

Approved:

Jason A. Masimore

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Jason A. Masimore
Russell Capone
Edward B. Diskant
Assistant United States Attorneys

Before: HONORABLE RONALD L. ELLIS
United States Magistrate Judge
Southern District of New York

-----x	: <u>SEALED</u>
	: <u>COMPLAINT</u>
UNITED STATES OF AMERICA	: Violation of
- v. -	: 18 U.S.C. §§ 371, 2
STEPHEN COX,	: 21 U.S.C. §§ 331(t),
	: 333(a)(2)
Defendant.	: COUNTY OF OFFENSE
	: NEW YORK
-----x	

STATE OF NEW YORK) ss:
SOUTHERN DISTRICT OF NEW YORK)

DAVID LEE, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE

(Conspiracy to Defraud the United States and to Commit False Pedigree and Misbranding Offenses)

1. From at least in or about 2009, up to and including on or about July 17, 2012, in the Southern District of New York and elsewhere, STEPHEN COX, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to defraud the United States and an agency thereof, and to commit offenses against the United States, to wit, to violate Sections 331(a), 331(c), 331(t) and 333(a)(2) of Title 21, United States Code.

Objects of the Conspiracy

2. It was a part and an object of the conspiracy that STEPHEN COX, the defendant, and others known and unknown,

willfully and knowingly would and did hamper, hinder, impede, and obstruct by trickery, deceit, and dishonest means, the lawful and legitimate functions of the United States Department of Health and Human Services and its agency, the United States Food and Drug Administration ("F.D.A."), in the administration and enforcement of regulations governing prescription drugs, by falsifying prescription drug pedigrees required to be maintained by Title 21, Code of Federal Regulations, Section 203.50(a), for the purpose of concealing the true source of prescription drugs that the defendant and others known and unknown were selling to pharmacies.

3. It was further a part and an object of the conspiracy that STEPHEN COX, the defendant, and others known and unknown, willfully and knowingly, and with the intent to defraud and mislead, would and did fail to comply with the requirements of Section 353(e) of Title 21, United States Code, to wit, while engaged in the wholesale distribution of prescription drugs subject to Title 21, United States Code Section 353(b), not as the manufacturer or authorized distributor of such drugs; COX and others caused falsified statements to be made identifying each prior sale, purchase, and trade of prescription drugs that were required to be provided by Section 353(e)(1)(A) of Title 21, United States Code, and Section 203.50(a) of Title 21, Code of Federal Regulations, in violation of Title 21, United States Code, Sections 331(t) and 333(a)(2).

4. It was further a part and an object of the conspiracy that STEPHEN COX, the defendant, and others known and unknown, willfully and knowingly, and with the intent to defraud and mislead, would and did introduce and deliver for introduction into interstate commerce a drug that was misbranded, as that term is defined in Title 21, United States Code, Sections 352(a) and (i), in violation of Title 21, United States Code, Sections 331(a) and 333(a)(2).

5. It was further a part and an object of the conspiracy that STEPHEN COX, the defendant, and others known and unknown, willfully and knowingly, and with the intent to defraud and mislead, would and did receive in interstate commerce a drug that was misbranded, as that term is defined in Title 21, United States Code, Sections 352(a) and (i), and would and did deliver and proffer delivery thereof for pay and otherwise, in violation of Title 21, United States Code, Sections 331(c) and 333(a)(2).

Overt Acts

6. In furtherance of the conspiracy and to effect the illegal objects thereof, STEPHEN COX, the defendant, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York, and elsewhere:

a. On or about October 17, 2011, a co-conspirator not named herein ("CC-1") signed a pedigree required by Title 21, Code of Federal Regulations, Section 203.50(a), on behalf of a prescription drug wholesale corporation not identified herein ("Drug Wholesaler-1"), which CC-1 owned and controlled, that listed a false history of transactions involving particular prescription drugs that Drug Wholesaler-1 sold to a pharmacy located in New York, New York.

b. In or about 2011, COX received by fax lists of prescription drugs available from unlicensed sources.

(Title 18, United States Code, Section 371.)

