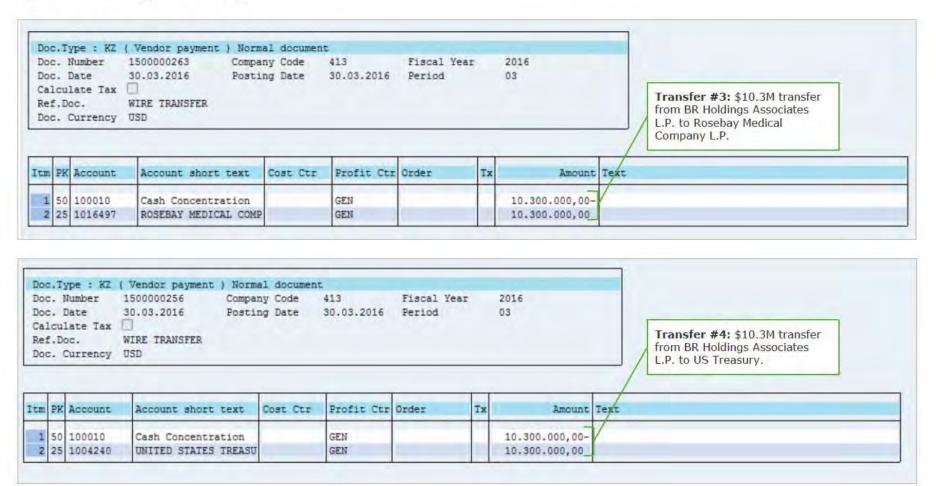


<sup>&</sup>lt;sup>1</sup> State and other federal tax payments identified in Purdue's Internal Distribution Analysis and SAP General Ledger detail.

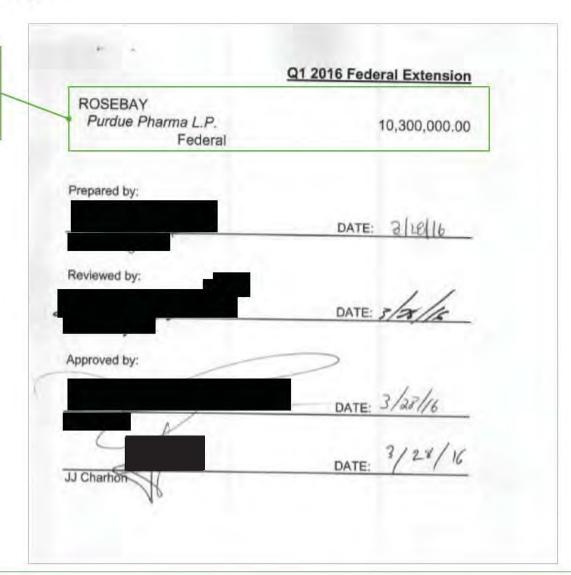
We are unable to determine from the books and records maintained by Purdue whether Rosebay Medical Company L.P. used the distributions to make tax-related payments to the appropriate taxing authorities.

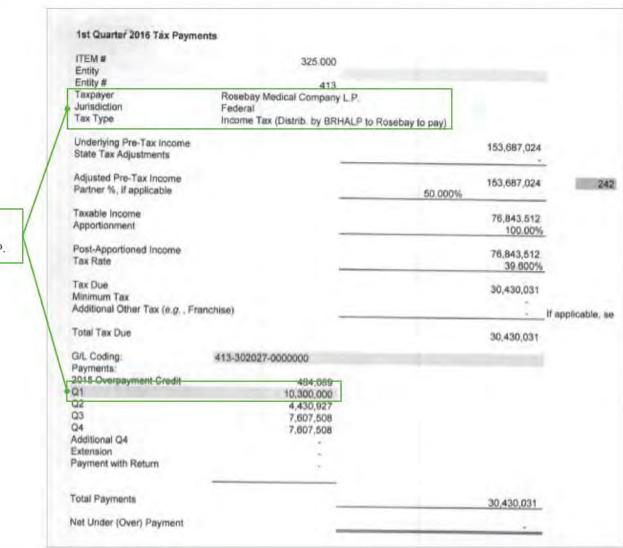




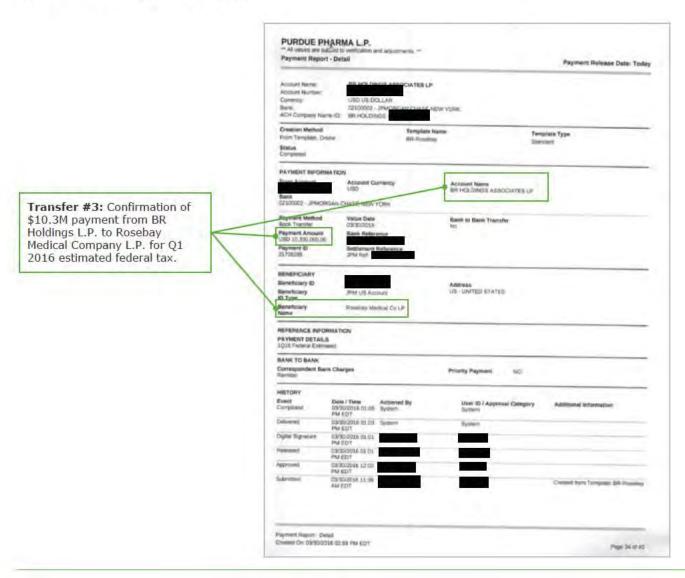


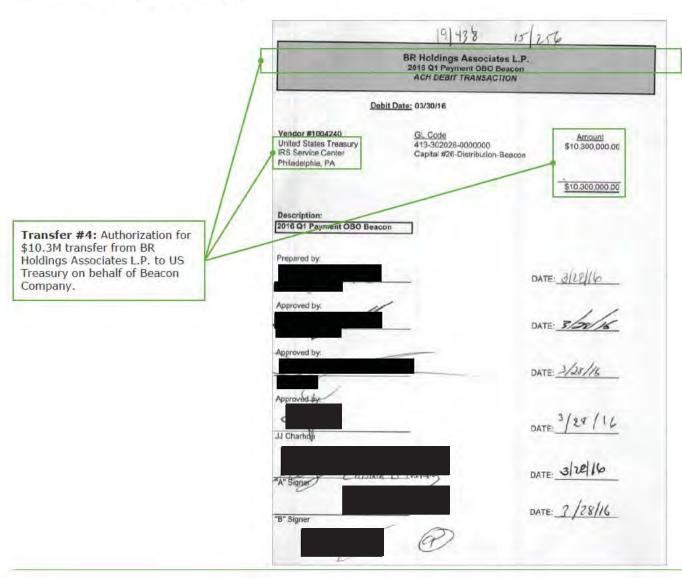
Transfer #3: Authorization for \$10.3M payment from BR Holdings Associates L.P. to Rosebay Medical Company L.P. for Q1 2016 estimated federal tax.

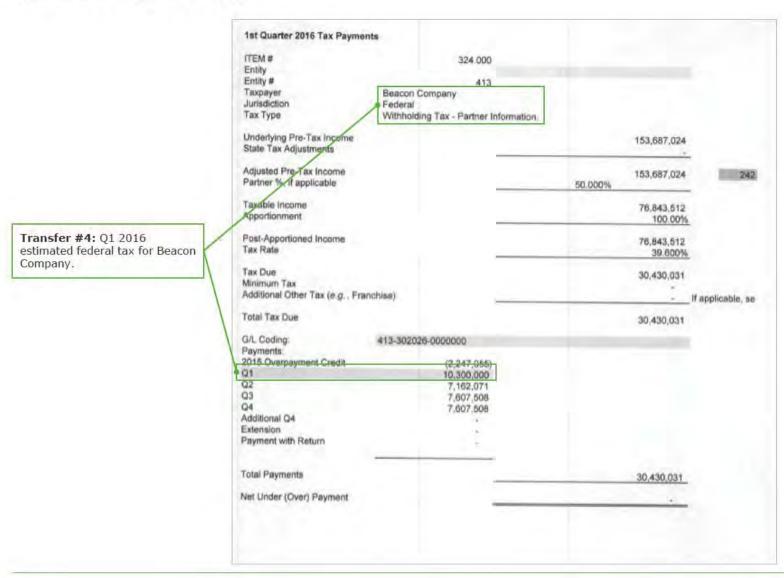




**Transfer #3:** Q1 2016 estimated federal tax for Rosebay Medical Company L.P.



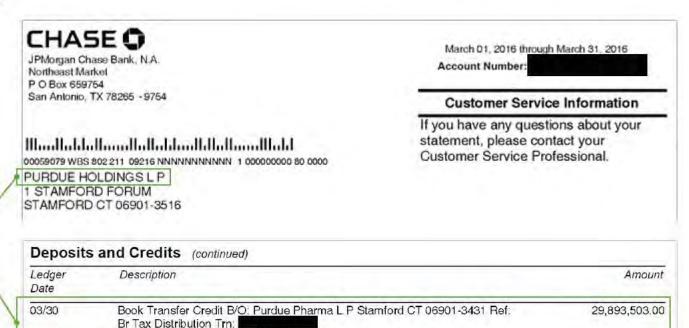




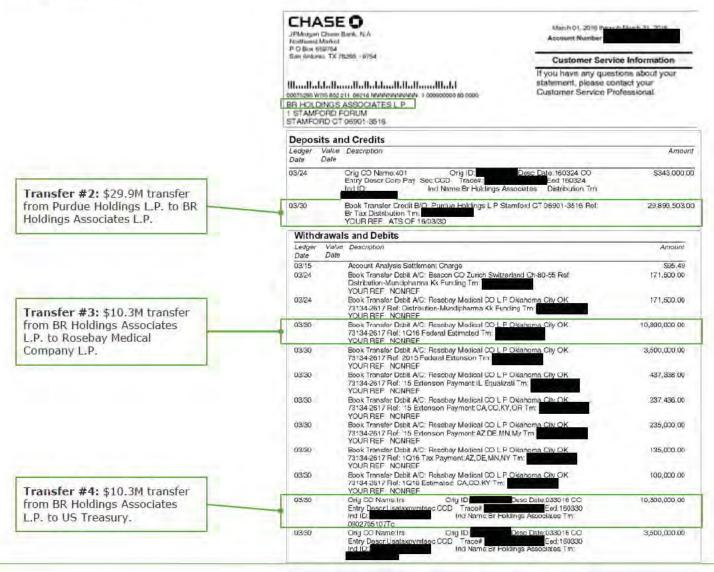


Transfer #4: Confirmation of \$10.3M 1Q16 Federal tax payment from BR Holdings Associates L.P. to US Treasury on behalf of Beacon Company.

YOUR REF: ATS OF 16/03/30

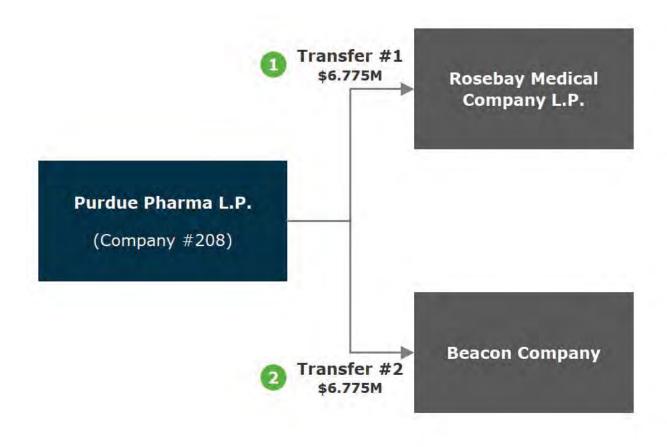


**Transfer #1:** \$29.9M transfer from Purdue Pharma L.P. to Purdue Holdings L.P.

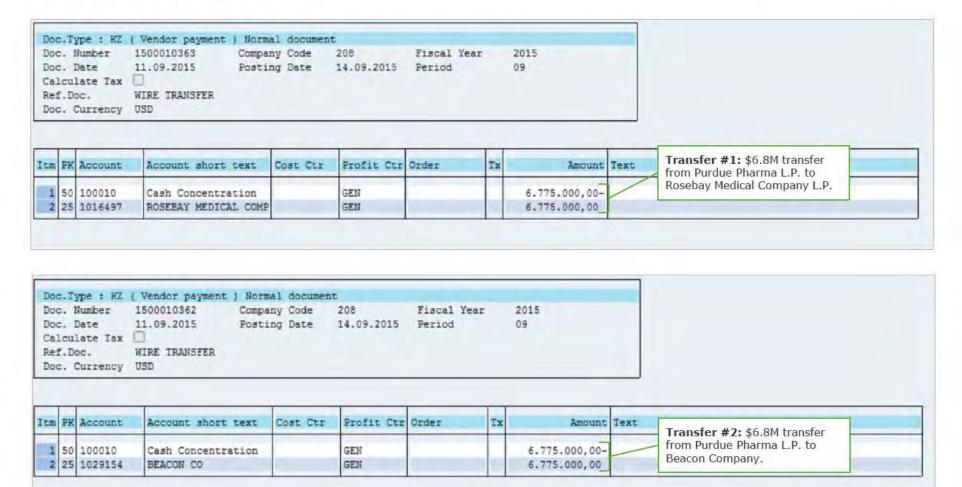


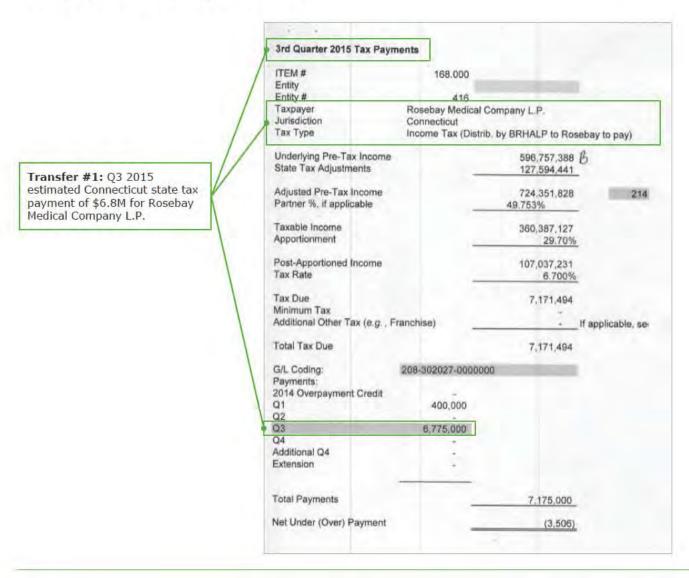
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# **Selection 12 Purdue Tax Distributions** (2015)





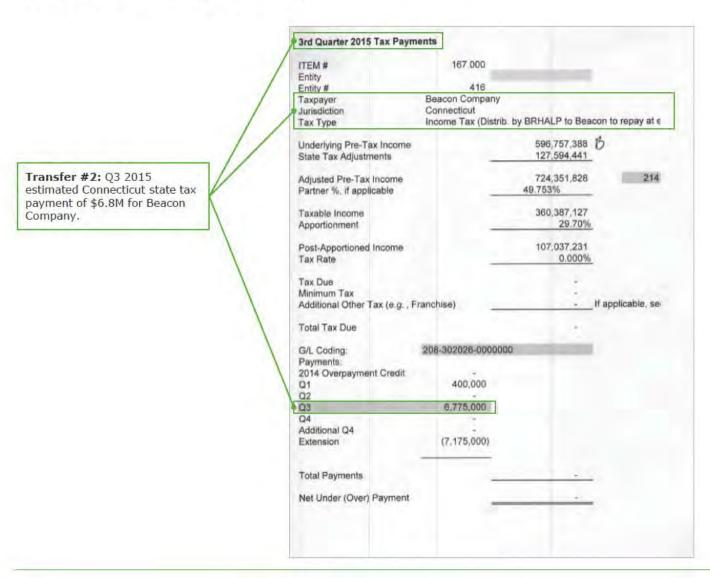


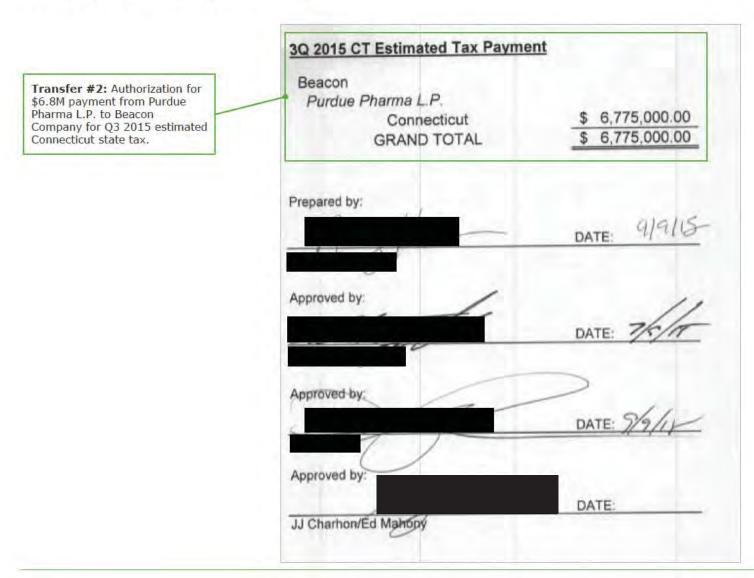


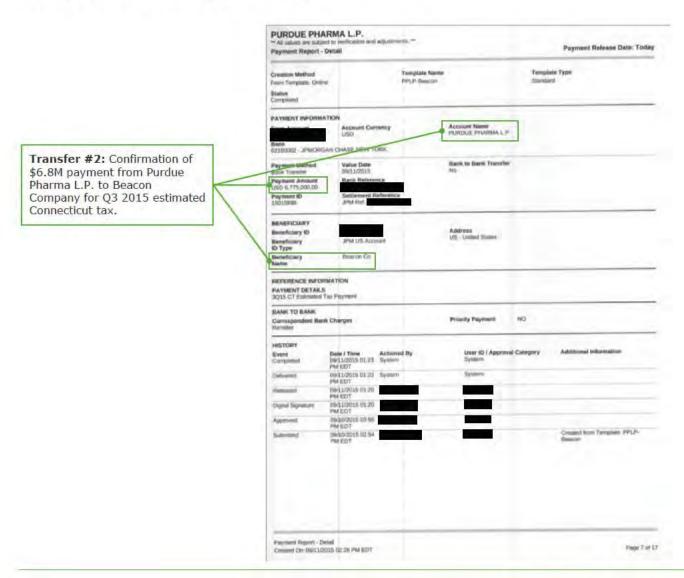
Transfer #1: Authorization for \$6.8M payment from Purdue Pharma L.P. to Rosebay Medical Company L.P. for Q3 2015 estimated Connecticut state tax.



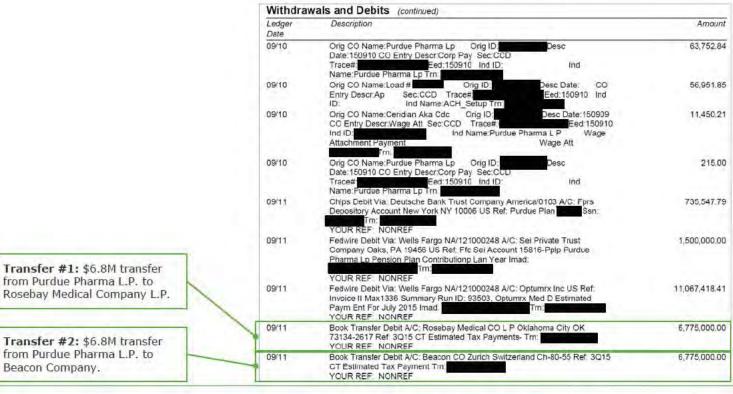












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# Exhibit F – Rhodes Cash Distributions Tracing Analysis

#### **Rhodes Cash Distributions Tracing Analysis - Objectives**

#### **Objective**

1. Trace Rhodes Cash Distributions identified in Rhodes's SAP accounts payable ledger to the available third-party bank statements in order to validate if the distributions amounts, posting/transaction dates, payee/beneficiary names and payor entities were consistent and/or similar in both sources of information.

#### **Procedures Performed**

- 1. Determined time period and entities to review based on Rhodes and Purdue's Internal Distribution Analysis and our reconciliation work. Bank statements were available for July 2014 onwards unless specifically requested from storage by TXP.
- 2. Reviewed bank statements to determine account holder entity name and time period represented.
- 3. Each Rhodes Cash Distribution identified in Purdue's SAP accounts payable ledger was compared to the available bank statements in order to find a match by payor entity, payee name, posting/transaction date and amount.
- 4. Certain transactions were assumed to be matches even if certain criteria were not an exact match. For example, if a distribution amount matched, but the payee name was not included in the bank statement and the posting date was within 60 days (before or after) of the transaction date included on the bank statement, then the distribution was generally considered to be a match.
  - If any of the criteria were not a match, the discrepancy was noted.
  - For payee name mismatches, the most common reason was that the bank statement did not include a payee name.

#### Rhodes Cash Distributions Tracing Analysis – Sources Relied Upon

The following sources of information were accessed and reviewed from Purdue, Rhodes and TXP:

- 1. Cash Distributions identified in Rhodes's SAP accounts payable ledger; and
- 2. Bank statements for Rhodes and Affiliated Entities from the below periods highlighted in green:

Coventry Technologies L.P. (Company #230) Bank Statement Periods Received												
	Q1		Q2			Q3			Q4			
Year	J	F	М	A.	М	J	J	Α	S	0	N	D
2014												
2015												
2016												
2017												
2018												

SVC Pharma L.P. (Company #507)												
	Bank Statement Periods Received											
		Q1			Q2			Q3			Q4	
Year	J	F	М	A	М	J	J	Α	S	0	N	D
2014												
2015												
2016												
2017												
2018												

Based upon on the tracing work performed on the Rhodes Cash Distributions recorded in the SAP accounts payable ledger to the available third-party bank statements, we have the following observations:

1. The available third-party bank statements included 75 transactions totaling \$53.28 million, of which matches between the two sources of information (SAP accounts payable ledger and Bank Statements) were identified for 75 transactions (100% of total) totaling \$53.28 million (100% of total).

	Payabl	e Le	ns in SAP Accounts edger within Bank ment periods	Accou	ctions in SAP Payable Ledger Bank Statements	
Company Name (Company #)	# Trx		\$ Amount	# Trx		\$ Amount
Coventry Technologies L.P. (Company #230)	63	\$	52,644,200	63	\$	52,644,200
SVC Pharma L.P. (Company #507)	12	\$	630,882	12	\$	630,882
Rhodes Technologies (Company #227)		\$	-	_	\$	-
Rhodes Technologies Inc. (Company #247)	_	\$	-	_	\$	-
Rhodes Pharmaceuticals LP (Company #250)	_	\$	-	-	\$	-
Rhodes Pharmaceuticals Inc. (Company #251)	_	\$	-	_	\$	-
	75	\$	53,275,082	75	\$	53,275,082
As % of Transactions within Bank Statement periods	100%		100%	100%		100%

2. For Coventry Technologies L.P. (Entity #230):

Jul. 2014 - Dec. 2018
63 – \$52.6m
63 <i>(100%)</i> – \$52.6m <i>(100%)</i>
14 - \$6.49m
27 - \$44.96m
<ul> <li>2 payments to Rosebay Medical Company LP totaling \$14.65m were combined into a single transaction in the bank statement</li> </ul>
22 - \$1.19m
All are checks for tax-related payments

<sup>&</sup>lt;sup>1</sup> SAP accounts payable ledger posting date considered a match if within +/- 60 days of bank statement transaction date.

#### 3. For SVC Pharma L.P. (Entity #507):

Periods for which statements are available:	Aug. 2014 – Dec. 2018
Number of transactions in AP Extract file:	21 – \$1.17m
Number of transactions in AP Extract file within available bank statement periods:	12 – \$631k
Number of transactions matched to bank statements (and as % of total for available statement periods):	12 <i>(100%)</i> – \$631k <i>(100%)</i>
Number of exact matches (payee, amount and date):	0
Number of payee and amount matches with close posting date match <sup>1</sup> :	2 – \$186k
Number of amount matches with close posting date match <sup>1</sup> (no payee name listed in bank statement):	<ul><li>10 - \$445k</li><li>All are checks recorded in SAP as payable to Comptroller of Maryland</li></ul>
match <sup>1</sup> (no payee name listed in bank statement):	All are checks recorded in SAP as payable to Comptroller of M

<sup>&</sup>lt;sup>1</sup> SAP accounts payable ledger posting date considered a match if within +/- 60 days of bank statement transaction date.

4. For Rhodes Technologies (Entity #227):

Periods for which statements are available:	Jul. 2014 – Dec. 2018
Number of transactions in SAP accounts payable ledger within available bank statement periods:	0
Number of transactions matched to bank statements:	0
Number of exact matches (payee, amount and date):	n/a
Number of payee and amount matches with close posting date match <sup>1</sup> :	n/a
Number of amount matches with close posting date match <sup>1</sup> (no payee name listed in bank statement):	n/a

<sup>&</sup>lt;sup>1</sup> SAP accounts payable ledger posting date considered a match if within +/- 60 days of bank statement transaction date.

5. For Rhodes Technologies Inc. (Entity #247):

Periods for which statements are available:	Aug. 2014 - Dec. 2018
Number of transactions in SAP accounts payable ledger within available bank statement periods:	0
Number of transactions matched to bank statements:	0
Number of exact matches (payee, amount and date):	n/a
Number of payee and amount matches with close posting date match <sup>1</sup> :	n/a
Number of amount matches with close posting date match <sup>1</sup> (no payee name listed in bank statement):	n/a

<sup>&</sup>lt;sup>1</sup> SAP accounts payable ledger posting date considered a match if within +/- 60 days of bank statement transaction date.

6. For Rhodes Pharmaceuticals L.P. (Entity #250):

Periods for which statements are available:	Aug. 2014 - Dec. 2018
Number of transactions in SAP accounts payable ledger within available bank statement periods:	0
Number of transactions matched to bank statements:	0
Number of exact matches (payee, amount and date):	n/a
Number of payee and amount matches with close posting date match <sup>1</sup> :	n/a
Number of amount matches with close posting date match <sup>1</sup> (no payee name listed in bank statement):	n/a

<sup>&</sup>lt;sup>1</sup> SAP accounts payable ledger posting date considered a match if within +/- 60 days of bank statement transaction date.

## Rhodes Cash Distributions Tracing Analysis - Observations and Findings

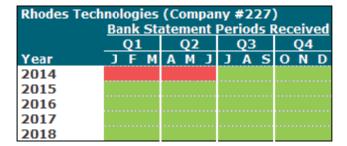
7. For Rhodes Pharmaceuticals Inc. (Entity #251):

Periods for which statements are available:	Aug. 2014 - Dec. 2018
Number of transactions in SAP accounts payable ledger within available bank statement periods:	0
Number of transactions matched to bank statements:	0
Number of exact matches (payee, amount and date):	n/a
Number of payee and amount matches with close posting date match <sup>1</sup> :	n/a
Number of amount matches with close posting date match <sup>1</sup> (no payee name listed in bank statement):	n/a

<sup>&</sup>lt;sup>1</sup> SAP accounts payable ledger posting date considered a match if within +/- 60 days of bank statement transaction date.

### Rhodes Cash Distributions Tracing Analysis - Observations and Findings

8. Statements for the following entities were provided, but no transactions were identified in the SAP accounts payable ledger:



Rhodes Tech					c. ( me							ed
		Q1			Q2			Q3			Q4	
Year	J	F	М	Α	М	J	J	Α	S	0	N	D
2014												
2015												
2016												
2017												
2018												

Rhodes Phar					i LF me							
		Q1			Q2			Q3			Q4	ļ
Year	J	F	М	Α	М	J	J	Α	S	0	N	D
2014												
2015												
2016												
2017												
2018												

Rhodes Phar					In me							
		Q1 Q2					Q3			Q4		
Year	J	F	М	Α	М	J	J	Α	S	0	N	D
2014												
2015												
2016												
2017												
2018												

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# **Rhodes Cash Distributions Flow of Funds Analysis**

### Flow of Funds Analysis – Cash Distribution and Capital Contribution Testing Selections

As illustrated in this section of the Cash Distribution and Capital Contributions Analysis, we performed a flow of funds analysis on each classification of Cash Distributions (Non-Tax and Tax) made ("Rhodes Cash Distribution Testing Selections") and Capital Contributions received ("Rhodes Capital Contributions Testing Selections") by Rhodes (collectively referred to as the "Rhodes Cash Distribution and Capital Contribution Testing Selections"):

#### **Rhodes Cash Distribution Testing Selections**

- Selection 1 Non-Tax Cash Distribution from Rhodes Technologies to Beacon Company and Rosebay Medical Company L.P., December 2011
- Selection 2 Tax Distribution for Estimated Federal Tax Payment, Q4 2014

#### **Rhodes Capital Contribution Testing Selections**

- Selection 1 Capital Contribution Received by Rhodes Technologies from Purdue Pharma L.P. through Affiliated Entities, April 2012
- **Selection 2** Capital Contribution Received by Rhodes Pharmaceuticals L.P. from Purdue Pharma L.P. through Affiliated Entities, May 2013
- **Selection 3** Capital Contribution Received by Rhodes Pharmaceuticals L.P. from Purdue Pharma L.P. through Affiliated Entities, October/November 2013

#### Rhodes Flow of Funds Analysis – Observations and Findings

The following summary of observations and findings is based upon our review and analysis of various sources of information that we obtained from Rhodes related to the Rhodes Cash Distribution and Capital Contribution Testing Selections:

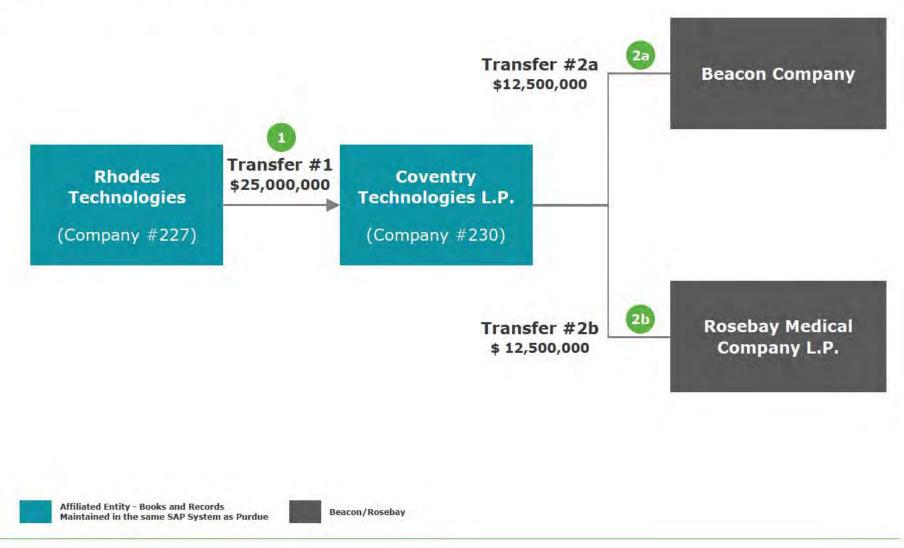
- 1. Rhodes Cash Distribution Testing Selection 1 was classified by Rhodes as a Non-Tax Cash Distribution that flowed from Rhodes Technologies up to and through Coventry Technologies L.P. and then from Coventry Technologies L.P. to Beacon Company and Rosebay Medical Company L.P.
  - It is our understanding from Rhodes that this flow of funds pattern is generally consistent with the other Non-Tax Cash Distributions made by Rhodes.
- 2. Rhodes Cash Distribution Testing Selection 2 was classified by Rhodes as a Tax Distribution that flowed from Coventry Technologies L.P. to Rosebay Medical Company L.P., Beacon Company and the United States Treasury and such classification is consistent with the documentation supporting this transaction.<sup>1</sup>
  - It is our understanding from Rhodes that this flow of funds pattern is generally consistent with the other Tax Distributions made by Rhodes.
- 3. Rhodes Capital Contribution Testing Selections 1 through 3 flowed from Purdue Pharma L.P. up to PRA L.P. and through other holdings companies, and then to Beacon Company and Rosebay Medical Company L.P., which made contributions to Rhodes Technologies or Rhodes Pharmaceuticals L.P. through Coventry Technologies L.P.
  - It is our understanding from Rhodes that this flow of funds pattern is generally consistent with the other Capital Contributions received by Rhodes.
- 4. Rhodes's accounting for the Rhodes Cash Distribution and Capital Contribution Testing Selections flow of funds is consistent with the available written approval and authorization documents supporting these transactions.
- 5. For the Rhodes Cash Distribution Testing Selections, the payee/beneficiary name recorded in Rhodes's accounts payable detail of the SAP general ledger system matches the payee/beneficiary name reported in Rhodes's Internal Distribution Analysis.

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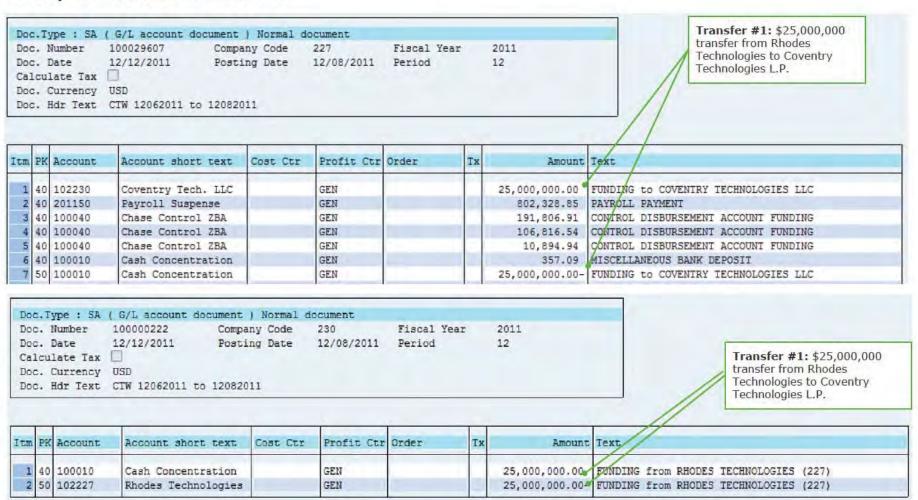
### **Rhodes Cash Distribution Testing Selections**

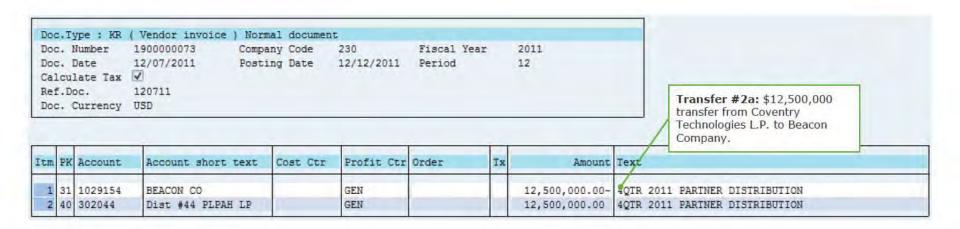
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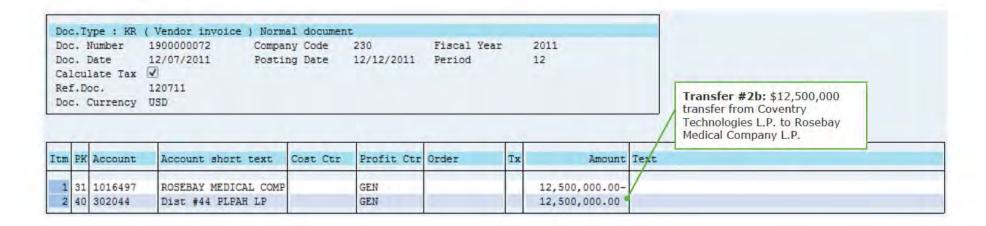
# Selection 1 Rhodes Non-Tax Cash Distributions (2011)

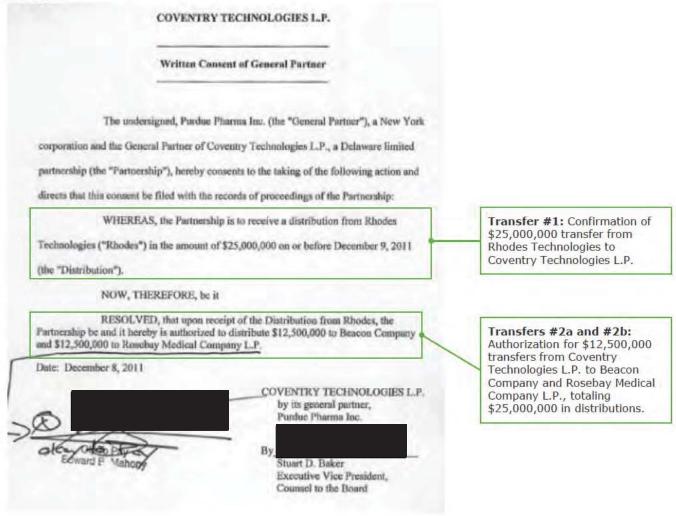


<sup>&</sup>lt;sup>1</sup> For consistency with PPLP's classification of Non-Tax Cash Distributions, this Non-Tax Cash Distribution by Rhodes that flowed up to Beacon Company and Rosebay Medical L.P. has been treated as a US Partner Cash Distribution in the Cash Distributions Analysis.



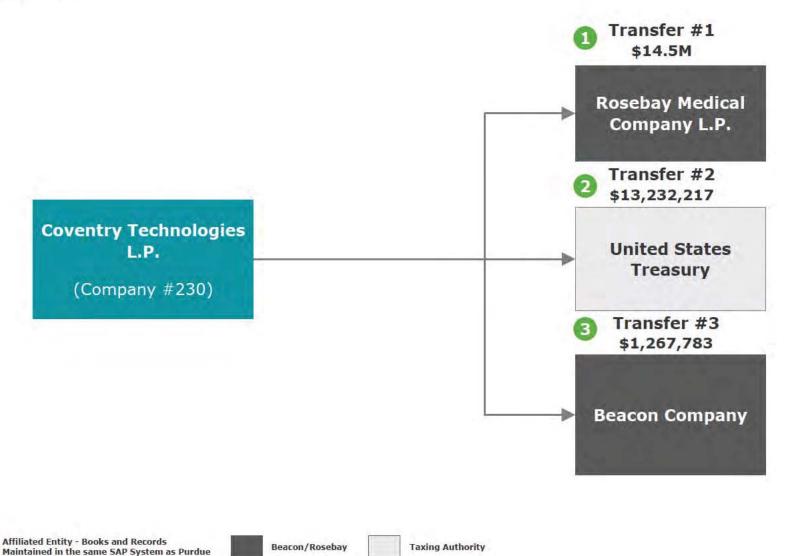






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## **Selection 2 Rhodes Tax Distribution** (2014)

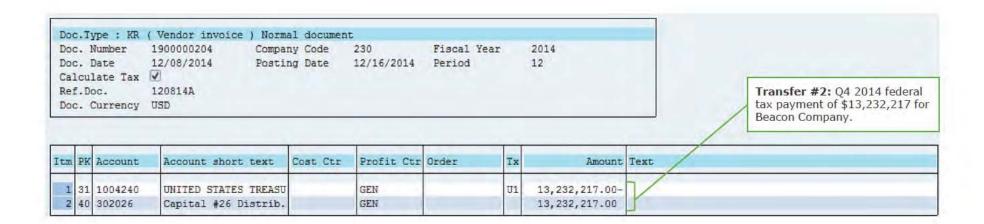


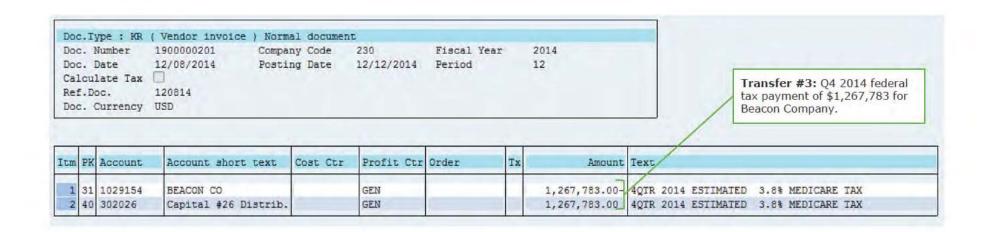
Doc.Type : KR	( Vendor invoice	) Normal	documen	.t		
Doc. Number	1900000203	Company	Code	230	Fiscal Year	2014
Doc. Date	12/08/2014	Posting	Date	12/12/2014	Period	12
Calculate Tax						
Ref.Doc.	120814E					
Doc. Currency	USD					

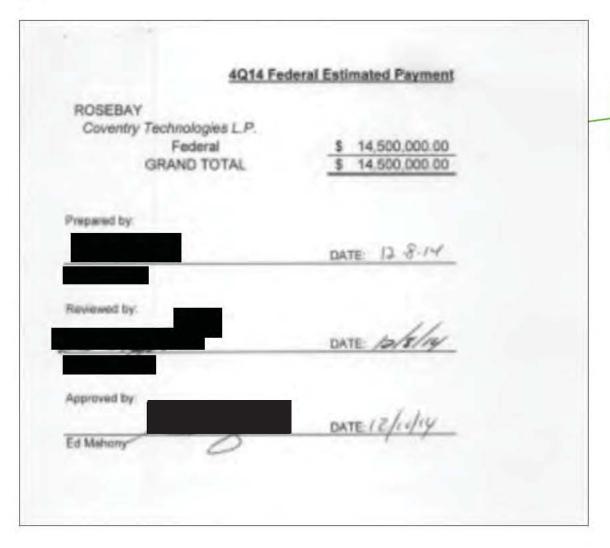
Itm	PK	Account	Account short text	Cost Ctr	Profit Ctr	Order	Tx	Amount	Text
1	31	1016497	ROSEBAY MEDICAL COMP		GEN			14,500,000.00-	4QTR 2014 FEDERAL ESTIMATED TAX PAYMENT
2	40	302027	Capital #27 Distrib.		GEN			14,500,000.00	4QTR 2014 FEDERAL ESTIMATED TAX PAYMENT

Transfer #1: \$14,500,000 transfer from Coventry Technologies L.P. to Rosebay Medical Company L.P.