COUNT TWO

7. In or about 2011, STEPHEN COX, the defendant, willfully and knowingly, and with the intent to defraud and mislead, failed to comply with the requirements of Section 353(e) of Title 21, United States Code, to wit, while engaged in the wholesale distribution of prescription drugs subject to Title 21, United States Code Section 353(b), not as the manufacturer or authorized distributor of such drugs, COX and others known and unknown caused falsified statements to be generated with respect to prescription drugs shipped by Drug Wholesaler-1 to a pharmacy located in New York, New York ("Pharmacy-1") identifying each prior sale, purchase, and trade of prescription drugs that were required to be provided by Section 353(e)(1)(A) of Title 21, United States Code, and Section 203.50(a) of Title 21, Code of Federal Regulations.

(Title 21, United States Code, Sections 331(t) and 333(a)(2);
Title 18, United States Code, Section 2.)

COUNT THREE

8. In or about 2011, STEPHEN COX, the defendant, willfully and knowingly, and with the intent to defraud and mislead, failed to comply with the requirements of Section 353(e) of Title 21, United States Code, to wit, while engaged in

the wholesale distribution of prescription drugs subject to Title 21, United States Code Section 353(b), not as the manufacturer or authorized distributor of such drugs, COX and others known and unknown caused falsified statements to be generated with respect to prescription drugs shipped by Drug Wholesaler-1 to a pharmacy located in New York, New York ("Pharmacy-2") identifying each prior sale, purchase, and trade of prescription drugs that were required to be provided by Section 353(e)(1)(A) of Title 21, United States Code, and Section 203.50(a) of Title 21, Code of Federal Regulations.

(Title 21, United States Code, Sections 331(t) and 333(a)(2); Title 18, United States Code, Section 2.)

COUNT FOUR

9. In or about 2011, STEPHEN COX, the defendant, willfully and knowingly, and with the intent to defraud and mislead, failed to comply with the requirements of Section 353(e) of Title 21, United States Code, to wit, while engaged in the wholesale distribution of prescription drugs subject to Title 21, United States Code Section 353(b), not as the manufacturer or authorized distributor of such drugs, COX and others known and unknown caused falsified statements to be generated with respect to prescription drugs shipped by Drug Wholesaler-1 to a pharmacy located in the Bronx, New York ("Pharmacy-3") identifying each prior sale, purchase, and trade of prescription drugs that were required to be provided by Section 353(e)(1)(A) of Title 21, United States Code, and Section 203.50(a) of Title 21, Code of Federal Regulations.

(Title 21, United States Code, Sections 331(t) and 333(a)(2); Title 18, United States Code, Section 2.)

COUNT FIVE

10. In or about 2011, STEPHEN COX, the defendant, willfully and knowingly, and with the intent to defraud and mislead, failed to comply with the requirements of Section 353(e) of Title 21, United States Code, to wit, while engaged in the wholesale distribution of prescription drugs subject to Title 21, United States Code Section 353(b), not as the manufacturer or authorized distributor of such drugs, COX and others known and unknown caused falsified statements to be generated with respect to prescription drugs shipped by Drug Wholesaler-1 to a pharmacy located in the Bronx, New York ("Pharmacy-4") identifying each prior sale, purchase, and trade

of prescription drugs that were required to be provided by Section 353(e)(1)(A) of Title 21, United States Code, and Section 203.50(a) of Title 21, Code of Federal Regulations.

(Title 21, United States Code, Sections 331(t) and 333(a)(2); Title 18, United States Code, Section 2.)

COUNT SIX

11. In or about 2011, STEPHEN COX, the defendant, willfully and knowingly, and with the intent to defraud and mislead, failed to comply with the requirements of Section 353(e) of Title 21, United States Code, to wit, while engaged in the wholesale distribution of prescription drugs subject to Title 21, United States Code Section 353(b), not as the manufacturer or authorized distributor of such drugs, COX and others known and unknown caused falsified statements to be generated with respect to prescription drugs shipped by Drug Wholesaler-1 to a pharmacy located in the Bronx, New York ("Pharmacy-5") identifying each prior sale, purchase, and trade of prescription drugs that were required to be provided by Section 353(e)(1)(A) of Title 21, United States Code, and Section 203.50(a) of Title 21, Code of Federal Regulations.

(Title 21, United States Code, Sections 331(t) and 333(a)(2); Title 18, United States Code, Section 2.)

COUNT SEVEN

12. In or about 2011, STEPHEN COX, the defendant, willfully and knowingly, and with the intent to defraud and mislead, failed to comply with the requirements of Section 353(e) of Title 21, United States Code, to wit, while engaged in the wholesale distribution of prescription drugs subject to Title 21, United States Code Section 353(b), not as the manufacturer or authorized distributor of such drugs, COX and others known and unknown caused falsified statements to be generated with respect to prescription drugs shipped by Drug Wholesaler-1 to a pharmacy located in the Bronx, New York ("Pharmacy-6") identifying each prior sale, purchase, and trade of prescription drugs that were required to be provided by Section 353(e)(1)(A) of Title 21, United States Code, and Section 203.50(a) of Title 21, Code of Federal Regulations.

(Title 21, United States Code, Sections 331(t) and 333(a)(2); Title 18, United States Code, Section 2.)

The bases for my knowledge of the foregoing charges are, in part, as follows:

13. I am a Special Agent with the Federal Bureau of Investigation, and have been so since 2010. I am presently assigned to Squad C-33, which is within the FBI's Health Care Fraud Task Force ("HCFTF"). As a Special Agent in the HCFTF, I have conducted numerous investigations into federal crimes relating to mail fraud, wire fraud, health care fraud, prescription drug diversion, unlawful drug trafficking and money laundering, among other things. During that time, I have, among other things, conducted or participated in surveillance, the execution of search warrants, debriefings of informants, confidential sources, and cooperating witnesses, reviews of recorded conversations and drug records, and the interception of wire and electronic communications.

14. I have been personally involved in the investigation of this matter. This affidavit is based on my personal observations and participation during the investigation, my conversations with other law enforcement officers and agents, my interviews of witnesses, my execution of search warrants and seizure of evidence, and my examination of evidence, documents, reports and other records. Because this affidavit is submitted for the limited purpose of establishing probable cause, it does not include all facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Relevant Entities and Individuals

15. At all times relevant to the Complaint, Drug Wholesaler-1 was a pharmaceutical wholesale distribution corporation with its principal place of business in St. George, Utah. Drug Wholesaler-1 distributed prescription drugs to pharmacies all over the country, including to pharmacies in Manhattan and the Bronx.

16. At various times relevant to the Complaint, K All Sports Meds LLC ("K-All") was a pharmaceutical distribution company listing its principal place of business in Picayune, Mississippi. I know from bank records that during the relevant time period, Drug Wholesaler-1 paid K-All at least \$4.8 million for prescription drugs, all of which came from unlicensed sources.

17. At various times relevant to the Complaint, Acacia Pharma Distributors, Inc. ("Acacia") was a pharmaceutical distribution company listing its principal place of business in D'Iberville, Mississippi. I know from bank records that during the relevant time period, Drug Wholesaler-1 paid Acacia at least \$16.1 million for prescription drugs, all of which came from unlicensed sources.

18. At various times relevant to the Complaint, KPP Consulting, Inc. ("KPP") was a pharmaceutical distribution company incorporated in Texas and listing its principal place of business in Biloxi, Mississippi. I know from bank records that during the relevant time period, Drug Wholesaler-1 paid KPP at least \$24.3 million for prescription drugs, all of which came from unlicensed sources.

19. At various times relevant to the Complaint, Four Corner Suppliers, Inc. ("Four Corner") was a pharmaceutical distribution company listing its principal place of business in Gulfport, Mississippi. I know from bank records that during the relevant time period, Drug Wholesaler-1 paid Four Corner at least \$1 million for prescription drugs, all of which came from unlicensed sources.

20. At various times relevant to the Complaint, Rymar Distributors, Inc. ("Rymar") was a pharmaceutical distribution company incorporated in Texas and listing its principal place of business in Ridgeland, Mississippi. I know from bank records that during the relevant time period, Drug Wholesaler-1 paid Rymar at least \$3 million for prescription drugs, all of which came from unlicensed sources.

21. At all times relevant to the Complaint, CC-1 was the owner and principal of Drug Wholesaler-1. CC-1 signed pedigrees for prescription drugs sold to pharmacies all over the country setting forth false transaction histories for those prescription drugs. CC-1 also instructed co-conspirators how to construct false pedigrees so that they would look believable if those pedigrees were subjected to scrutiny. Drug Wholesaler-1 collected these false pedigrees from its sources of supply and maintained them in its records. CC-1 signed pedigrees for Drug Wholesaler-1 that mirrored this false information concerning the source of the prescription drugs Drug Wholesaler-1 sold to its customers all over the country, including in Manhattan and the Bronx.