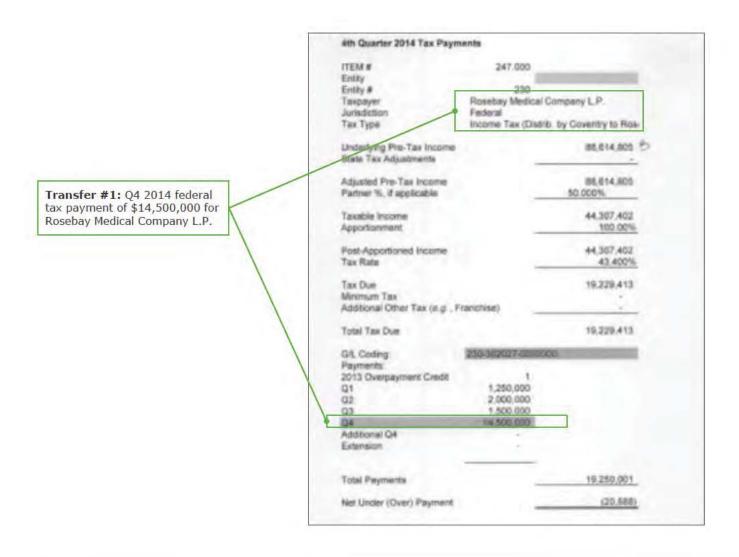
Source: SAP General Ledger detail

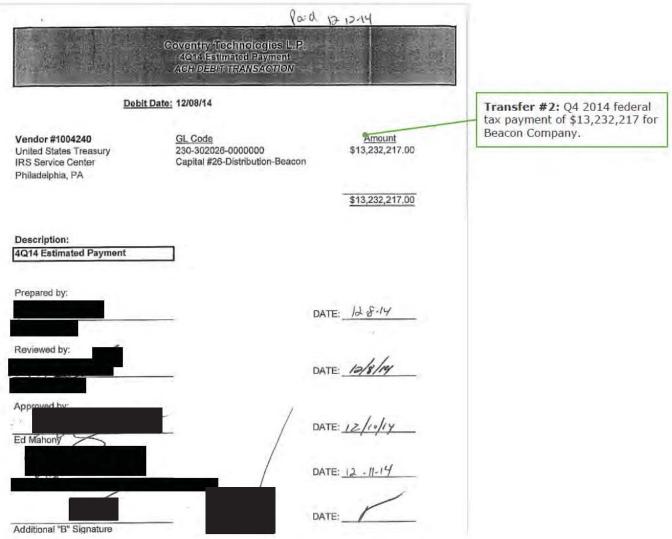


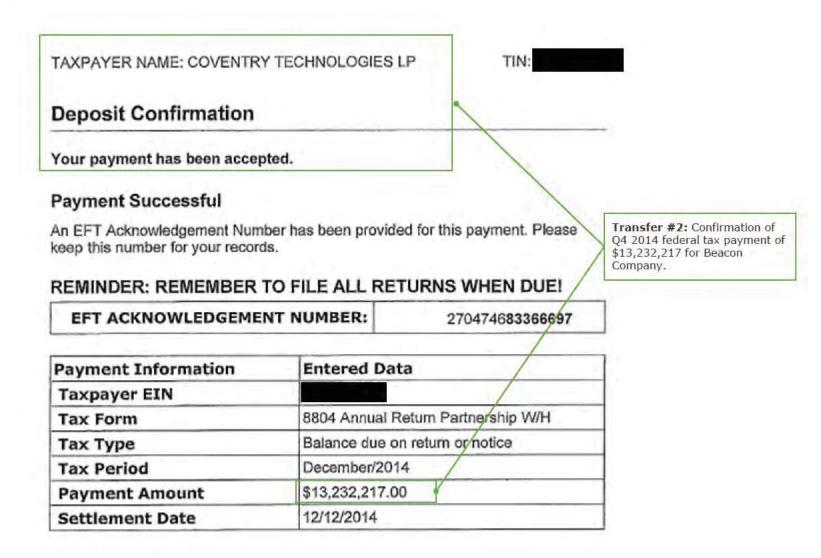




**Transfer #1:** Q4 2014 federal tax payment of \$14,500,000 for Rosebay Medical Company L.P.







Q4 2014 PHORNUE WHITE MIDENSHIPS HE RELIES IN RECURRENCE VIRIE X STANDARD WIRE ACH WIRE FOREIGN WERE DIRECT DEBIT "FOR" ACCOUNTS PAYABLE Payer Bank Acct Name: JPMorganChase USE ONLY Coverny Technologies LP SAP PAYMENT DUE DATE FROM CO. NAME Beacon Company PAYER VENDOR NAME: STREET ADDRESS: SAF VENDOR NUMBERS CITY, STATE, ZIP. RECIPIENT BANK NAME: JPMorgus Private Benk DAMONGE NO. 120 NO. CITY, STATE, OP ACCOUNT NUMBER Transfer #3: 04 2014 federal SWIFT CODE: CHASUESS AR DOCUMENT NUMBERS ISAN NUMBER: tax payment of \$1,267,783 for REQUESTED BY: Sue Kowalski Beacon Company. NOTE: BANKING INSTRUCTIONS MUST BE ATTACHED TO EACH WIRE SUBMISSION 1,267,783.00 TOTAL WIRE TRANSFER AMOUNT: 4Q14 Federal Estimated Payment - 3.8% Medicaro Tax Code/Ci. Evgures-Acet/Cost Cordar/Min/s/Project 1,267,783.00 239-302026-0000000 SSA, Deale (Capital #26-Distributions-Beacon) GAL DIAM. 1,267,783.00 NOTE: 1) Wire Transfer Amounts \$100,000 or less do not require an authorities sig Signature Required \$103,000.01 up to \$550,000 2nd Signature Regularid \$500,000.01 up to \$155M \$1,000,000.01 and shows, one of the signary must be: | (Group B): >\$1566 - Edward Makery INCITIE. Both Groups of "A" Eighers are authorized to sign up to \$000,000 simply (article includes Reymond Sathler), and jointly (tern "A" argumen) \$600,000,01 on as \$100.00 Last Revision: 16/2671

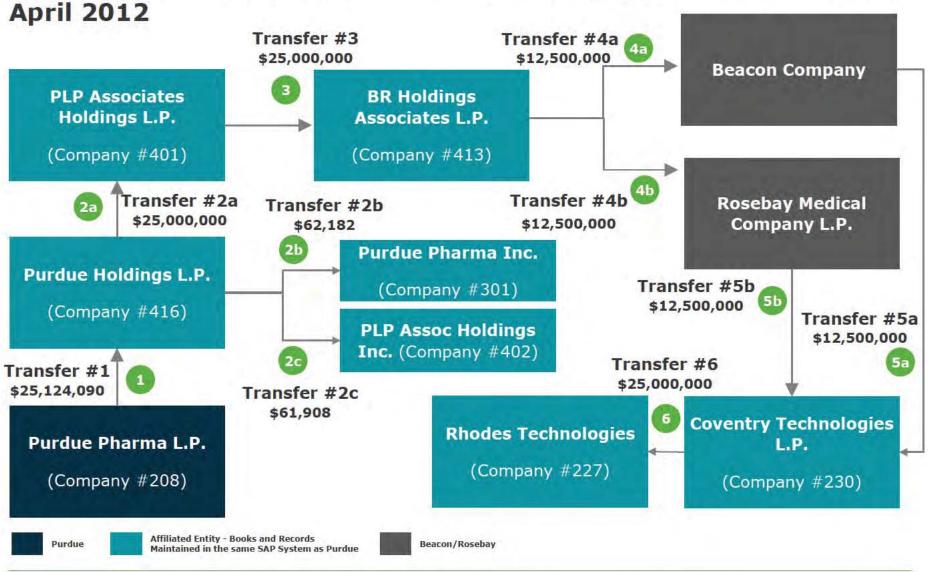
Source: Purdue Tax Department estimate of federal tax payment

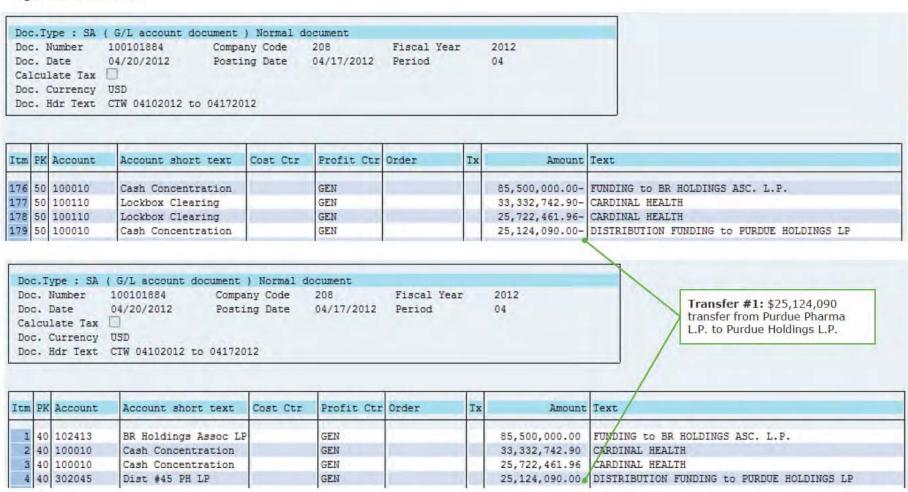
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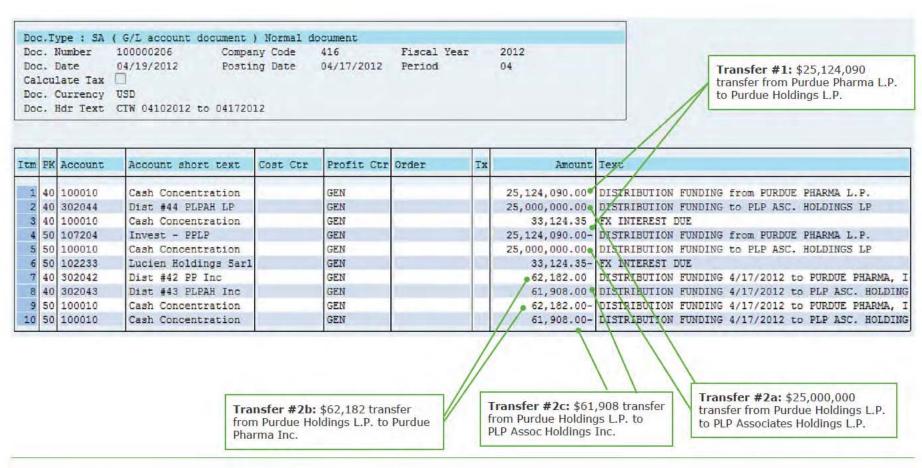
## **Rhodes Capital Contribution Testing Selections**

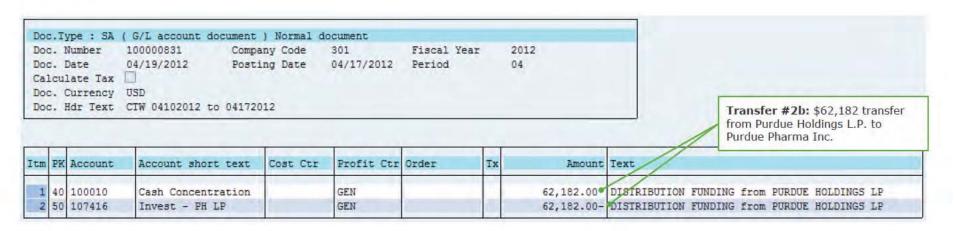
### **Alix**Partners

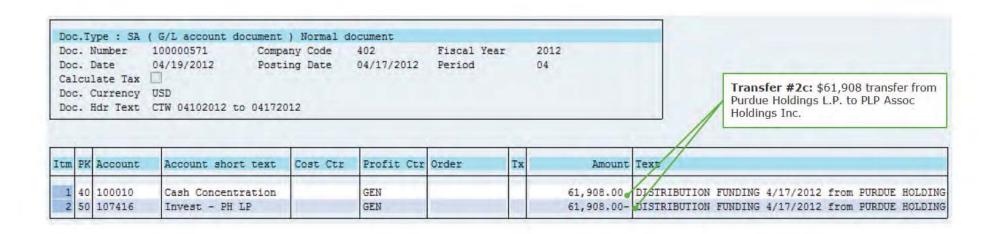
# Selection 1 Rhodes Capital Contribution (2012)

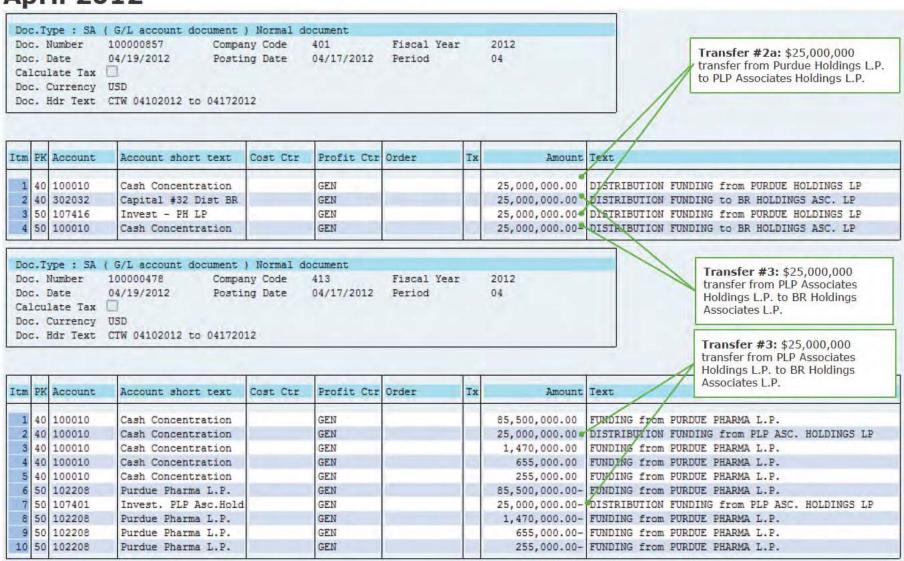




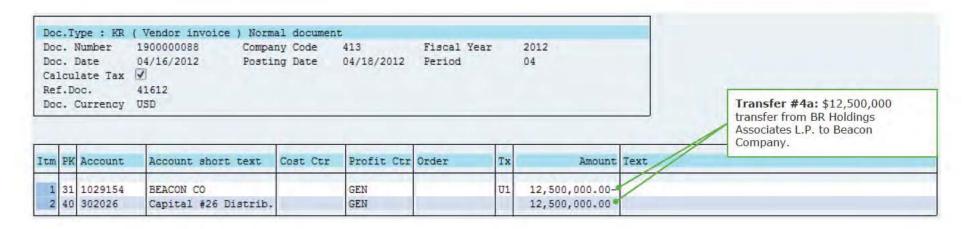


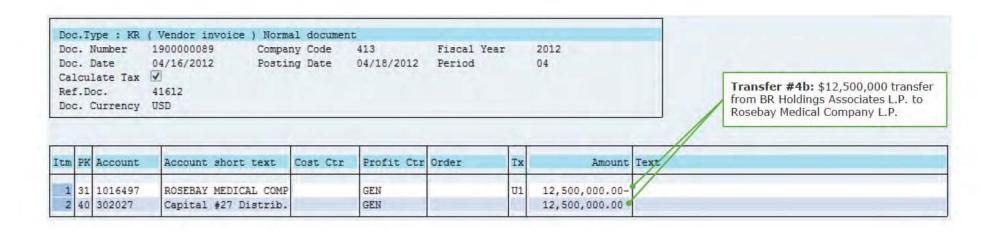


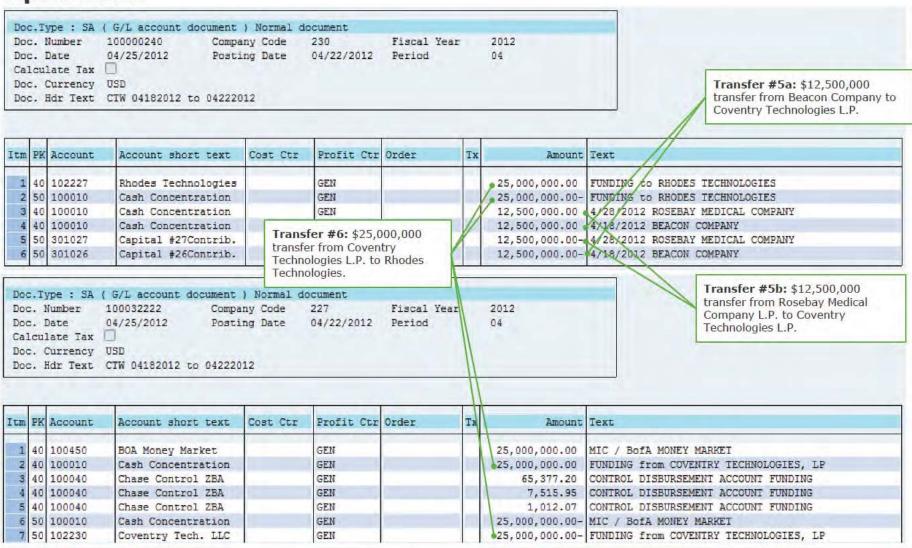




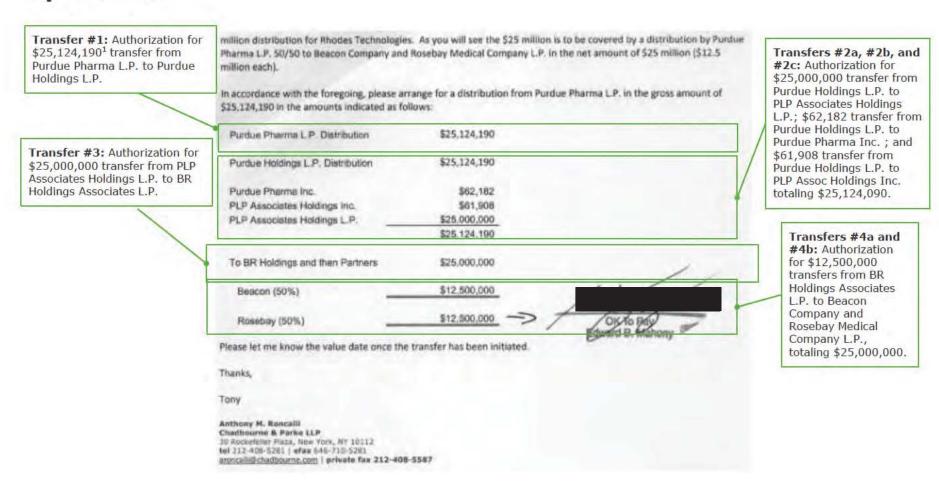
Source: SAP General Ledger detail







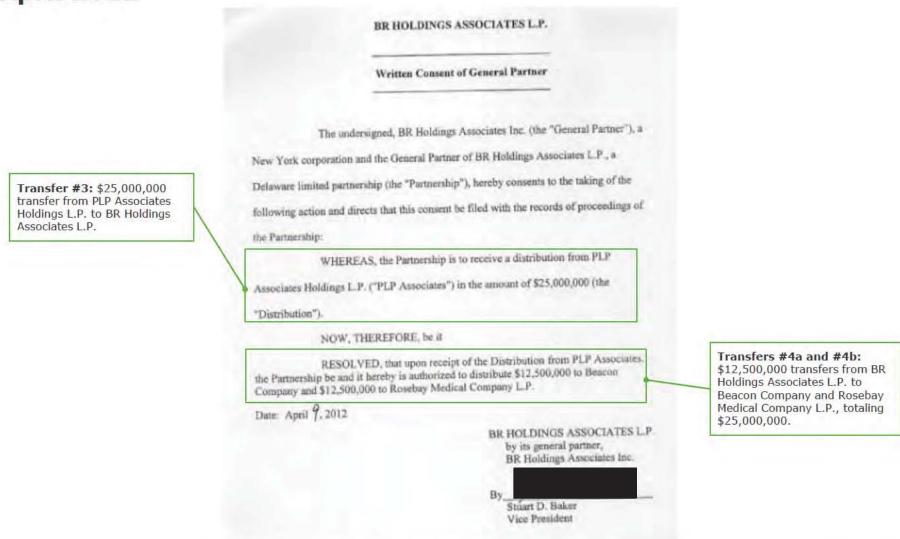
Source: SAP General Ledger detail



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276

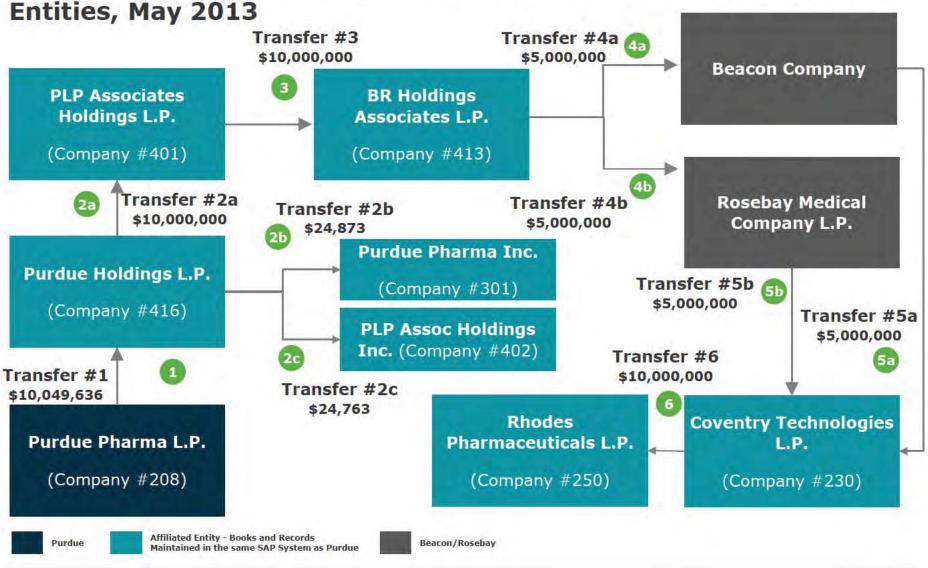
<sup>&</sup>lt;sup>1</sup> A \$100 discrepancy exists between the authorized distribution amount of \$25,124,190 and the distribution that was recorded in SAP of \$25,124,090.