22. From at least in or about 2009 through on or about November 4, 2011, STEPHEN COX, the defendant, worked for CC-1 at

Drug Wholesaler-1 in Utah as its warehouse manager. At Drug Wholesaler-1, COX received by fax from co-conspirators lists of prescription drugs available from unlicensed sources. COX communicated with co-conspirators concerning orders and shipments of prescription drugs from unlicensed sources and passed along instructions to co-conspirators concerning how to construct false pedigrees so that they would look believable if those pedigrees were subjected to scrutiny. At Drug Wholesaler-1, COX received and inspected shipments of prescription drugs from unlicensed sources. From in or about 2011 through on or about July 17, 2012, COX worked with KPP and Rymar in Texas. At KPP and Rymar, COX continued to receive lists of prescription drugs available from unlicensed sources and coordinate shipments to Drug Wholesaler-1. COX also received and inspected the prescription drugs from unlicensed sources before they were shipped to Drug Wholesaler-1.

23. During the course of this investigation, a co-conspirator not named as a defendant herein ("CW-1") has pleaded guilty to various charges, including to the conspiracy charged herein, and has provided information to the Government in the hope of receiving leniency at sentencing. Information provided by CW-1 has been corroborated by independent information, including by documents obtained by search warrant and subpoena and information provided by other cooperating witnesses. Accordingly, I believe CW-1 is a reliable source of information concerning the events described herein. At all times relevant to the Complaint, CW-1 obtained prescription drugs from unlicensed sources and sold those drugs to Drug Wholesaler-1 through the intermediary companies K-All, Acacia, KPP, Four Corner and Rymar. CW-1 controlled the operations of these intermediary companies, though CW-1 was not their owner of record or signatory on their bank accounts.

24. During the course of this investigation, another co-conspirator not named as a defendant herein ("CW-2") has pleaded guilty to various charges, including to the conspiracy charged herein, and has provided information to the Government in the hope of receiving leniency at sentencing. Information provided by CW-2 has been corroborated by independent information, including by documents obtained by search warrant and subpoena and information provided by other cooperating witnesses. Accordingly, I believe CW-2 is a reliable source of information concerning the events described herein. At various times relevant to the Complaint, CW-2, along with another co-conspirator not named as a defendant herein ("CC-2"), worked with CW-1 to sell drugs from unlicensed sources to Drug

Wholesaler-1. CC-2 was the president of KPP. CW-2 was the president of Rymar.

False Pedigree Scheme

25. I know the following, in substance and in part, from debriefings of CW-1 in which I personally participated and reviewing documents seized from CW-1's house pursuant to a search warrant in July 2012:

a. CW-1 worked as a pharmaceutical sales representative for approximately 22 years. From in or about December 1986 through September 1990, CW-1 worked at Quad Pharmaceuticals ("Quad") as a hospital sales representative.

b. While working for Quad, CW-1 met the father of STEPHEN COX, the defendant ("COX's Father").¹ COX's Father subsequently opened Altec Medical Inc. ("Altec"), a licensed prescription drug wholesaler based in South Carolina.² CW-1 learned from COX's Father that Altec's biggest customers were MOM's Pharmacy ("MOM's")³ and Drug Wholesaler-1. CW-1 learned how to procure prescription drugs from unlicensed sources, in part, from COX's Father.

¹ I know from a Quad newsletter dated November 1989, which was seized during the execution a search warrant at CW-1's house, that CW-1 and COX's Father were both listed as being in Quad's top 20 sales representatives.

² I know from court records that on or about August 10, 2012, Altec pleaded guilty in the United States District Court for the Southern District of Florida to conspiring to defraud the FDA and commit federal offenses in connection with a drug diversion scheme, which lasted from in or about 2007 through in or about 2009, and agreed to pay a \$2 million fine and forfeit \$1 million. The Court also ordered Altec to serve one year of probation. The Information to which Altec pleaded guilty alleged, among other things, that Altec and others had falsified drug pedigrees to make it appear as though drugs had originally been acquired lawfully, but in fact, and as Altec knew, had been acquired from illegitimate sources.

³ MOM's Pharmacy was a high-volume pharmacy with offices in Suffolk County and Brooklyn, among other places. I know from court records and press reports that, on April 4, 2012, the New York State Attorney General indicted four individuals in connection with a scheme to distribute approximately \$275 million worth of black market prescription HIV drugs through MOM's.

c. CW-1 developed illegitimate, unlicensed sources of prescription drugs. Those sources obtained prescription drugs through illegitimate channels, including through networks of individuals who purchased prescription drugs from Medicaid patients in New York City to whom they had been prescribed and dispensed, which the sources sold to CW-1 at a deep discount off of legitimate wholesale prices. CW-1 knew that some of the drugs coming from CW-1's sources previously had been dispensed to patients in manufacturer bottles with patient labels affixed, but had been cleaned up to remove the patient labels so as to appear as if they were new from the manufacturer and had not previously been dispensed. On at least one occasion, after CW-1 had sold some of these prescription drugs to Altec, COX's Father contacted CW-1 and told CW-1 that there had been a patient label on one of the bottles and that CW-1 needed to do a better job inspecting the bottles before shipping them.

d. In order to sell these black market prescription drugs to Altec, and later to Drug Wholesaler-1, CW-1 used intermediary companies, which were licensed to engage in the wholesale distribution of prescription drugs. CW-1 controlled these intermediary companies, but they were listed in other individuals' names. From in or about 2006 through 2012, CW-1 used K-All, Acacia, Four Corner, KPP and Rymar as intermediary companies to sell black market prescription drugs to Altec and/or Drug Wholesaler-1.

e. CW-1's unlicensed sources shipped them by commercial carrier from other states, including Florida and New Jersey, to CW-1 and CW-1's co-conspirators. In turn, CW-1 and CW-1's co-conspirators shipped them to Altec and Drug Wholesaler-1. CW-1's intermediary companies received payments from Altec and Drug Wholesaler-1, and CW-1 received commission payments through other bank accounts for companies held in his own name. After receiving payments from Altec and/or Drug Wholesaler-1, CW-1's intermediary companies sent money by wire transfer and other methods to foreign bank accounts as instructed by CW-1's illegitimate sources to pay for the prescription drugs. CW-1 split the profits of the intermediary companies with his co-conspirators.

f. While doing business with Altec, CW-1 learned from COX's Father that CW-1 had to generate false pedigrees that purported to trace all previous transactions involving the prescription drugs CW-1 was selling to Altec back to an authorized distributor. CW-1 and CW-1's co-conspirators generated these false pedigrees and sent them to Altec as requested. Through CW-1's conversations with COX's Father, CW-1

understood that Altec's customers needed paper trails in case of an audit by the FDA, but those customers did not intend to verify the pedigrees by contacting any of the entities falsely listed on the pedigrees as having been a part of CW-1's supply chain.

g. When CW-1 first began selling black market prescription drugs to Altec, COX's Father instructed CW-1 to ship them to Altec, and Altec paid CW-1's intermediary companies. On a few occasions in or about 2009, COX's Father instructed CW-1 to ship the drugs directly to Drug Wholesaler-1, but Altec still paid for the drugs, rather than Drug Wholesaler-1.

h. In or about late 2009 or early 2010, COX's Father informed CW-1 that he was sending his son, STEPHEN COX, the defendant, to work at Drug Wholesaler-1, and that CW-1 would be selling prescription drugs directly to Drug Wholesaler-1 through STEPHEN COX. CW-1 learned from COX's Father that COX was experiencing personal problems, including a substance abuse problem, and COX's Father wanted to send him away to Utah so COX could straighten out those problems while he worked for Drug Wholesaler-1. CW-1 then began dealing with COX at Drug Wholesaler-1.

i. When CW-1 first began dealing with COX at Drug Wholesaler-1, CW-1 suggested that they use a secure telephone line to speak about their illegitimate transactions. COX said that he already had a dedicated cellphone that he used with other sources of supply and provided that number to CW-1. CW-1 obtained prepaid phones that CW-1 used for this purpose as well. From that point on, at various times when CW-1 and COX needed to talk on the secure line, they would use certain phrases to indicate to each other that they needed to have a discussion over a secure line rather than their regular cellphones.