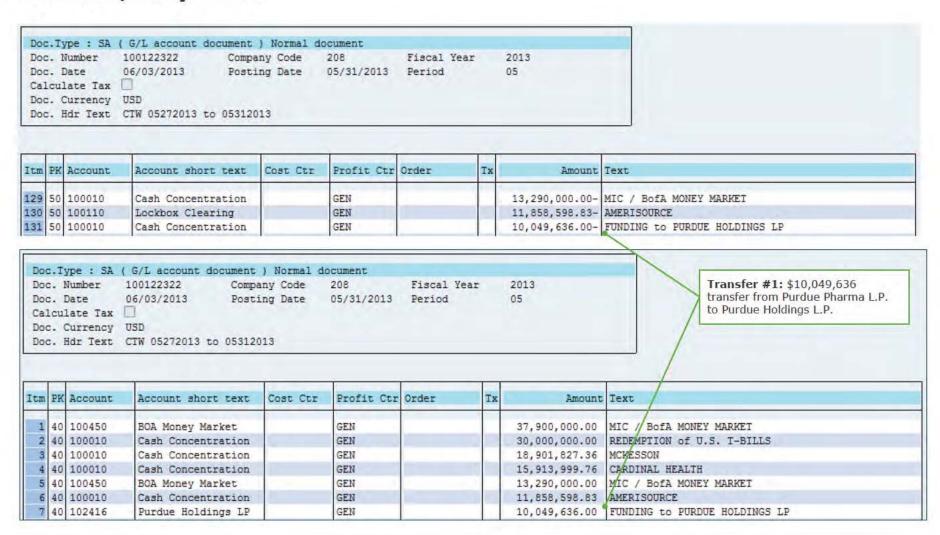
### **Alix**Partners

Selection 2 Rhodes Capital Contribution (2013)

Selection 2 – Capital Contribution Received by Rhodes
Pharmaceuticals L.P. from Purdue Pharma L.P. through Affiliated
Entities May 2013



#### Selection 2 – Capital Contribution Received by Rhodes Pharmaceuticals L.P. from Purdue Pharma L.P. through Affiliated Entities, May 2013



### Selection 2 – Capital Contribution Received by Rhodes Pharmaceuticals L.P. from Purdue Pharma L.P. through Affiliated Entities, May 2013

Dan Manten	100000000	Commerce Code	11.5	Edward Wass	2012
Doc. Number	100000321	Company Code	416	Fiscal Year	2013
Doc. Date	06/03/2013	Posting Date	05/31/2013	Period	05
Calculate Tax					
Doc. Currency	USD				
Doc. Hdr Text	CTW 05272013 t	05312013			

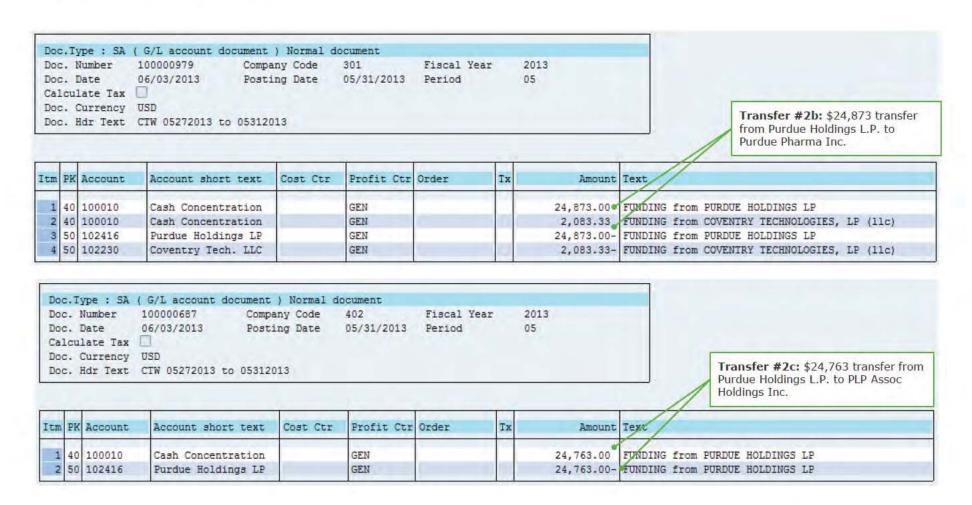
Itm	PK	Account	Account short text	Cost Ctr	Profit Ctr	Order	Tx	Amount	Text
1	40	100010	Cash Concentration		GEN			10,049,636.00	DISTRIBUTION FUNDING from PURDUE PHARMA L.P.
2	40	102401	PLP Assoc Holdings		GEN			10,000,000.00	FUNDING to PLP ASC. HOLDINGS LP
3	40	100010	Cash Concentration	7	GEN			1,500,000.00	DISTRIBUTION FUNDING from PURDUE PHARMA L.P.
4	40	102301	Purdue Pharma Inc.		GEN			p24,873.00	FUNDING DO PURDUD DUADAN TANO
5	40	102402	PLP Assoc Holdings		GEN			/ 24,763.00	FUNDING to PLP Transfer #1: \$10,049,636
6	50	102208	Purdue Pharma L.P.		GEN			1/0/049,636.00-	DISTRIBUTION T transfer from Purdue Pharma L.P.
7	50	100010	Cash Concentration		GEN				FUNDING to PLP to Purdue Holdings L.P.
8	50	102208	Purdue Pharma L.P.		GEN			/ /1,500,000.00-	DISTRIBUTION FUNDING from PURDUE PHARMA L.P.
9	50	100010	Cash Concentration		GEN		/	/ 24,873.00-	FUNDING to PURDUE PHARMA, INC.
10	50	100010	Cash Concentration		GEN		/	/ / 24,763.00-	FUNDING to PLP ASC. HOLDINGS, INC.

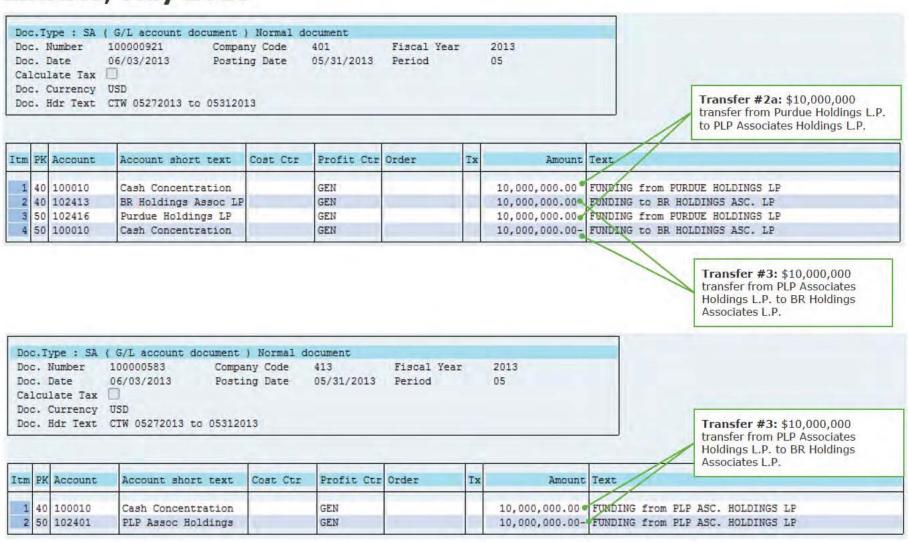
**Transfer #2b:** \$24,873 transfer from Purdue Holdings L.P. to Purdue Pharma Inc.

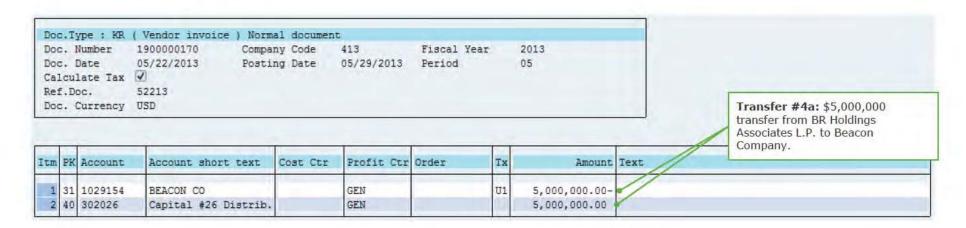
**Transfer #2c:** \$24,763 transfer from Purdue Holdings L.P. to PLP Assoc Holdings Inc.

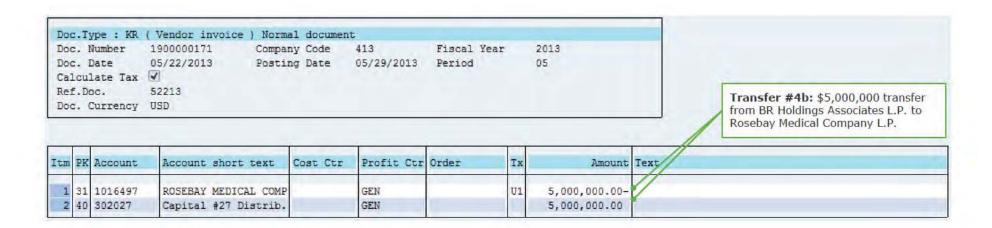
Transfer #2a: \$10,000,000 transfer from Purdue Holdings L.P. to PLP Associates Holdings I.P.

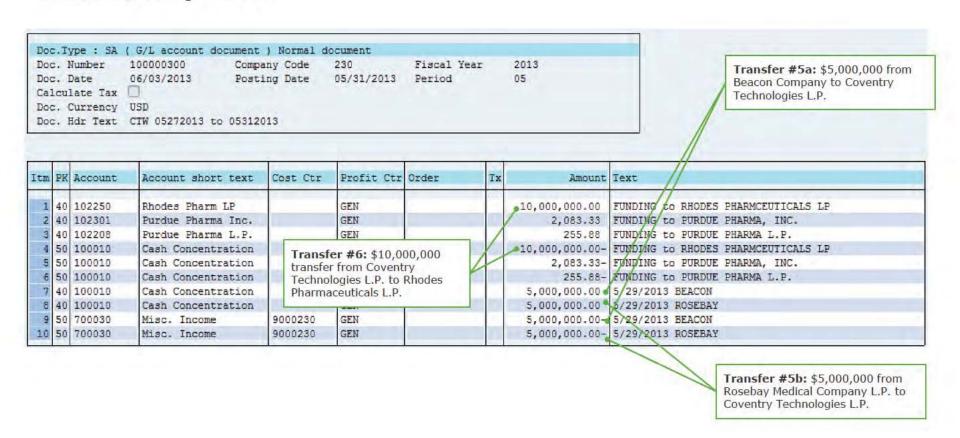
### Selection 2 – Capital Contribution Received by Rhodes Pharmaceuticals L.P. from Purdue Pharma L.P. through Affiliated Entities, May 2013



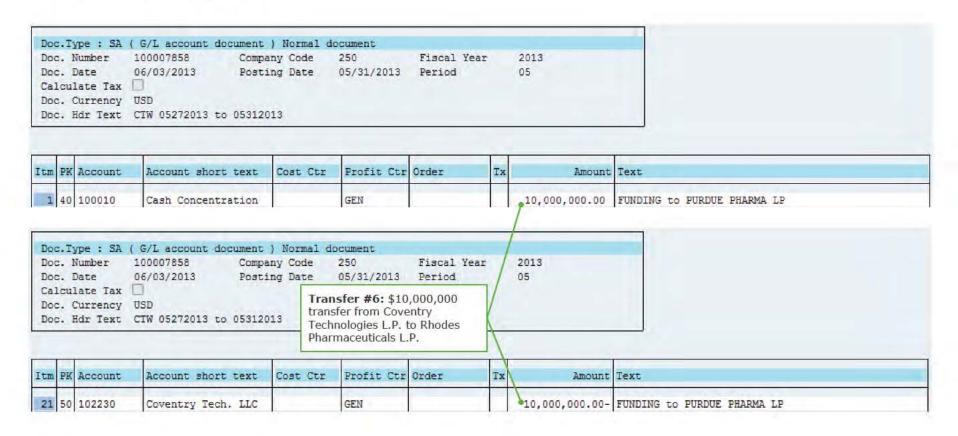


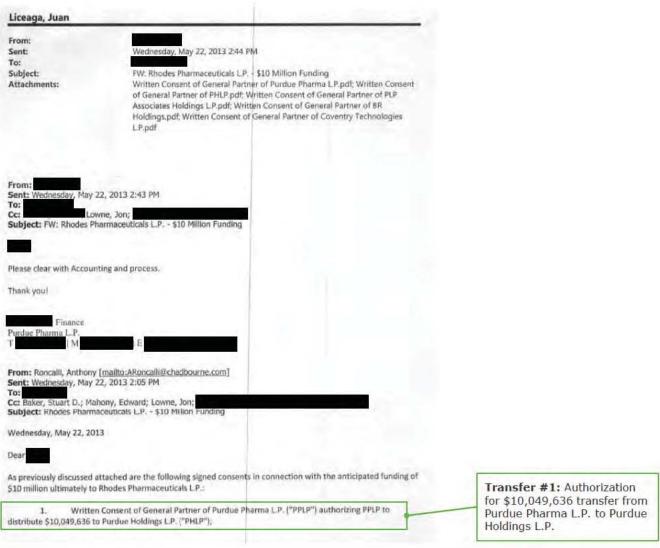






Source: SAP General Ledger detail





Transfer #3: Authorization for \$10,000,000 transfer from PLP Associates Holdings L.P. to BR Holdings Associates L.P.

- Written Consent of General Partner of PHLP authorizing PHLP to transfer \$24,873 to Purdue Pharma Inc., \$24,763 to PLP Associates Holdings Inc. and \$10 million to PLP Associates Holdings L.P.
- Written Consent of General Partner of PLP Associates Holdings L.P. authorizing PLP Associates Holdings L.P. to transfer \$10 million to BR Holdings Associates L.P. ("BR Holdings");
- Written Consent of General Partner of BR Holdings authorizing BR Holdings to transfer \$5
  million to Beacon Company and \$5 million to Rosebay Medical Company L.P.:
- Written Consent of General Partner of Coventry Technologies L.P. ("Coventry") authorizing Coventry upon receipt of \$5 million from Beacon Company and \$5 million from Rosebay Medical Company L.P. to transfer the \$10 million to Rhodes Pharmaceuticals L.P.

Transfer #6: Authorization for \$10,000,000 transfer from Coventry Technologies L.P. to Rhodes Pharmaceuticals L.P. upon receipt of \$5,000,000 transfers from Beacon Company and Rosebay Medical Company L.P., totaling \$10,000,000

Please send me the wire transfer instructions to the account of Coventry, and I will make arrangements with each of Beacon Company and Rosebay Medical Company L.P. to transfer the funds to Coventry upon their receipt from BR Holdings. Please also let me know the expected value date so I can give each of Beacon Company and Rosebay Medical Company L.P. a heads up as to when they will be expected to receive and transfer the funds to Coventry.

Thanks,

Tony

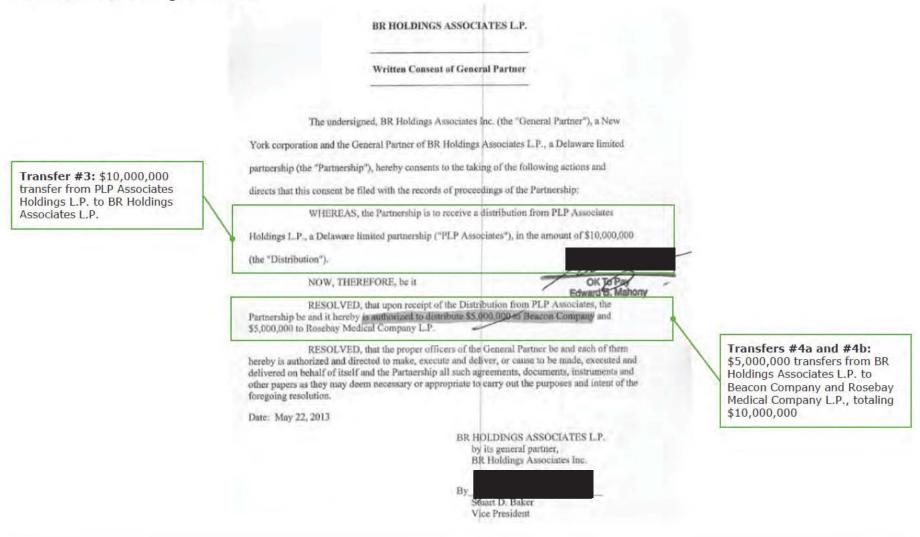
Anthony M. Roncalli
Chadbourne & Parke LLP
30 Rockefeller Piaza, New York, NY 10112
tel 212-408-5281 | efax 646-710-5281
aroncall@chadbourne.com | private fax 212-408-5587

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For additional information about Chadbourne & Parke LLP and Chadbourne & Parke (London) LLP, including a list of attorneys, please see our website at <a href="http://www.chadbourne.com">http://www.chadbourne.com</a>

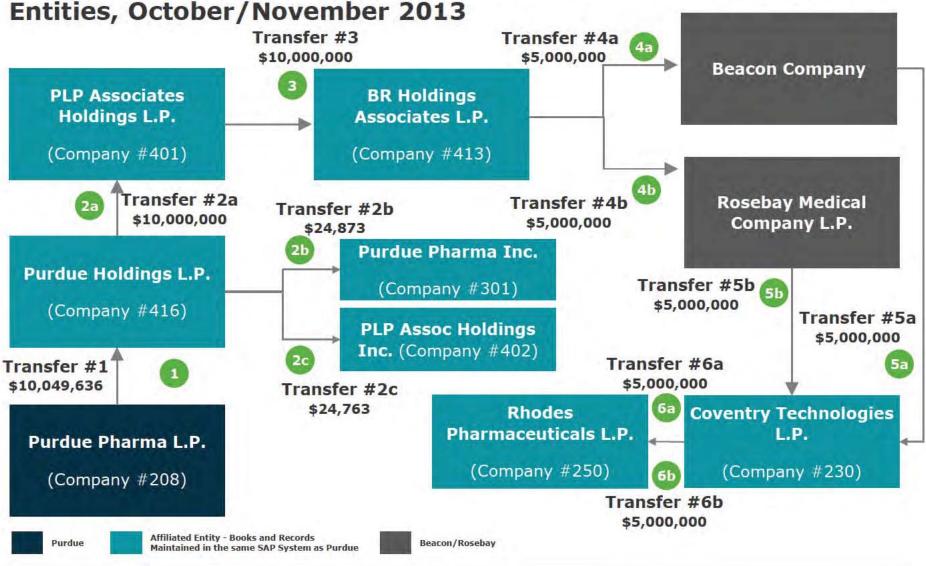
Transfers #2a, #2b, and #2c: Authorization for \$10,000,000 transfer from Purdue Holdings L.P. to PLP Associates Holdings L.P.; \$24,873 transfer from Purdue Holdings L.P. to Purdue Pharma Inc.; and \$24,763 transfer from Purdue Holdings L.P. to PLP Assoc Holdings Inc. totaling \$10,049,636.

> Transfers #4a and #4b Authorization for \$5,000,000 transfers from BR Holdings Associates L.P. to Beacon Company and Rosebay Medical Company L.P., totaling \$10,000,000



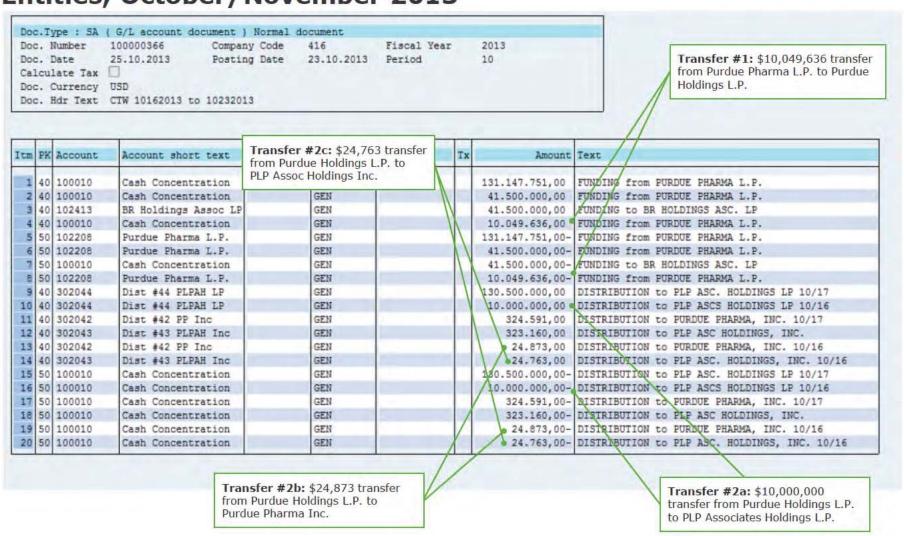
# **Alix**Partners

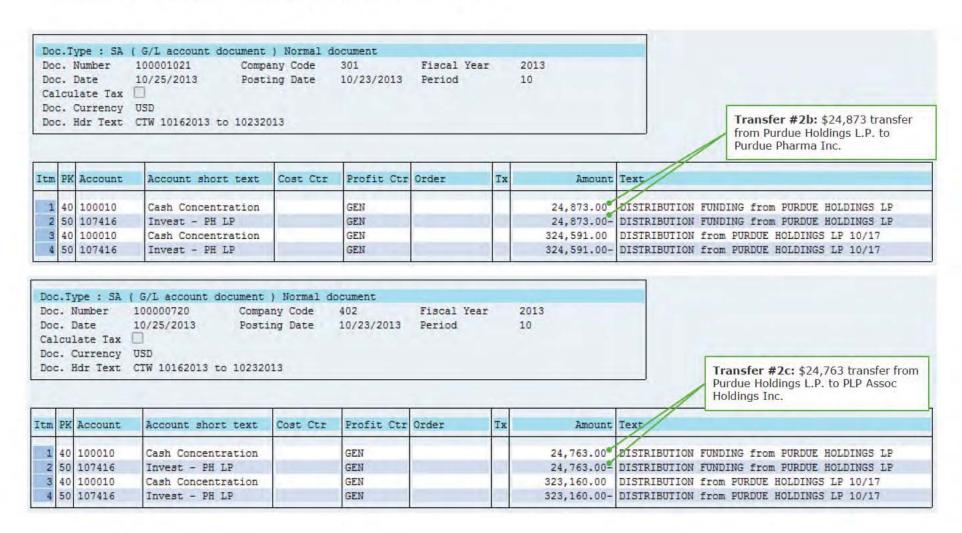
Selection 3 Rhodes Capital Contribution (2013)