j. COX told CW-1 that COX's Father and CC-1 were friends and had a long-standing business relationship in the prescription drug business.⁴ On the telephone, COX referred to

⁴ In July 2012, during the execution of a search warrant at Drug Wholesaler-1's office in Utah, law enforcement officers found an Altec business card in CC-1's name. It was attached to a document containing contact information for CC-1 from the summer of 2009. CC-1's card listed Altec's South Carolina address, but CC-1's contact numbers contained an area code assigned to the area in Nevada where CC-1 resides. Moreover, I know from an interview conducted by another FBI agent of a

CC-1 by an alias even though both COX and CW-1 knew CC-1's true name. CW-1 understood that by doing so COX was engaging in precautionary measures designed to evade detection.

k. COX instructed CW-1 how CC-1 wanted the pedigrees to be generated so they appeared more believable if they came under scrutiny. For example, COX told CW-1 that the transaction history reflected on a pedigree could contain no more than two licensed wholesalers after the authorized distributor. COX also told CW-1 that the authorized distributor listed as the source of the prescription drugs had to be located near the licensed wholesaler that purportedly purchased the drugs from the authorized distributor. COX also told CW-1 to make sure that the transaction dates on the pedigrees were realistic. For example, on some occasions, the pedigree that CW-1 and CW-1's co-conspirators fabricated inverted the dates of transactions, showing drugs to have been sold to the next entity on a date before the drugs were purchased. On those occasions, COX contacted CW-1 and instructed CW-1 to submit corrected pedigrees.

l. When CW-1's companies began selling to Drug Wholesaler-1 through COX as the contact person, the transactions operated as follows: CW-1 received faxes of lists of available drugs from CW-1's sources of supply. Sometimes these were handwritten lists. CW-1 would write the initials or names CW-1 used to keep track of the suppliers, like "A/V," referring to Abel Gonzalez, "Coco," referring to Conrado Vazquez, and "Judio," referring to Israel Tacher, on the lists and fax them as-is to Drug Wholesaler-1.⁵

m. After receiving the faxed lists, COX would then call CW-1 with the amounts CC-1 wanted to buy. CW-1's co-conspirators would receive the shipments from the sources and immediately ship them to Drug Wholesaler-1. After Drug Wholesaler-1 received them, COX would inspect the bottles and

manager of a MOM's Pharmacy located in California ("Manager-1") that from in or about July 2009 through in or about October 2009, CC-1 sent Manager-1 purchase orders for prescription drugs from Altec at a discount of 7% off of the wholesale acquisition cost or ("WAC") for the drugs, which I know from my training and experience refers to the manufacturer's list price of a drug when it is sold to a wholesaler.

⁵ Gonzalez, Vazquez and Tacher have all pleaded guilty in *United States v. Viera, et al.*, 11 Cr. 1072 (DLC), in the Southern District of New York, to various offenses relating to their involvement in selling diverted drugs to CW-1.

then call CW-1's co-conspirators and give them a purchase order serial number from Drug Wholesaler-1 to put on the pedigree for that shipment. Drug Wholesaler-1 then sent CW-1's companies purchase orders for the drugs Drug Wholesaler-1 had already received. After that, CW-1's companies sent Drug Wholesaler-1 invoices and pedigrees.

n. At the beginning, Drug Wholesaler-1 paid CW-1's intermediary companies by wire transfer and also sent separate commission payments to CW-1 in the names of various other companies held directly by CW-1. In or about August 2010, CW-1 was charged by authorities in Florida with various criminal offenses related to prescription drug diversion and money laundering that occurred from in or about September 2006 through in or about 2008. After that, COX contacted CW-1 and told CW-1 that CC-1 no longer wanted payments to be traceable from Drug Wholesaler-1 to CW-1. From that point on, Drug Wholesaler-1 solely paid CW-1's intermediary companies, and CW-1 obtained profits and commissions from those companies, rather than directly from Drug Wholesaler-1.

o. At some point after CW-1's arrest in Florida, and while COX still worked at Drug Wholesaler-1, CW-1 traveled to Las Vegas, Nevada, which is not far from Drug Wholesaler-1's Utah office, and met with COX. CW-1 told COX that CW-1 wanted to meet CC-1 personally. COX told CW-1, in substance, that CC-1 did not want to meet CW-1 in person because CC-1 knew that CW-1 had been arrested in Florida. CW-1 has never met CC-1.

p. The supplier lists that CW-1 and CW-1's co-conspirators sent to Drug Wholesaler-1 were never printed on letterhead or otherwise contained information reflecting that they were offer sheets from CW-1's companies. In addition, COX knew the nicknames of CW-1's actual suppliers, and they discussed the sources on the telephone when COX and CW-1 discussed various shipments and orders.

q. In or about late 2011, CC-1 called CW-1 and told CW-1 that CC-1 no longer wanted COX to work at Drug Wholesaler-1 in Utah because COX had continued substance abuse problems. This was the first direct conversation that CW-1 had with CC-1. CC-1 suggested that COX move to Texas or Mississippi and inspect bottles from CW-1's sources there prior to their shipment to Drug Wholesaler-1. CC-1 said that he would pay CW-1 more for the prescription drugs in an amount equal to the commission that had been COX's payment while he worked at Drug Wholesaler-1. From that point on, COX would receive payment from CW-1 out of the additional amount Drug Wholesaler-1 would be paying.

r. In late 2011, COX stopped working at Drug Wholesaler-1 in Utah and eventually came to Texas to work directly with CW-1 and the co-conspirators. Immediately after COX stopped working at Drug Wholesaler-1 and was in the process of moving to Texas to work with CW-1 and CW-1's co-conspirators, CC-1, himself, directly conducted Drug Wholesaler-1's business with CW-1 and his co-conspirators.

s. During that time period, CW-1 and CC-1 spoke regularly by telephone regarding the prescription drugs Drug Wholesaler-1 was purchasing. CC-1 would indicate which drugs CC-1 wanted or did not want. The manner by which CW-1 communicated the amounts and types of prescription drugs available from CW-1's illegitimate suppliers did not change; CW-1 and his co-conspirators faxed the same lists to Drug Wholesaler-1 that they had received from their unlicensed suppliers. These lists had the same appearance as before, sometimes handwritten and never indicating by letterhead or otherwise that they were from one of CW-1's companies. Other times, CW-1 verbally communicated what was available by telephone to CC-1. After these lists were sent to Drug Wholesaler-1 or otherwise communicated to CC-1, CC-1 would tell CW-1 what CC-1 wanted.

t. CW-1 understood that CC-1 needed to know what was coming from CW-1's suppliers because CC-1 would pre-sell it to Drug Wholesaler-1's customers before Drug Wholesaler-1 received it. COX told CW-1, in substance, that CC-1 did not want Drug Wholesaler-1 to store prescription drugs obtained from CW-1 because CC-1 did not want regulatory inspectors to find the prescription drugs, and the longer that prescription drugs sat on the shelf at Drug Wholesaler-1, the higher the probability that an inspector would see the drugs sitting on the shelves and ask questions about the source of those drugs.

u. Once COX arrived and became settled in Texas, COX worked for KPP and Rymar and acted as the contact between CC-1 and CW-1 and CW-1's co-conspirators. COX and CW-1's co-conspirators also inspected the bottles received from CW-1's illegitimate sources in Texas before shipping them to Drug Wholesaler-1 in Utah.

v. I know from law enforcement reports that, on December 1, 2011, FBI agents, in response to communications intercepted pursuant to a wiretap order, conducted surveillance of two of CW-1's co-conspirators, Israel Tacher, a/k/a "Judio," and Roberto Tacher (a father and son) at a motel in New Jersey, where they went to pick up prescription drugs they were selling

to CW-1.⁶ Agents observed the Tachers packing boxes into a vehicle, which they drove to a nearby UPS store in North Bergen, New Jersey. Pursuant to a warrant, agents seized the boxes, which were addressed to the home address of CW-2. Inside the boxes, agents discovered approximately 301 bottles of the HIV medication Kaletra, worth more than approximately \$212,000 in Medicaid reimbursement value. The agents replaced the drugs with candy that rattled like pills and other items and caused the boxes to be delivered to CW-2's house, where they conducted surveillance of CW-2 fleeing CW-2's house after discovering the candy.