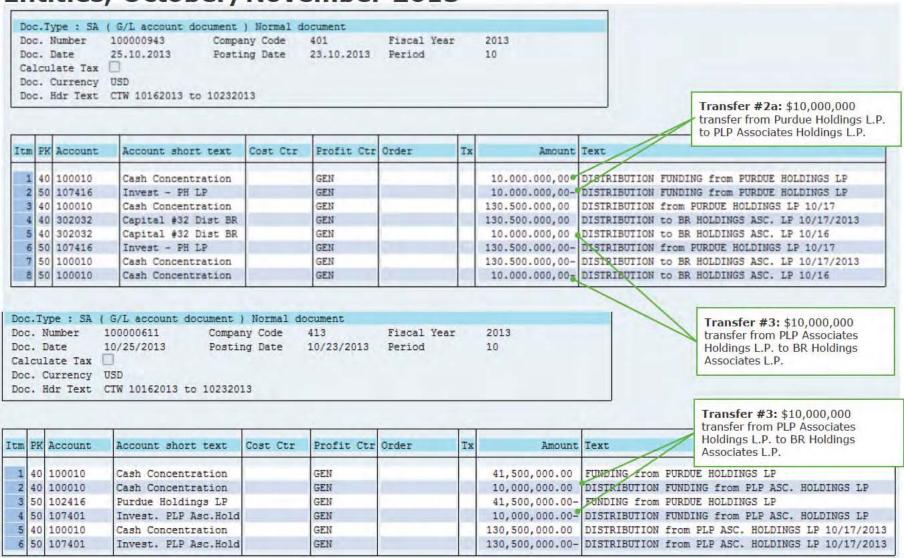


Doc.	Ty	pe : DA (	G/L account document	) Normal do	cument				
Doc. Calc Doc.	D ul C	ate ate Tax [ Currency	10/25/2013 Posti		208 10/23/2013	Fiscal Year Period	r	2013	
tm P	K	Account	Account short text	Cost Ctr	Profit Ctr	Order	Tx	Amount	Text
179 5	0	100110	Lockbox Clearing		GEN			18,622,831.65-	MCKESSON
180 5	0	100110	Lockbox Clearing		GEN			14,578,759.19-	AMERISOURCE
81 5	0	100110	Lockbox Clearing		GEN				CARDINAL HEALTH
.82 5	0	100010	Cash Concentration		GEN				FUNDING to PURDUE HOLDINGS LP
Doc. Doc. Calc Doc.	N D	Number Date Late Tax   Currency	10/25/2013 Posti	any Code ing Date	208	Fiscal Year Period	r	2013 10	Transfer #1: \$10,049,636 transfer from Purdue Pharma L.P. to Purdue Holdings L.P.
Doc. Calc Doc. Doc.	N D C L C H	Number Date Late Tax   Currency idr Text	100129346 Compa 10/25/2013 Posti USD CTW 10162013 to 102320	ny Code ng Date	208 10/23/2013	Period		10	transfer from Purdue Pharma L.P. to Purdue Holdings L.P.
Doc. Calc Doc. Doc.	N D C L C H	Number Date Late Tax   Currency	100129346 Compa 10/25/2013 Posti USD	any Code ing Date	208	Period	Tx		transfer from Purdue Pharma L.P. to Purdue Holdings L.P.
Doc. Doc. Doc. Doc. Itm P	N D Cul	Number Date Late Tax   Currency idr Text  Account	100129346 Compa 10/25/2013 Posti USD CTW 10162013 to 102320  Account short text Purdue Holdings LP	ny Code ng Date	208 10/23/2013 Profit Ctr	Period		Amount 131,147,751.00	transfer from Purdue Pharma L.P. to Purdue Holdings L.P.  Text  FUNDING to PURDUE HOLDINGS LP
Doc. Doc. Doc. Doc. Ttm P	N D Cull C H	Number Date Late Tax   Currency idr Text  Account  102416 100450	100129346 Compa 10/25/2013 Posti  USD CTW 10162013 to 102320  Account short text  Purdue Holdings LP BOA Money Market	ny Code ng Date	208 10/23/2013 Profit Ctr GEN GEN	Period		Amount 131,147,751.00 100,000,000.00	transfer from Purdue Pharma L.P. to Purdue Holdings L.P.  Text  FUNDING to PURDUE HOLDINGS LP MIC / BofA MONEY MARKET
Doc. Doc. Doc. Doc. Itm P	N D Cull C H	Number Date Late Tax   Currency idr Text  Account  102416 100450 102416	100129346 Compa 10/25/2013 Posti  USD CTW 10162013 to 102320  Account short text  Purdue Holdings LP BOA Money Market Purdue Holdings LP	ny Code ng Date	208 10/23/2013 Profit Ctr GEN GEN GEN	Period		Amount 131,147,751.00 100,000,000.00 41,500,000.00	transfer from Purdue Pharma L.P. to Purdue Holdings L.P.  Text  FUNDING to PURDUE HOLDINGS LP MIC / BofA MONEY MARKET FUNDING to PURDUE HOLDINGS LP
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Doc. Calc Doc. Doc. Doc.	N D C C C C C C C C C C C C C C C C C C	Account  102416 100450 100010 100430	100129346 Compa 10/25/2013 Posti  USD CTW 10162013 to 102320  Account short text  Purdue Holdings LP BOA Money Market Purdue Holdings LP BOA Money Market Cash Concentration Money Mkt Goldman	ny Code ng Date	Profit Ctr GEN GEN GEN GEN GEN GEN GEN GEN GEN	Period		Amount  131,147,751.00 100,000,000.00 41,500,000.00 36,000,000.00 30,000,000.00 25,000,000.00	transfer from Purdue Pharma L.P. to Purdue Holdings L.P.  Text  FUNDING to PURDUE HOLDINGS LP MIC / Bofa MONEY MARKET FUNDING to PURDUE HOLDINGS LP MIC / Bofa MONEY MARKET REDEMPTION of U.S. T-BILLS GOLDMAN SACHS - MONEY MARKET
Doc. Calc Doc. Doc. Doc. Ttm P 1 4 4 4 4 4 4 5 4 4 7 4	N D D D D D D D D D D D D D D D D D D D	Account  102416 100450 100450 100430 100450	100129346 Compa 10/25/2013 Posti  USD CTW 10162013 to 102320  Account short text  Purdue Holdings LP BOA Money Market Purdue Holdings LP BOA Money Market Cash Concentration Money Mkt Goldman BOA Money Market	ny Code ng Date	Profit Ctr GEN	Period		Amount  131,147,751.00 100,000,000.00 41,500,000.00 36,000,000.00 30,000,000.00 25,000,000.00 20,500,000.00	transfer from Purdue Pharma L.P. to Purdue Holdings L.P.  Text  FUNDING to PURDUE HOLDINGS LP MIC / Bofa MONEY MARKET FUNDING to PURDUE HOLDINGS LP MIC / Bofa MONEY MARKET REDEMPTION of U.S. T-BILLS GOLDMAN SACHS - MONEY MARKET MIC / Bofa MONEY MARKET
Doc. Calc Doc. Doc. Doc. Ttm P 1 4 4 4 4 4 4 4 4 4 8 4 4 8 4	N D D D D D D D D D D D D D D D D D D D	Account  102416 100450 100450 100450 100450 100450 100450 100450 100450	Account short text  Purdue Holdings LP BOA Money Market Purdue Holdings LP BOA Money Market Cash Concentration Money Mkt Goldman BOA Money Market Cash Concentration	ny Code ng Date	Profit Ctr GEN	Period		Amount  131,147,751.00 100,000,000.00 41,500,000.00 36,000,000.00 25,000,000.00 25,000,000.00 20,500,000.00 18,622,831.65	transfer from Purdue Pharma L.P. to Purdue Holdings L.P.  Text  FUNDING to PURDUE HOLDINGS LP MIC / BofA MONEY MARKET FUNDING to PURDUE HOLDINGS LP MIC / BofA MONEY MARKET REDEMPTION of U.S. T-BILLS GOLDMAN SACHS - MONEY MARKET MIC / BofA MONEY MARKET
Doc. Calc Doc. Doc. Doc. Ttm P 1 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	N D D D D D D D D D D D D D D D D D D D	Account  102416 100450 100450 100430 100450	100129346 Compa 10/25/2013 Posti  USD CTW 10162013 to 102320  Account short text  Purdue Holdings LP BOA Money Market Purdue Holdings LP BOA Money Market Cash Concentration Money Mkt Goldman BOA Money Market	ny Code ng Date	Profit Ctr GEN	Period		Amount  131,147,751.00 100,000,000.00 41,500,000.00 36,000,000.00 25,000,000.00 25,000,000.00 20,500,000.00 18,622,831.65 14,578,759.19	transfer from Purdue Pharma L.P. to Purdue Holdings L.P.  Text  FUNDING to PURDUE HOLDINGS LP MIC / BofA MONEY MARKET FUNDING to PURDUE HOLDINGS LP MIC / BofA MONEY MARKET REDEMPTION of U.S. T-BILLS GOLDMAN SACHS - MONEY MARKET MIC / BofA MONEY MARKET

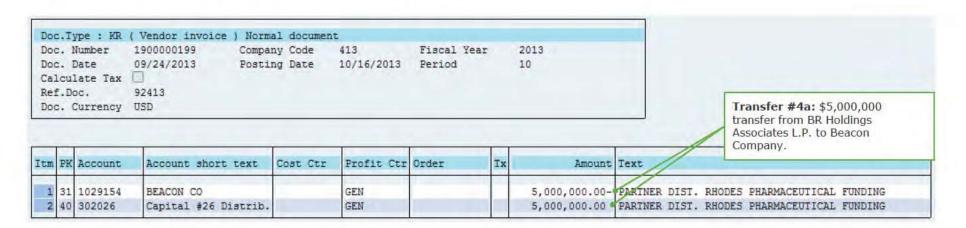
Source: SAP General Ledger detail

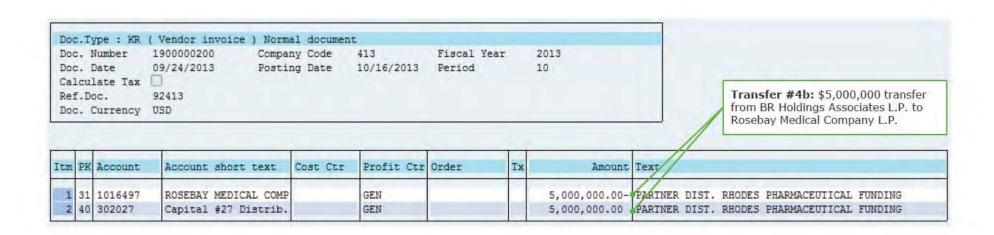


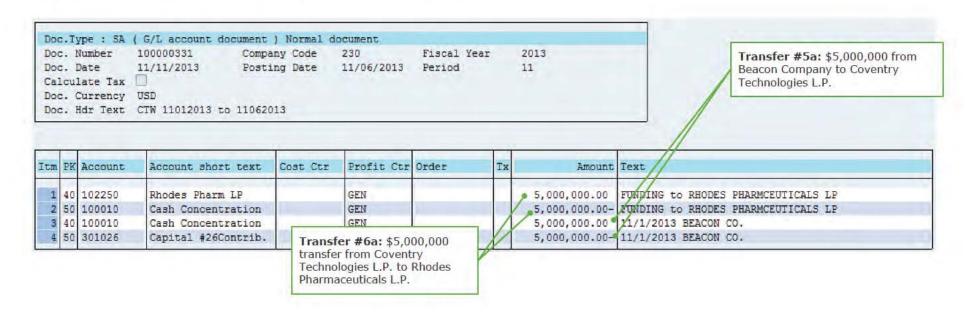


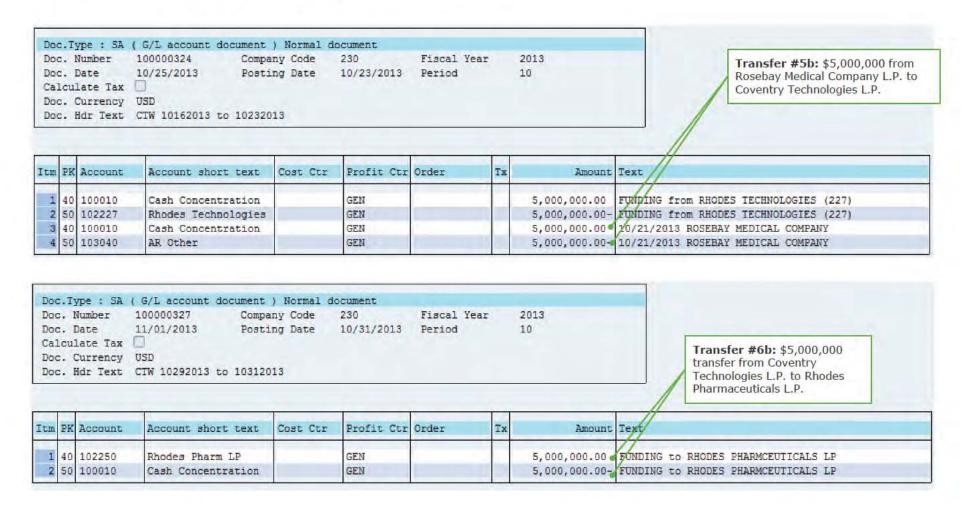


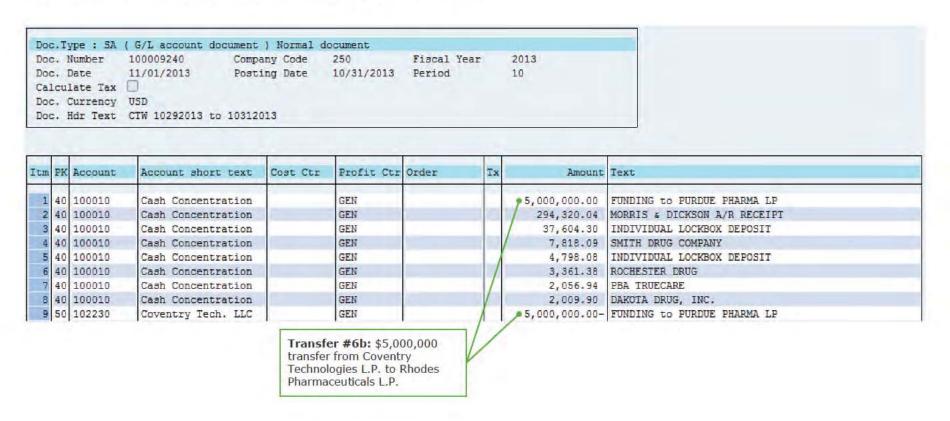
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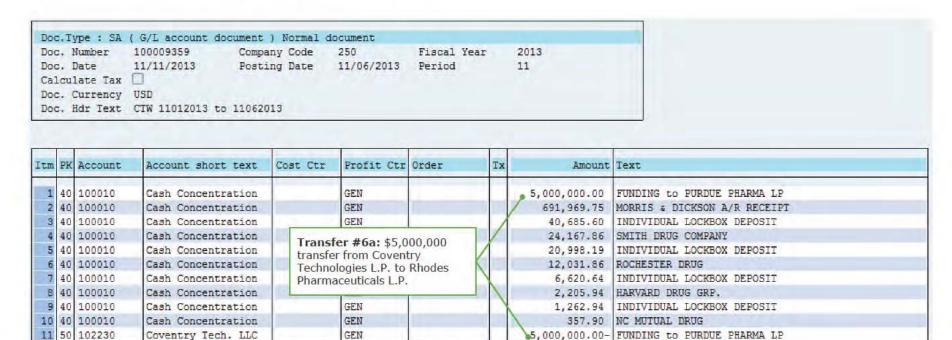


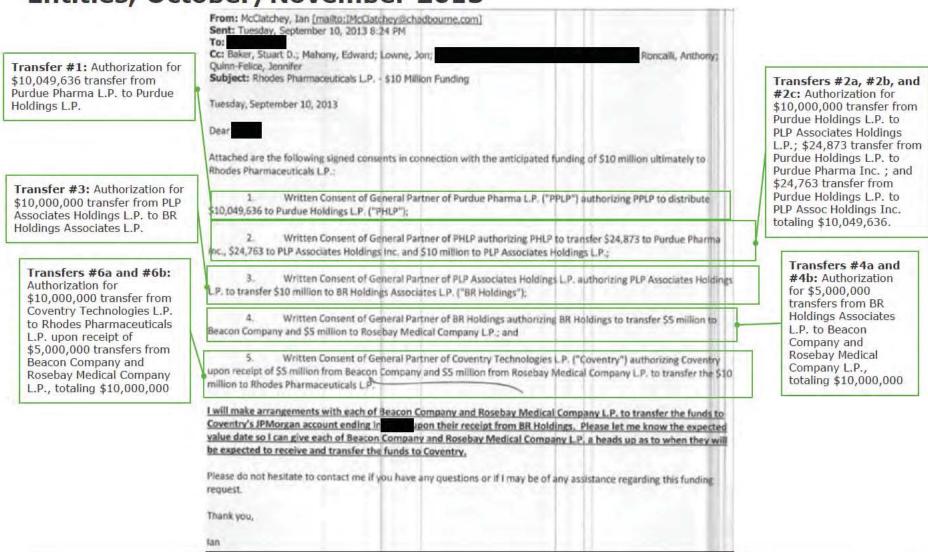


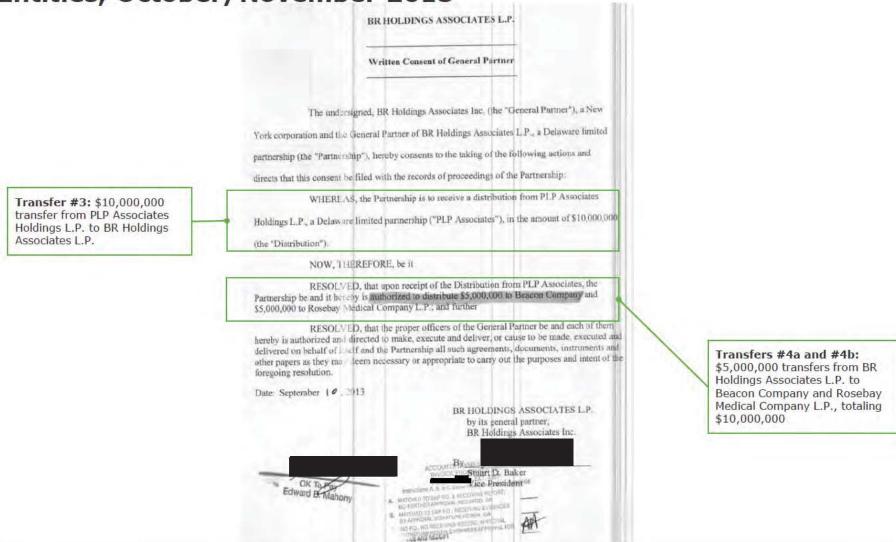












### **Alix**Partners

Exhibit G – Analysis of Distributions Referenced in the State Complaints Filed Against Purdue and/or the Sackler Family Members

# Exhibit G – Analysis of Distributions Referenced in Complaints, Objectives and Procedures Performed

#### **Objectives**

- 1. Review State Complaints filed against Purdue and/or Sackler Family members to identify allegations of distributions made by Purdue to or for the benefit of the Affiliated Entities.
- 2. Assess whether the distributions alleged in the State Complaints were or appear to have been included in Purdue's Internal Distribution Analysis and reconcile potential discrepancies.

#### **Procedures Performed**

1. Reviewed State Complaints filed against Purdue and/or Sackler Family members and identified the allegations of distributions made by Purdue to Affiliated Entities.

State	Original/Amended	Date of Complaint
Connecticut	Amended	May 6, 2019
Indiana	Original	May 21, 2019
Iowa	Original	May 16, 2019
Kansas	Original	May 16, 2019
Maryland	Original	May 16, 2019
Massachusetts	Amended	January 31, 2019
New Jersey	Original	May 30, 2019
New York	Amended	March 28, 2019
Oklahoma	Original	June 30, 2017
Oregon	Original	September 18, 2018
Pennsylvania	Original	May 15, 2019
West Virginia	Original	May 16, 2019
Wisconsin	Original	May 16, 2019

- 2. Quantified the dollar amounts of the distributions made by Purdue to Affiliated Entities as alleged in the State Complaints.
- 3. Reconciled the distributions made by Purdue to Affiliated Entities as alleged in the State Complaints to the distributions included in Purdue's Internal Distribution Analysis.

# **Exhibit G - Analysis of Distributions Referenced in Complaints - Observations and Findings**

- 1. For many of the distribution amounts alleged in the State Complaints, we identified either exact or similar dollar amounts at or around the same time period that were included in Purdue's Internal Distribution Analysis.
  - For identification of either exact or similar dollar amounts at or around the same time period, we assumed that those distributions referenced in the State Complaints were included in Purdue's Internal Distribution Analysis.
- 2. The State Complaints alleged inexact amounts and did not always provide sufficiently detailed information and/or references to supporting documentation in order to assess whether those distributions were included in Purdue's Internal Distribution Analysis.
  - We did not find any instances where distribution amounts alleged in the State Complaints during a
    particular time period exceeded distributions amounts reported in Purdue's Internal Distribution Analysis
    for that same time period.

# Exhibit G - Reconciled Distributions Alleged in State Complaints to Purdue's Internal Distribution Analysis

- 1. The following tables illustrates that the annual distribution amounts reported in Purdue's Internal Distribution Analysis exceeded the alleged distributions that were included in the State Complaints aggregated by year.
  - The following pages identified which individual distributions that were alleged in the State Complaints have been identified in Purdue's Internal Distribution Analysis. The remaining distributions in the State Complaints have been included in the column name "Complaints Unidentified Individual Distributions."
  - After taking into account the Unidentified Individual Distributions, the total annual distributions reported in Purdue's Internal Distribution Analysis exceeded all of the distributions that were alleged in the State Complaints for that same year.

Year	Complaints	Purdue's Internal Distribution Analysis	Complaints Sum of Individual Distributions by Year	Complaints Unidentified Alleged Distributions	Complaints Total Distributions
2008	MA, CT	\$ 1,292,135,359	\$ 1,125,000,000	\$ -	\$ 1,125,000,000
2009	MA	1,594,762,000	535,000,000	-	535,000,000
2010	MA	1,626,663,503	877,650,000	11,350,000	889,000,000
2011	MA	1,254,856,650	530,500,000	20,500,000	551,000,000
2012	MA, CT	1,057,103,806	242,000,000	176,200,000	418,200,000
2013	MA, CT, IN	953,850,252	59,930,000	339,990,000	399,920,000
2014	CT	832,658,451	73,367,059	89,632,941	163,000,000
2015	CT	906,330,390	205,358,000	-	205,358,000
2016	CT	566,875,000	107,000,000	69,142,000	176,142,000
2008-201	6 MA,CT,IN	\$ 10,085,235,411	\$ 3,755,805,059	\$ 706,814,941	\$ 4,462,620,000

# Exhibit G - Reconciled Distributions Alleged in State Complaints to Purdue's Internal Distribution Analysis

# Reconciliation of Distributions Listed in State Complaints to Purdue's Internal Distribution Analysis, Page 1 of 2

Result		Complaints Individual Distributions	١	Complaints Unidentified Alleged Distributions	Į	Total Distributions Amount	Period	Complaints	Page	1
In Purdue's Internal Distribution Analysis	\$	250.000.000	\$	_	\$	250.000.000	2008	MA	81	242
In Purdue's Internal Distribution Analysis	Ψ	325,000,000	Ψ	_	Ψ	325,000,000	2008	MA	83	251
In Purdue's Internal Distribution Analysis		275,000,000		_		275,000,000	2008	CT	42	153
In Purdue's Internal Distribution Analysis		275,000,000		_		275,000,000	2008	CT	42	153
Year: 2008	\$	1,125,000,000	\$	_	\$	1,125,000,000		<u> </u>		100
194112000	Ψ	.,,	<u> </u>		<u> </u>	.,,				
In Purdue's Internal Distribution Analysis	\$	200,000,000	\$	_	\$	200,000,000	2009	MA	83	253
In Purdue's Internal Distribution Analysis	·	162,000,000	·	-	•	162,000,000	2009	MA	85	259
In Purdue's Internal Distribution Analysis		173,000,000		-		173,000,000	2009	MA	87	265
Year: 2009	\$	535,000,000	\$	-	\$	535,000,000				
In Purdue's Internal Distribution Analysis	\$	236,650,000	\$	-	\$	236,650,000	2010	MA	97	292
In Purdue's Internal Distribution Analysis		141,000,000		-		141,000,000	2010	MA	98	295
In Purdue's Internal Distribution Analysis		260,000,000		-		260,000,000	2010	MA	110	327
In Purdue's Internal Distribution Analysis		240,000,000 <sup>1</sup>		-		240,000,000	2010	MA	108	320
Sum of Multiple Distributions Exceeds Complaint		-		11,350,000		11,350,000	2010	MA	113	336
Year: 2010	\$	877,650,000	\$	11,350,000	\$	889,000,000				
In Purdue's Internal Distribution Analysis	\$	189,700,000	\$	-	\$	189,700,000	2011	MA	115	340
In Purdue's Internal Distribution Analysis		200,000,000		-		200,000,000	2011	MA	121	357
In Purdue's Internal Distribution Analysis		140,800,000		-		140,800,000	2011	MA	122	363
Sum of Multiple Distributions Exceeds Complaint		-		20,500,000		20,500,000	2011	MA	123	365
Year: 2011	\$	530,500,000	\$	20,500,000	\$	551,000,000				
In Purdue's Internal Distribution Analysis	\$	129,000,000	\$	-	\$	129,000,000	2012	MA	265	866
In Purdue's Internal Distribution Analysis		113,000,000		-		113,000,000	2012	CT	42	153
Sum of Multiple Distributions Exceeds Complaint		-		176,200,000		176,200,000	2012	MA	265	886
Year: 2012	\$	242,000,000	\$	176,200,000	\$	418,200,000				

¹ The \$240 million distribution in 2010 includes a \$30 million distribution from Millsaw Realty L.P., apparently made at the direction of Purdue. The \$30 million distribution was not included in Purdue's combined audited financial statements, Internal Distributions Analysis or the October 19, 2018 MDL Presentation.

# **Exhibit G - Reconciled Distributions Alleged in State Complaints to Purdue's Internal Distribution Analysis**

Reconciliation of Distributions Listed in State Complaints to Purdue's Internal Distribution
Analysis, Page 2 of 2

Result		Complaints Individual Distributions		Complaints Unidentified Alleged Distributions		otal Distributions Amount	Period	Complaints	Page	1
In Purdue's Internal Distribution Analysis	\$	2,930,000	\$	_	\$	2,930,000	2013	СТ	41	151
In Purdue's Internal Distribution Analysis	Ψ	15,000,000	Ψ		Ψ	15,000,000	2013	CT	42	152
In Purdue's Internal Distribution Analysis		42,000,000		_		42.000.000	2013	IN	95	313
Sum of Multiple Distributions Exceeds Complaint		-		339,990,000		339,990,000	2013	MA	143	421
Year: 2013	\$	59,930,000	\$	339,990,000	\$	399,920,000	2010	170 (	110	
In Purdue's Internal Distribution Analysis	\$	367,059	\$		\$	367.059	2014	СТ	41	151
In Purdue's Internal Distribution Analysis	Ψ	57,400,000	Ψ	_	Ψ	57,400,000	2014	CT	41	151
In Purdue's Internal Distribution Analysis		15,600,000		_		15.600.000	2014	CT	41	151
Sum of Multiple Distributions Exceeds Complaint		-		89,632,941		89,632,941	2014	CT	42	154
Year: 2014	\$	73,367,059	\$	89,632,941	\$	163,000,000				
In Purdue's Internal Distribution Analysis	\$	710.500	Ф		\$	710.500	2015	СТ	41	151
In Purdue's Internal Distribution Analysis	φ	2,160,000	φ	-	φ	2,160,000	2015	CT	41	151
In Purdue's Internal Distribution Analysis		135,000,000		-		135,000,000	2015	CT	41	151
In Purdue's Internal Distribution Analysis		1.975.000		-		1.975.000	2015	CT	41	151
In Purdue's Internal Distribution Analysis		60,000,000		-		60,000,000	2015	CT	41	151
In Purdue's Internal Distribution Analysis		5,512,500		_		5,512,500	2015	CT	42	152
Year: 2015	\$	205,358,000	\$	-	\$	205,358,000	2010	01	72	102
In Purdue's Internal Distribution Analysis	ф.	107 000 000	Φ.		<u></u>	107.000.000	2016	СТ	44	151
•	\$	107,000,000	\$	-	\$	107,000,000	2016	CT	41 42	151 154
Sum of Multiple Distributions Exceeds Complaint Year: 2016	\$	107,000,000	\$	69,142,000 69,142,000	\$	69,142,000 176,142,000	2010	UI	42	154
1641. 2010	φ	107,000,000	φ	03,142,000	φ	170,142,000				
	\$	3,755,805,059	\$	706,814,941	\$	4,462,620,000	2008-2016			

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# **Exhibit H - Pension Benefits Detailed Procedures Performed**

#### Exhibit H - Pension Benefits, Detailed Procedures Performed

In order to achieve the objectives of the Pension Benefits Analysis, we performed the following procedures:

- 1. Obtained Purdue's Pension Plan document and other relevant information from Purdue for the purposes of quantifying the amount of Pension Benefits paid or owed to the Sackler Family members.
- 2. Identified the Sackler Family members referenced in these documents who received Pension Benefits or will become eligible to receive Pension Benefits.
- 3. Confirmed with Purdue's Director of Benefits and HRIS that no other Sackler Family members were or are eligible for Pension Benefits under Purdue's Pension Plan.
- 4. Reviewed and analyzed Deloitte's Pension Benefit calculation worksheets.
- 5. Reviewed Purdue's Pension Plan document in order to determine if the Sackler Family members who have been paid out under Purdue's Pension Plan as well as those who will receive future benefits appear eligible as defined in Purdue's Pension Plan document.

# **Alix**Partners

# **Exhibit I - Travel and Expense Reimbursements Detailed Procedures Performed**

#### Exhibit I – T&E Reimbursements, Detailed Procedures Performed

In order to achieve the objectives of the T&E Spend Analysis, we performed the following procedures:

- 1. Requested T&E report-level data for all Purdue T&E reimbursements paid on or after January 1, 2008 from Purdue's Controller and Assistant Manager of Corporate Travel.
  - Purdue was the only Purdue entity that paid T&E reimbursements to or on behalf of the Sackler Family members.
  - Purdue had records available for T&E reimbursements submitted through the current T&E system,
     Databasics, starting in April 2011. T&E reimbursement information prior to April 2011 has been archived and was not available.
- 2. Identified the Sackler Family members who submitted expense reports in Purdue's T&E system, Databasics, which went live in April 2011. No T&E reimbursements had been submitted by or paid to the Sackler Family members through the T&E reporting system after December 31, 2018.
- 3. Requested individual line-item detail within expense reports for the Sackler Family members from Purdue's Assistant Manager of Corporate Travel. Reviewed transactions and summarized expenses by year, expense category (as defined by Purdue), Sackler Family member name, and reimbursement type (paid American Express company credit card vs. reimbursed a Sackler Family member directly).<sup>1</sup>
  - Expense categories were taken directly from Purdue's T&E reporting system and relied on.
  - Reviewed receipts/supporting documentation submitted through Databasic with T&E reports for approximately 73% of the total dollar amount of reimbursements made to or for the benefit of the Sackler Family members. Criteria used for selections can be found on the following page.
    - Selected 343 items included in the T&E reports totaling approximately \$849,000 to determine if the expense reports contained documentation supporting the T&E reimbursements.
    - Of the 343 expenses selected, 341 (or 99.4%) items included underlying receipts/supporting documentation. This represented 99.97% of the total dollar amount of T&E reimbursements selected for review.
  - No assessment of the business reasonableness of the expenses was made.
  - No assessment of whether expenses were in compliance with Purdue's T&E policies was made.

<sup>&</sup>lt;sup>1</sup> Sackler Family members were issued American Express Corporate Credit Cards in their own names, which Purdue paid directly to American Express upon submission of expense reports. Purdue also issued Procurement Cards to various employees, however, none were issued to Sackler Family members.

### Exhibit I – T&E Reimbursements, Detailed Procedures Performed

4. Criteria for selecting the receipts/supporting documentation from Purdue's T&E reporting system for review was as follows:

Cate	egory	Selection Criteria
Airline		Amounts over \$5,000
HCP (Health Car	e Professional)	Amounts over \$500
Hotel		
	Due to Employee	Amounts over \$500
	Due to Card	Amounts over \$1,000
Meals (Self)		
	Due to Employee	Amounts over \$100
	Due to Card	Amounts over \$100
Meals and Enter	tainment	
	Due to Employee	Amounts over \$500
	Due to Card	Amounts over \$500
Taxi/Car/Ground	I Transportation	
	Due to Employee	Amounts over \$400
	Due to Card	Amounts over \$400
Miscellaneous		
	Due to Employee	Amounts over \$300
	Due to Card	Amounts over \$300

5. Identified payments made directly to the Sackler Family members recorded as T&E reimbursements in Purdue's SAP accounts payable ledger on or after January 1, 2008. No T&E reimbursements had been submitted by or paid to the Sackler Family members through accounts payable after March 31, 2019.

#### Exhibit I – T&E Reimbursements, Detailed Procedures Performed

- 6. Reviewed documentation in SAP supporting T&E reimbursements paid through accounts payable, and assigned an expense category to each T&E reimbursement to the extent sufficient detail was available in Purdue's SAP accounting system.
  - Purdue's SAP accounting system included invoices, other supporting documentation and/or descriptions for approximately 87% of the total dollar amount of T&E reimbursements paid to the Sackler Family members through accounts payable.
- 7. Obtained and reviewed Purdue's Travel Policy and Procedures in effect during the years 2008 through 2018.
- 8. Held meetings and/or communicated with Purdue employees regarding the T&E policy and reimbursement process and to gain an understanding of the accounting for and quantification of T&E reimbursements paid by Purdue.
  - A list of the Purdue employees we met with and/or communicated with about T&E reimbursements is included in Appendix A.

# **Alix**Partners

# XI. Appendix

# **Index of Appendices**

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# **Alix**Partners

Appendix A - Detailed List of Sources Relied Upon

### **Appendix A – Detailed List of Sources Relied Upon**

In order to achieve the objectives of the Cash Transfers of Value Analysis, we accessed and reviewed various types of sources of information from Purdue, TXP and One Stamford Realty that we used and relied on when performing our procedures.

#### 1. Entity Organizational Charts

- Organizational charts for the Purdue and Rhodes entities and certain Affiliated Entities.

#### 2. SAP Accounting System Information

- SAP company numbers and names, and chart of accounts: Financial Tables.xlsx.
- SAP general ledger detail.
- SAP master vendor table.
- SAP accounts payable ledger.
- SAP accounts receivable ledger.
- SAP cost center detail and list of customer codes.

#### 3. Purdue Internally Prepared Distribution Reports

- The October 19, 2018 MDL Presentation.
- Purdue's Internal Distribution Analysis (see Excel file named: Distributions 1995 to 2017 Actuals v7.xlsx).
- Purdue's Notes Receivable schedule of historical activity (see Excel file named: PRALP-PPLP Notes Receivable Historical Activity through 7.31.2019v2.xlsx).
- Rhodes's Internal Distribution Analysis (see Excel files below):
  - o Coventry History Cash Flow Statement\_since inception 2018 Revised\_05202019.xlsx.
  - o Coventry Tax Distributions LTD 2008 2018.xlsx.

#### 4. Financial Statements

- Purdue's audited financial statements for the years ended December 31, 2008 through December 31, 2017, and unaudited financial statements for the year ended December 31, 2018.<sup>1</sup>
- Purdue and Rhodes's combined audited financial statements for the years ended December 31, 2014 through 2015.
- Rhode's audited financial statements for the year ended December 31, 2016.
- Internal financial statements, reports and/or SAP accounting records for PPLP, Rhodes, PPI, PLP
   Associates Holdings Inc. and other Affiliated Entities whose books and records are maintained in the same
   SAP accounting system as Purdue's.

#### 5. Purdue's Accounting and Approval Documentation

- Treasury department's records with transaction information and other accounting records.
- Wire instructions, bank statements, weekly bank transaction reports and bank account check clearing reconciliations.
- Written Consents and other documents from the general partners authorizing distributions.
- Other accounting records and approval documentation available in the SAP accounting system.
- Tax calculations by Purdue's Tax Department (now TXP).
- Information obtained from discussions and communications with Purdue and TXP employees.

#### 6. State Complaints

- Complaints filed by various states against Purdue and/or the Sackler Family members:

State	Original/Amended	Date of Complaint
Connecticut	Amended	May 6, 2019
Indiana	Original	May 21, 2019
Iowa	Original	May 16, 2019
Kansas	Original	May 16, 2019
Maryland	Original	May 16, 2019
Massachusetts	Amended	January 31, 2019
New Jersey	Original	May 30, 2019
New York	Amended	March 28, 2019
Oklahoma	Original	June 30, 2017
Oregon	Original	September 18, 2018
Pennsylvania	Original	May 15, 2019
West Virginia	Original	May 16, 2019
Wisconsin	Original	May 16, 2019

#### 7. Payroll Records

- Purdue payroll report detail.

#### 8. Legal Expense Reports Prepared by Purdue's Legal Operations Department

- File provided by Legal Operations containing expenses paid to law firms that represent Sackler Family members under the Corporate Indemnity Policy. These reports listed the name of each law firm paid and the amounts invoiced to Purdue and did not include any detail as to the work performed.
- File describing all of Purdue's corporate policies and requirements related to legal invoice processing.
- Copy of the Directors and Officers liability insurance policy.
- Minutes from the November 19, 2004 Board of Directors meeting of PPI, at which time the Corporate
  Indemnity Policy was adopted. The full text of the Corporate Indemnity Policy is incorporated into the
  minutes from that meeting.

#### 9. Pension Records

- Pension Benefit Calculation Worksheets prepared by Deloitte.
- Purdue's Pension Plan Document.

#### 10. Purdue Expense Reports

- Purdue's T&E reports from Databasics from April 2011 through December 31, 2018, including individual lineitems from expense reports and available supporting documentation.
- Purdue's SAP account payable detail and available supporting documentation related to expense reimbursements from January 1, 2008 through December 31, 2018.
- Purdue's Travel Policy and Procedures in effect during the years 2008 through 2018.
- Transaction detail related to Purdue's cellular phone plan costs.
- Transaction detail related to Purdue's fleet vehicle costs, personal service employees expenses and the reimbursements of such.

#### 11. Meetings with employees of Purdue, PPI, Rhodes, TXP and One Stamford Realty

Title	Company	Category
Associate General Counsel	PPLP	Compensation, Legal, and Pension
Sr. Manager, Payroll Services	PPLP	Compensation
Controller	PPLP	Cash Distributions and Travel & Expense
Assistant Manager of Corporate Travel	PPLP	Travel & Expense
Director of Law Department Operations	PPLP	Legal
Director, Benefits and HRIS	PPLP	Pension
Associate Director, SG&A Finance	PPLP	Travel & Expense
Senior Vice President and Chief Financial Officer	PPLP and PPI	Cash Distributions, Compensation, Legal and Pension
Senior Legal Analyst	PPLP	Legal
Associate General Counsel	PPLP	Legal
Treasurer & Director Business Development Finance	PPLP	Cash Distributions
Vice President Finance	Rhodes	Cash Distributions
Associate Treasury Analyst	TXP	Fringe Benefits
Transactions and Compliance Manager	TXP	Cash Distributions
Director, Finance and Accounting	TXP	Cash Distributions, Compensation and Travel & Expense
Vice President of Finance for PRALP	TXP	Fringe Benefits
Associate Director, Tax	TXP	Cash Distributions
Accounting Services, Manager	TXP	Travel & Expense
Associate Director	One Stamford Realty	Fringe Benefits

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Appendix B - List of the Sackler Family Members

### **Appendix B - List of Sackler Family Members**

Name	Purdue Director Begin Date	Purdue Director End Date
Jonathan D. Sackler	10/2/1990	12/8/2018
Ilene Sackler Lefcourt	10/2/1990	10/9/2018
Kathe A. Sackler	10/2/1990	9/27/2018
Richard S. Sackler	10/2/1990	7/24/2018
Raymond R. Sackler	10/2/1990	7/17/2017
Mortimer D. Sackler	10/2/1990	3/24/2010
Mortimer D.A. Sackler	1/15/1993	1/16/2019
Theresa E. Sackler	1/15/1993	9/7/2018
Beverly Sackler	1/15/1993	10/17/2017
Samantha (Sackler) Hunt	1/15/1993	3/8/2003
David A. Sackler	7/19/2012	8/14/2018

Family Member	Relationship	Title at Purdue (if applicable)
Mark Sackler		Delphian Sales Manager
Karen Lefcourt-Taylor		Consultant
Jeffrey Lefcourt		Consultant
Marianna Sackler	Daughter of Richard S. Sackler	Consultant
Henry Sackler		
Miles Sackler		Summer Intern
Rebecca Sackler	Daughter of Richard S. Sackler	Consultant
Benjamin Shack-Sackler	Son of Kathe A. Sackler	Summer Intern
Julia Shack-Sackler	Daughter of Kathe A. Sackler	Summer Intern
Muriel Sackler	Wife of Mortimer D. Sackler	
Susan Sackler	Wife of Kathe A. Sackler	
Ben Taylor	Husband of Karen Lefcourt-Taylor	
Beth Sackler	Ex-wife of Richard S. Sackler	

Source: Purdue's Legal Department

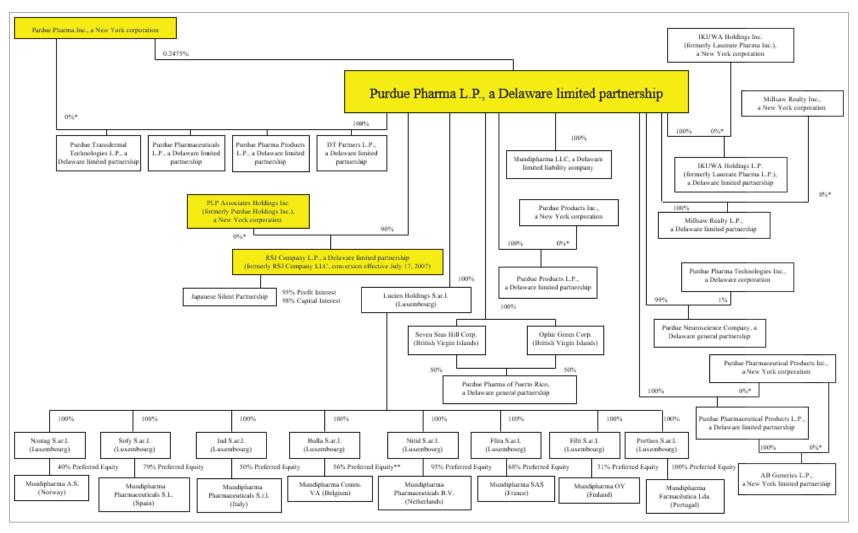
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#### **Alix**Partners

# **Appendix C - Purdue Organizational Charts and Ownership Structure**

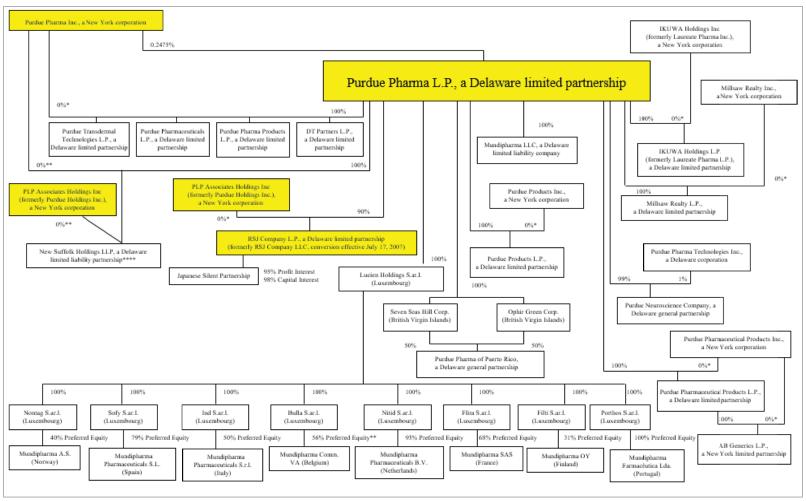
### Appendix C - Purdue Pharma L.P. Subsidiaries, January 1, 2008 through February 14, 2008



<sup>\*</sup> General Partner has no equity interest in LP, rather the General Partner receives a service fee for acting as General Partner

<sup>\*\*</sup> The preferred stock has been characterized as Preferred Stock A and Preferred Stock B Bulla S àr 1 holds 100% of Preferred Stock A and Lymit Holdings S àr 1 holds 100% of Preferred Stock B The percentages represent the total preferred stock

### Appendix C - Purdue Pharma L.P. Subsidiaries, February 15, 2008 through December 31, 2008



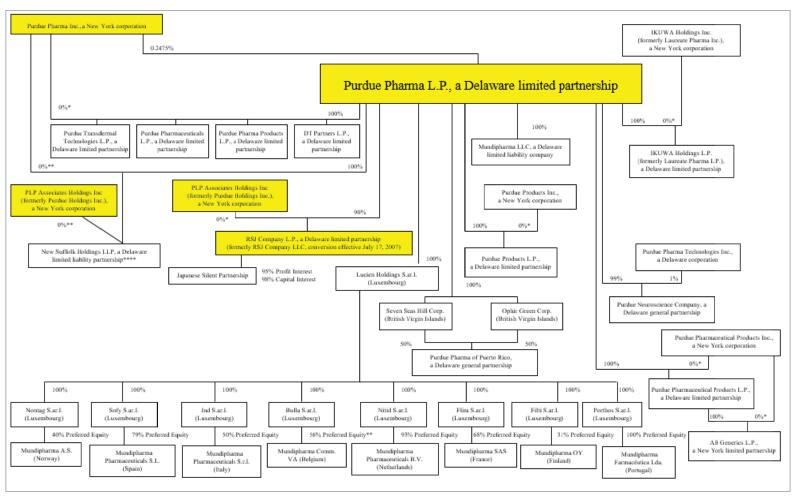
<sup>\*</sup> General Partner has no equity interest in LP, rather the General Partner receives a service fee for acting as General Partner

<sup>\*\*</sup>Partner has no equity interest in LLP, rather the Partner receives a service fee for acting as a Partner

<sup>\*\*\*</sup> The preferred stock has been characterized as Preferred Stock A and Preferred Stock B Bulla S år 1 holds 100% of Preferred Stock A and Lymit Holdings S år 1 holds 100% of Preferred Stock B The percentages represent the total preferred stock

<sup>\*\*\*\*</sup> Effective as of January 1, 2008, New Suffolk Holdings LLP will invest up to €30 7 million as a silent partner in Mundipharma Vertriebsgesellschaft mbH & Co KG This silent partnership ends on December 31, 2030

# Appendix C - Purdue Pharma L.P. Subsidiaries, January 1, 2009 through April 29, 2010



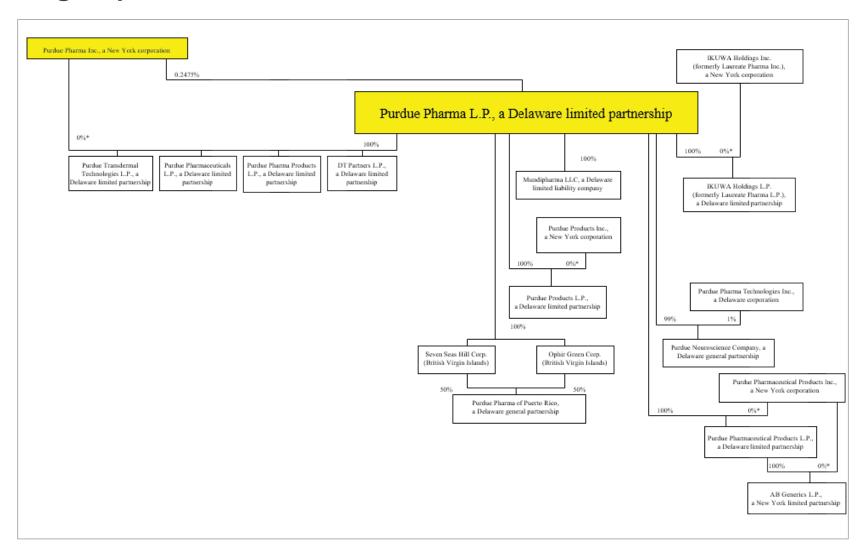
<sup>\*</sup> General Partner has no equity interest in LP, rather the General Partner receives a service fee for acting as General Partner

<sup>\*\*</sup>Partner has no equity interest in LLP, rather the Partner receives a service fee for acting as a Partner

<sup>\*\*\*</sup> The preferred stock has been characterized as Preferred Stock A and Preferred Stock B Bulla S år 1 holds 100% of Preferred Stock A and Lymit Holdings S år 1 holds 100% of Preferred Stock B The percentages represent the total preferred stock

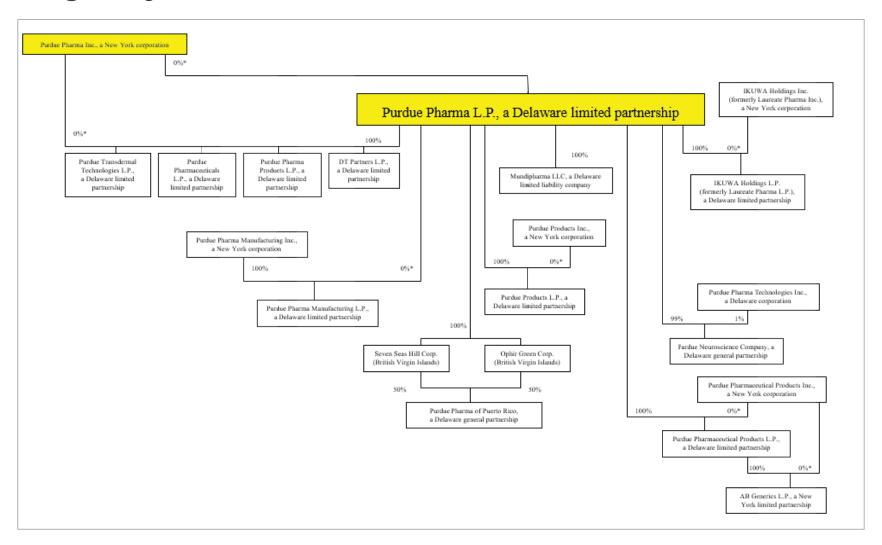
<sup>\*\*\*\*</sup> Effective as of January 1, 2008, New Suffolk Holdings LLP will invest up to €30 7 million as a silent partner in Mundipharma Vertriebsgesellschaft mbH & Co KG This silent partnership ends on December 31, 2030

### Appendix C - Purdue Pharma L.P. Subsidiaries, April 30, 2010 through April 8, 2013



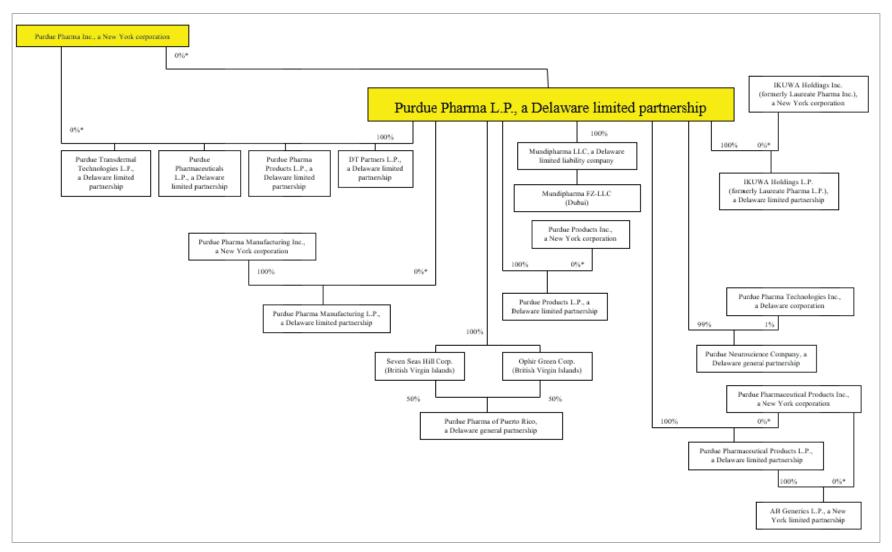
<sup>\*</sup> General Partner has no equity interest in LP, rather the General Partner receives a service fee for acting as General Partner

# Appendix C - Purdue Pharma L.P. Subsidiaries, April 9, 2013 through July 8, 2014



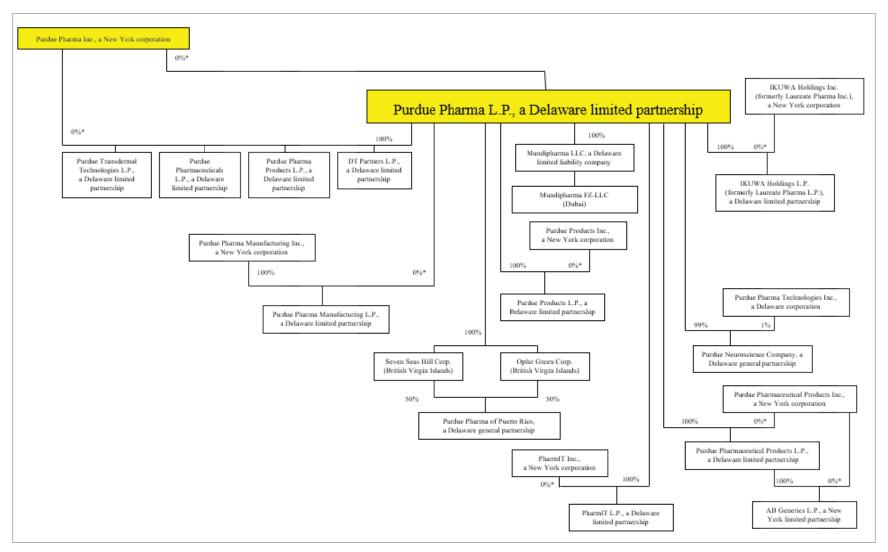
<sup>\*</sup> General Partner has no equity interest in LP, rather the General Partner receives a service fee for acting as General Partner

# Appendix C - Purdue Pharma L.P. Subsidiaries, July 9, 2014 through September 1, 2014



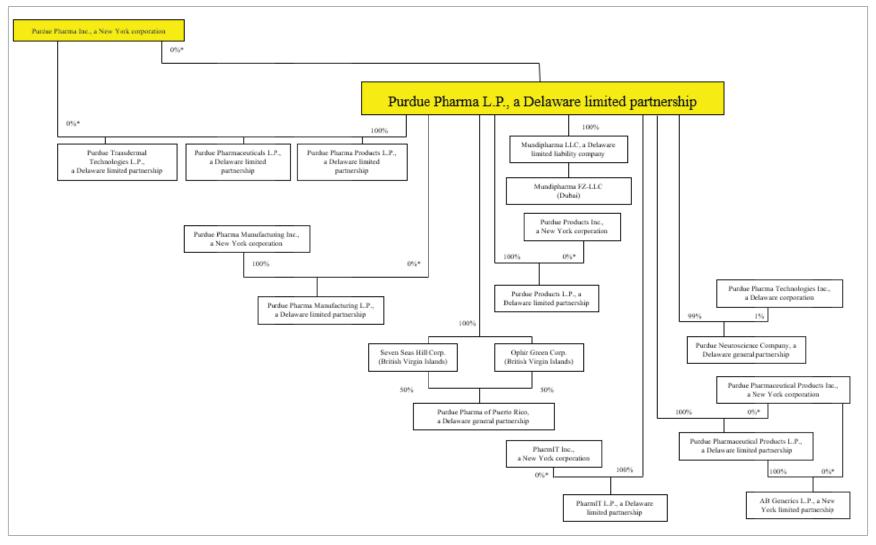
<sup>\*</sup> General Partner has no equity interest in LP, rather the General Partner receives a service fee for acting as General Partner

### Appendix C - Purdue Pharma L.P. Subsidiaries, September 2, 2014 through December 17, 2015



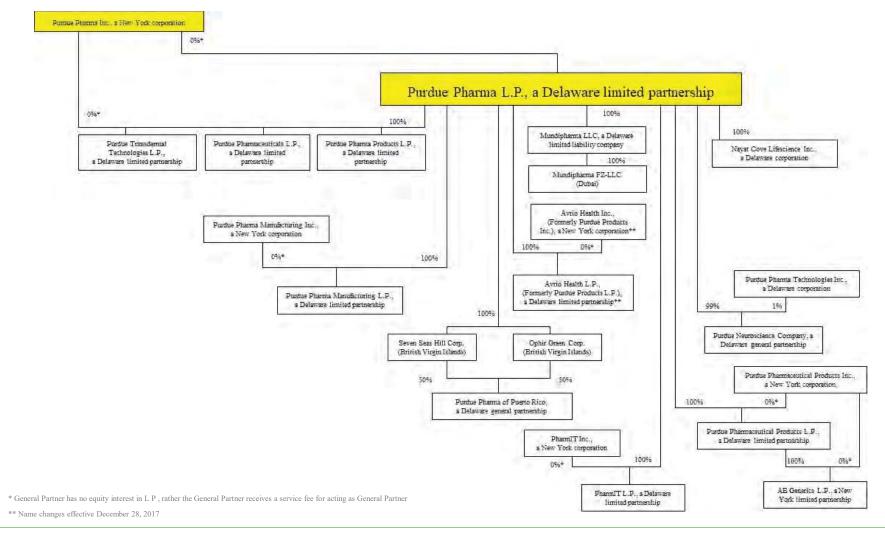
<sup>\*</sup> General Partner has no equity interest in LP, rather the General Partner receives a service fee for acting as General Partner

### Appendix C - Purdue Pharma L.P. Subsidiaries, December 18, 2015 through November 20, 2017

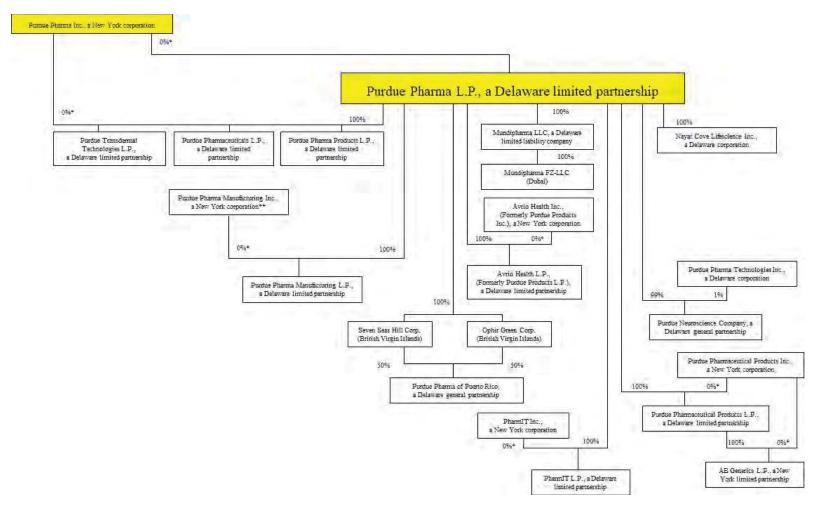


<sup>\*</sup> General Partner has no equity interest in LP, rather the General Partner receives a service fee for acting as General Partner

# Appendix C - Purdue Pharma L.P. Subsidiaries, November 21, 2017 through August 19, 2018



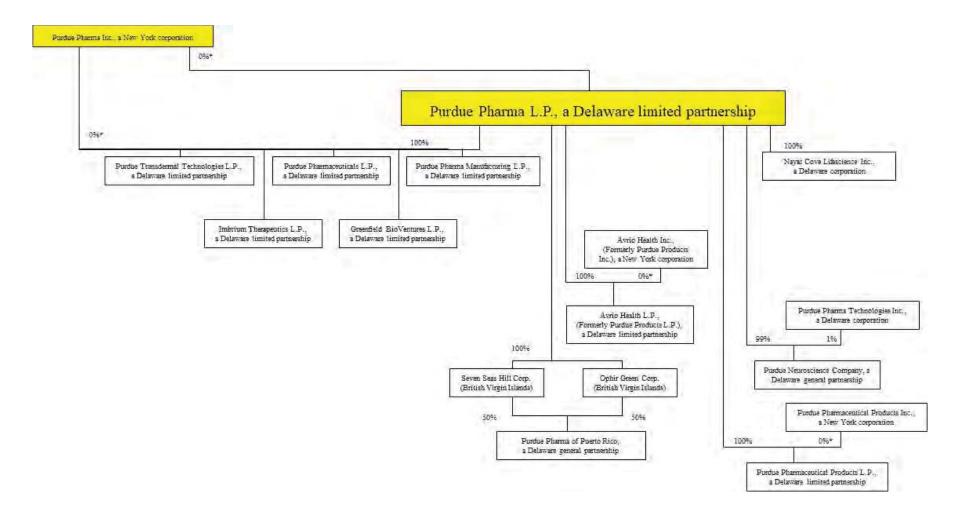
# Appendix C - Purdue Pharma L.P. Subsidiaries, August 20, 2018 through September 10, 2018



<sup>\*</sup> General Partner has no equity interest in LP, rather the General Partner receives a service fee for acting as General Partner

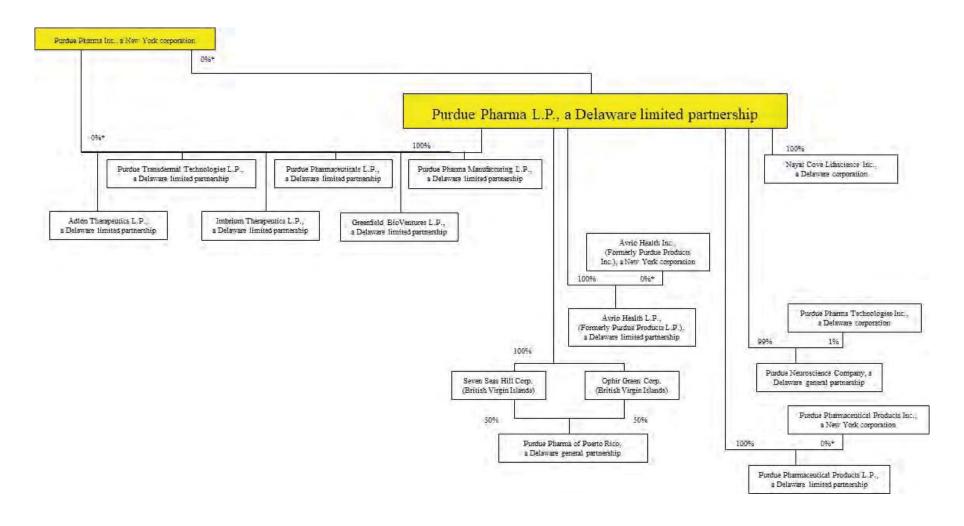
<sup>\*\*</sup> Purdue Pharma Inc replaces Purdue Manufacturing Inc as general partner effective August 23, 2018

# Appendix C - Purdue Pharma L.P. Subsidiaries, September 11, 2018 through October 29, 2018



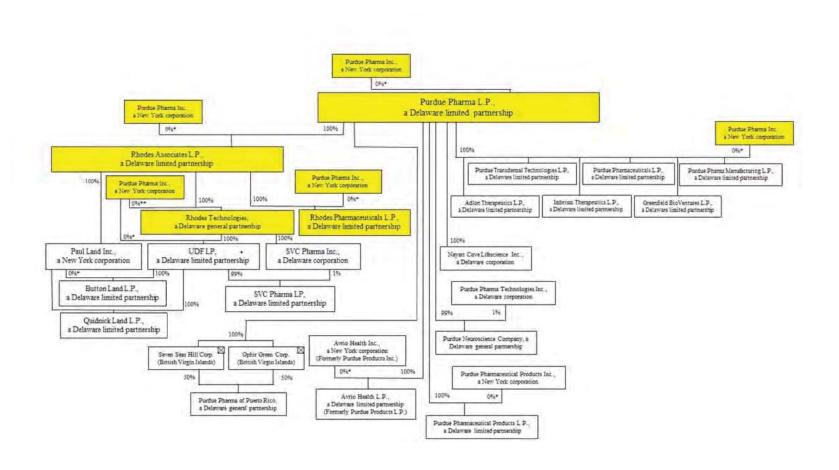
<sup>\*</sup> General Partner has no equity interest in LP, rather the General Partner receives a service fee for acting as General Partner

### Appendix C - Purdue Pharma L.P. Subsidiaries, October 30, 2018 through May 27, 2019



 $<sup>{\</sup>color{blue}*} \ General \ Partner \ has \ no \ equity \ interest \ in \ L \ P \ , \ rather \ the \ General \ Partner \ receives \ a \ service \ fee \ for \ acting \ as \ General \ Partner \ receives \ a \ service \ fee \ for \ acting \ as \ General \ Partner \ receives \ a \ service \ fee \ for \ acting \ as \ General \ Partner \ fee \ for \ acting \ as \ General \ Partner \ fee \ for \ acting \ as \ General \ Partner \ fee \ for \ acting \ as \ General \ Partner \ fee \ for \ acting \ as \ General \ Partner \ fee \ for \ acting \ as \ General \ Partner \ fee \ for \ acting \ as \ General \ Partner \ fee \ for \ acting \ as \ General \ Partner \ fee \ for \ acting \ as \ General \ Partner \ fee \ fee \ for \ acting \ fee \ fee \ fee \ for \ acting \ fee \ fee$ 

# Appendix C - Purdue Pharma L.P. Ownership and Subsidiaries, May 28, 2019 to Present

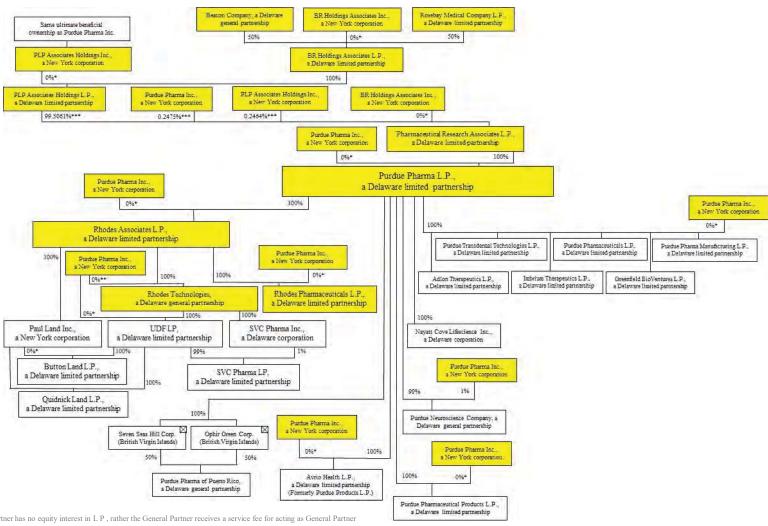


<sup>\*</sup> General Partner has no equity interest in L P, rather the General Partner receives a service fee for acting as General Partner

<sup>\*\*</sup> Partner has no equity interest in LLP, rather the Partner receives a service fee for acting as a Partner

<sup>\*\*\*</sup> BR Holdings Associates Inc is the general partner of Pharmaceutical Research Associates L P; Purdue Pharma Inc , PLP Associates Holdings Inc and PLP Associates Holdings L P are the limited partners of Pharmaceutical Research Associates L P

#### Appendix C - Current Purdue Pharma L.P. Ownership and **Subsidiaries**



General Partner has no equity interest in L P, rather the General Partner receives a service fee for acting as General Partner

Partner has no equity interest in LLP, rather the Partner receives a service fee for acting as a Partner

<sup>\*\*\*</sup> BR Holdings Associates Inc is the general partner of Pharmaceutical Research Associates L P; Purdue Pharma Inc , PLP Associates Holdings Inc and PLP Associates Holdings L P are the limited partners of Pharmaceutical Research Associates L P

#### **Alix**Partners

# **Appendix D – Purdue Company Names and SAP Account Information**

# **Appendix D - Cash Distribution Testing Selections – Purdue's SAP Company Names**

Company Number	Company Name	Description
208	Purdue Pharma L.P.	
301	Purdue Pharma Inc.	General Partner of Purdue Pharma L.P.
401	PLP Associates Holdings L.P.	Limited Partner of Purdue Holdings L.P. (name changed in 2018 to PRA L.P.)
402	PLP Associates Holdings Inc.	General Partner of Purdue Holdings L.P. (name changed in 2018 to PRA L.P.)
408	RSJ Company L.P.	Limited Partner of Mudipharma KK (Japan)
413	BR Holdings Associates L.P.	Limited Partner of PLP Associates Holdings L.P.
414	BR Holdings Associates Inc.	General Partner of BR Holdings Associates L.P.
416	Purdue Holdings L.P. (name changed in 2018 to PRA L.P.)	Limited Partner of Purdue Pharma L.P.
NA	Rosebay Medical Company L.P.	Limited Partner of BR Holdings Associates L.P. (50%)
NA	Beacon Company	Limited Partner of BR Holdings Associates L.P. (50%)
NA	Mexcus Corporation	Affiliated Entity (Ex-US)
NA	Maltus Corporation	Affiliated Entity (Ex-US)
NA	Mundipharma KK	Affiliated Entity (Ex-US)
NA	Clovio Corp.	Affiliated Entity (Ex-US)
NA	Lucien Holdings S.ar.l.	Affiliated Entity (Ex-US)

Note: The books and records for these entities are not maintained in the same SAP accounting system as Purdue.

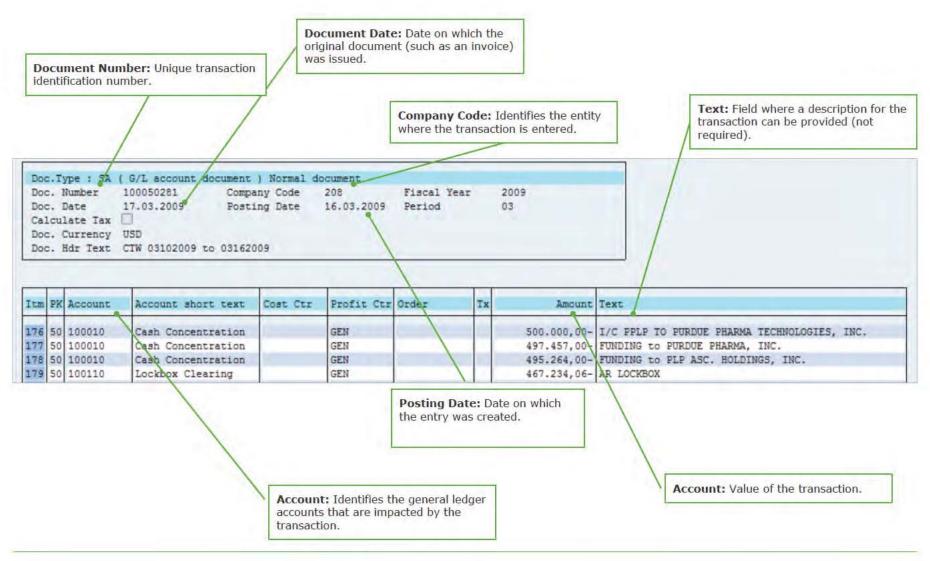
# **Appendix D - Cash Distribution Testing Selections – Purdue's SAP Account Descriptions**

SAP Number	Account Type	SAP "Short Text"
100010	Asset - Cash	Cash Concentration
102208	Due from Associated Company	Purdue Pharma L.P.
102301	Due from Associated Company	Purdue Pharma Inc.
102401	Due from Associated Company	PLP Assoc Holdings
102413	Due from Associated Company	BR Holdings Assoc L.P.
102416	Due from Associated Company	Purdue Holdings L.P.
107401	Long Term Asset	Invest. PLP Asc. Hold
107204	Long Term Asset	Invest - Purdue
107408	Long Term Asset	Invest. RSJ Com LLC
107416	Long Term Asset	Invest - PH L.P.

# **Appendix D - Cash Distribution Testing Selections – Purdue's SAP Account Descriptions**

SAP Number	Account Type	SAP "Short Text"	Description
302042	Equity Account	Dist #42 PP Inc	Distribution to Purdue Pharma Inc.
302045	Equity Account	Dist #45 PH L.P.	Distribution to Purdue Holdings L.P.
302044	Equity Account	Dist #44 PLPAH L.P.	Distribution to PLP Associates Holdings Inc.
302032	Equity Account	Capital #32 Dist BR	Distribution to BR Holdings Associates L.P.
1018449	Vendor	BEACON TRUST COMPANY	SAP Number = Vendor Number
1004240	Vendor	UNITED STATES TREASURY	SAP Number = Vendor Number
1032548	Vendor	CLOVIO CORP	SAP Number = Vendor Number
1019140	Vendor	LUCIEN HOLDINGS SARL	SAP Number = Vendor Number
1016497	Vendor	ROSEBAY MEDICAL COMPANY LP	SAP Number = Vendor Number
1029154	Vendor	BEACON CO	SAP Number = Vendor Number
1033027	Vendor	MALTUS CORPORATION	SAP Number = Vendor Number
1033026	Vendor	MEXCUS CORPORATION	SAP Number = Vendor Number

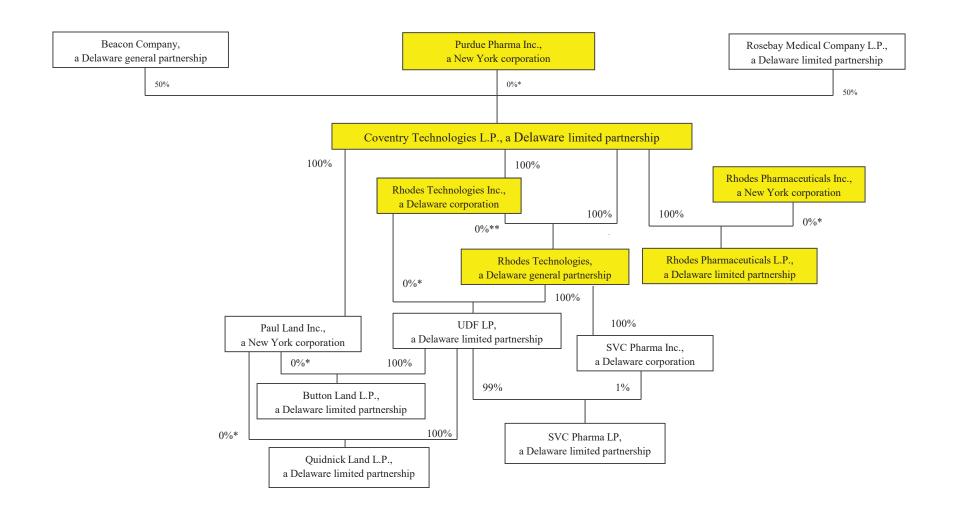
#### Appendix D - SAP Screenshot Guide for Purdue



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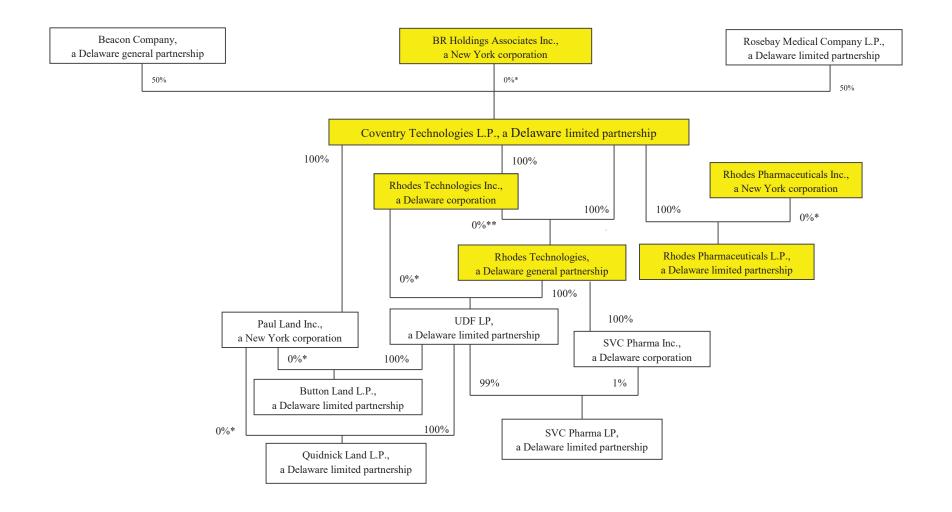
# **Appendix E – Rhodes Organizational Charts and Ownership Structure**

## Appendix E – Rhodes Ownership and Subsidiaries Effective January 1, 2008 through August 19, 2018



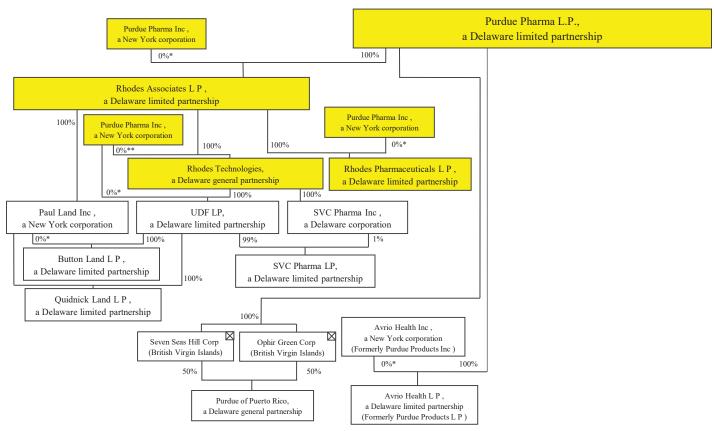
<sup>\*</sup>General Partner has no equity interest in L P, rather the General Partner receives a service fee for acting as General Partner

### Appendix E – Rhodes Ownership and Subsidiaries Effective August 20, 2018 through May 27, 2019



<sup>\*</sup>General Partner has no equity interest in LP, rather the General Partner receives a service fee for acting as General Partner

### Appendix E – Rhodes Ownership and Subsidiaries Effective May 28, 2019 to Present



<sup>\*</sup> General Partner has no equity interest in LP, rather the General Partner receives a service fee for acting as General Partner

<sup>\*\*</sup> Partner has no equity interest in LLP, rather the Partner receives a service fee for acting as a Partner

<sup>\*\*\*</sup> BR Holdings Associates Inc is the general partner of Pharmaceutical Research Associates L P; Purdue Pharma Inc, PLP Associates Holdings Inc and PLP Associates Holdings L P are the limited partners of Pharmaceutical Research Associates L P

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# **Appendix F - Rhodes Company Names and SAP Account Information**

# Appendix F - Rhodes Cash Distribution and Capital Contribution Testing Selections - SAP Company Names

Company Number	Company Name	Description
208	Purdue Pharma L.P.	
227	Rhodes Technologies	
230	Coventry Technologies L.P.	
250	Rhodes Pharmaceuticals L.P.	
301	Purdue Pharma Inc.	General Partner of Purdue Pharma L.P.
401	PLP Associates Holdings L.P.	Limited Partner of Purdue Holdings L.P. (name changed in 2018 to PRA L.P.)
402	PLP Associates Holdings Inc.	General Partner of Purdue Holdings L.P. (name changed in 2018 to PRA L.P.)
413	BR Holdings Associates L.P.	Limited Partner of PLP Associates Holdings L.P.
414	BR Holdings Associates Inc.	General Partner of BR Holdings Associates L.P.
416	Purdue Holdings L.P. (name changed in 2018 to PRA L.P.)	Limited Partner of Purdue Pharma L.P.
NA	Rosebay Medical Company L.P.	Limited Partner of BR Holdings Associates L.P (50%)
NA	Beacon Company	Limited Partner of BR Holdings Associates L.P (50%)

**Note:** The books and records for these entities are not maintained in the same SAP accounting system as Purdue and Rhodes.

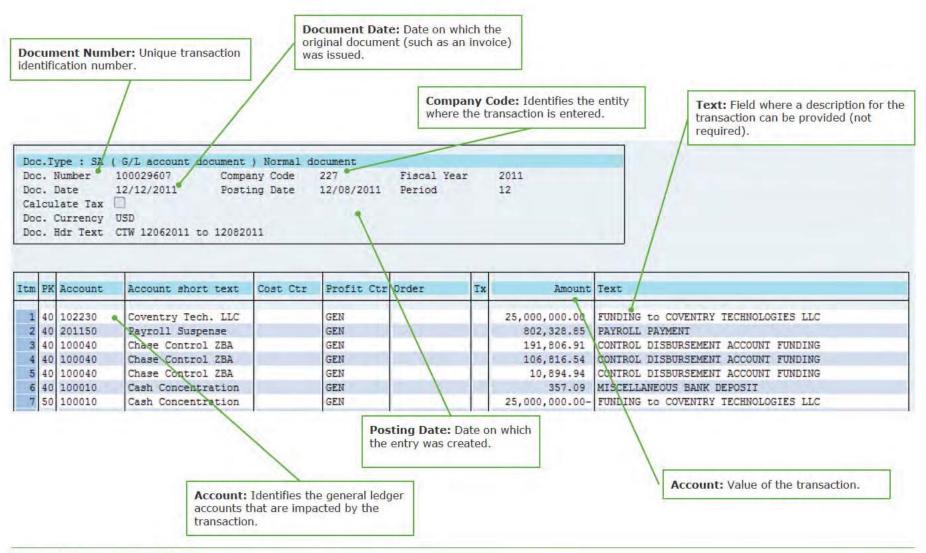
# Appendix F - Rhodes Cash Distribution and Capital Contribution Testing Selections - SAP Account Descriptions

SAP Number	Account Type	SAP "Short Text"
100010	Asset - Cash	Cash Concentration
102208	Due from Associated Company	Purdue Pharma L.P.
102227	Due from Associated Company	Rhodes Technologies
102230	Due from Associated Company	Coventry Technologies LLC
102250	Due from Associated Company	Rhodes Pharmaceuticals LP
102301	Due from Associated Company	Purdue Pharma Inc.
102401	Due from Associated Company	PLP Assoc Holdings
102413	Due from Associated Company	BR Holdings Assoc L.P.
102416	Due from Associated Company	Purdue Holdings L.P.
107401	Long Term Asset	Investment PLP Associates Holding LP

# Appendix F - Rhodes Cash Distribution and Capital Contribution Testing Selections - SAP Account Descriptions

SAP Number	Account Type	SAP "Short Text"
107204	Long Term Asset	Investment Purdue
107416	Long Term Asset	Investment in Purdue Holdings LP
301026	Equity Account	Capital #26 Contribution Reigo Company
301027	Equity Account	Capital #27 Distribution Rosebay
302026	Equity Account	Capital #26 Distribution Beacon Company
302042	Equity Account	Distribution #42 Purdue Pharma Inc.
302045	Equity Account	Distribution #45Purdue Holdings LP
302044	Equity Account	Distribution #44 PLP Assoc. Holdings LP
302032	Equity Account	Capital #32 Distribution BR
1016497	Vendor	ROSEBAY MEDICAL COMPANY LP
1029154	Vendor	BEACON CO

#### Appendix F - SAP Screenshot Guide for Rhodes Technologies



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# XII. Disclaimer and Statement of Limiting Conditions

#### XII. Disclaimer and Statement of Limiting Conditions

This Cash Transfers of Value Report and the related analysis has been prepared at the direction of the Special Committee and Counsel. THIS CASH TRANSFERS OF VALUE REPORT IS NOT INTENDED TO BE RELIED UPON BY ANY PARTY OTHER THAN PURDUE, PPI, RHODES, THE SPECIAL COMMITTEE OR COUNSEL, OR INDUCE ACTION BY ANY PARTY.

The information contained herein is based upon financial and other data provided to AlixPartners by Counsel, the management and staff of Purdue, PPI, Rhodes, TXP and One Stamford Realty, and publicly available information, which was available and reviewed as of the date of this Cash Transfers of Value Report. The depth of the analyses may be limited in some respects due to the extent and sufficiency of available information. AlixPartners further relied on the assurance of Counsel and management and staff of Purdue, PPI, Rhodes, TXP and One Stamford Realty that they were unaware of any facts that would make the information provided to AlixPartners incomplete or misleading. In preparing this Cash Transfers of Value Report, AlixPartners has assumed, without any independent verification, the accuracy and completeness of all information available from public sources, Counsel, Purdue, PPI, Rhodes, TXP and One Stamford Realty or which was otherwise provided to us.

AlixPartners has not subjected the information contained herein to an examination in accordance with generally accepted auditing or attestation standards. Had AlixPartners performed such an examination, certain matters might have come to our attention that may have caused us to report different findings and observations herein. Accordingly, AlixPartners cannot and does not express an opinion on the information and does not assume any responsibility for the accuracy or correctness of the underlying financial or other data, information and assessments upon which this Cash Transfers of Value Report is based. The analysis performed was on a "level-of-effort" basis; that is, the depth of our analyses and extent of our authentication of the information may be limited in some respects due to the extent and sufficiency of available information, time constraints dictated by the circumstances, and other factors. Additionally, AlixPartners is not licensed to provide legal advice. Accordingly, nothing in this Cash Transfers of Value Report should be construed as legal advice or opinion.

Many of the observations included in this Cash Transfers of Value Report are based upon representations, both written and verbal, made by Counsel and employees of Purdue, PPI, Rhodes, TXP and One Stamford Realty. We give no assurances as to the accuracy of these representations and are not responsible whatsoever for misrepresentations made, if any. Information in this Cash Transfers of Value Report is non-public and considered highly confidential by Counsel and Purdue. Amounts included throughout this Cash Transfers of Value Report represent approximates and may include rounding differences.

This Cash Transfers of Value Report is incomplete without AlixPartners's accompanying verbal presentation and is based on the information and documents reviewed as of the date of this Cash Transfers of Value Report, and review of any additional documents may change the information included herein. The information in this Cash Transfers of Value Report reflects conditions and the views of AlixPartners as of this date, all of which are subject to change. AlixPartners undertakes no obligation to update or provide any revisions to this Cash Transfers of Value Report to reflect events, circumstances or changes that occur after the date this Cash Transfers of Value Report was prepared. Neither this Cash Transfers of Value Report nor any of its contents may be copied, reproduced, disseminated, quoted or referred to in any presentation, agreement or document with or without attribution to AlixPartners.

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WHEN IT REALLY MATTERS.

### Exhibit B

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December 18, 2020

The Honorable Carolyn B. Maloney Chairwoman House of Representatives Committee on Oversight and Reform 2157 Rayburn House Office Building Washington, DC 20515

Dear Chairwoman Maloney:

I represent David Sackler, who testified before the Committee on December 17, 2020 (the "Hearing"). In accordance with the Committee's practice, as reflected in the Committee's press release of March 13, 2019, issued by your predecessor, Chairman Elijah E. Cummings (<a href="https://oversight.house.gov/news/press-releases/cummings-responds-to-letter-from-cohen-s-attorney-clarifying-pardon-testimony">https://oversight.house.gov/news/press-releases/cummings-responds-to-letter-from-cohen-s-attorney-clarifying-pardon-testimony</a>), Mr. Sackler wishes to clarify one answer he gave at the Hearing. At page 23 of the Hearing transcript, you asked Mr. Sackler: "How much of your family's wealth is currently in foreign bank accounts?" Mr. Sackler answered: "Of our family's wealth? I don't believe—very small amount if any." Please note that Mr. Sackler's reference to "our family" was to the Raymond Sackler family.

Respectfully submitted,

Cragn Page

Gregory P. Joseph

cc: The Honorable James R. Comer, Ranking Member