w. In or about December 2011, CW-1 was in Miami, Florida. COX was in Miami at the same time. CW-1 learned from CW-2 that CW-2 had received boxes of candy and believed CW-2 was being followed by law enforcement. CW-1 met with COX and told COX it could be a problem for them. CW-1 then called Israel Tacher, a/k/a "Judio," about the problem and COX told CW-1 to tell Israel Tacher to come to COX's hotel room. Israel Tacher, a/k/a "Judio," and Roberto Tacher then came to COX's hotel room, where they met with CW-1 and COX about the situation. At that meeting, Roberto Tacher stated, in substance, that he had packed the boxes himself and put them in the mail himself and he did not know what happened. CW-1 told them that CW-2 had been followed. At the conclusion of the meeting, Israel Tacher and CW-1 agreed that they would split the cost of the lost shipment of drugs.

x. In or about 2012, COX called CW-1 and told CW-1, in substance, that there was a "big problem" with MOM's Pharmacy, that people had been charged with crimes, and that MOM's was Drug Wholesaler-1's largest customer for the HIV drugs that CW-1 had been selling to Drug Wholesaler-1.⁷ COX said that

⁶ Roberto Tacher pleaded guilty in *United States v. Viera, et al.*, 11 Cr. 1072 (DLC), in the Southern District of New York, to charges relating to his involvement in selling diverted prescription drugs to CW-1.

⁷ I know from my involvement in the investigation, that, on or about February 2, 2012, the New York Attorney General executed a search warrant at an office of MOM's Pharmacy in Long Island and arrested four people. As noted above, I know from court documents and press reports that, on April 4, 2012, the New York State Attorney General indicted those four people in connection with a scheme to distribute approximately \$275

because of this, CC-1 was no longer buying HIV medications. COX said that CC-1 would continue to buy "dry goods," meaning non-HIV prescription medications, like, for example, Singulair. CW-1 asked COX whether CC-1 was going to shut down. COX replied, in substance, that CC-1 could not because CC-1 carried a lot of financial obligations.

y. Sometime after this conversation, COX called CW-1 and told CW-1 that CC-1 would begin purchasing HIV medications again. CW-1 continued to sell HIV and other prescription drugs from CW-1's illegitimate sources to Drug Wholesaler-1 until CW-1 was arrested in July 2012.

z. K-All, Four Corner, Acacia, KPP and Rymar never purchased prescription drugs directly from an authorized distributor. All of the drugs CW-1 and the others sold through these companies to Drug Wholesaler-1 came from illegitimate, unlicensed sources, and some of these drugs previously had been dispensed to patients.

26. I know the following, in substance and in part, from debriefings of CW-2 in which I personally participated:

a. In or about 2011, CW-2 began assisting CC-2 in working with CW-1 to buy and sell prescription drugs from illegitimate sources.

b. CW-2 first heard of STEPHEN COX, the defendant, in or about July 2011. COX would call CW-2 four to five times a week to talk about prescription drugs coming from CW-1's sources. COX was paranoid on the telephone in how he communicated. COX referred to CC-1 by an alias. COX also switched telephone numbers several times while CW-2 worked with COX.

c. CW-1's sources would fax CW-1 and CW-2 lists of available prescription drugs. CW-2 faxed them to COX, who communicated them to CC-1. CW-2 understood from COX that CC-1 wanted the lists so he could pre-sell the drugs because CC-1 did not want the drugs on the shelf at Drug Wholesaler-1 if an inspector were to perform an audit of Drug Wholesaler-1.

million worth of black market prescription HIV drugs through MOM's pharmacy.

d. CW-2 would receive boxes from CW-1's sources, which CW-2 and others shipped to Drug Wholesaler-1. After Drug Wholesaler-1 received the boxes, COX or CC-1 would call CW-2 to provide a purchase order serial number from Drug Wholesaler-1 for CW-2 to include on the pedigrees, which CW-2 authored and sent to Drug Wholesaler-1. Then Drug Wholesaler-1 would send its purchase order for the drugs that Drug Wholesaler-1 had already received to CW-2. CW-2 then generated a KPP or Ryamar invoice and sent it to Drug Wholesaler-1. Drug Wholesaler-1 then paid KPP or Ryamar.

e. As part of CW-2's duties, CW-2 generated false pedigrees reflecting fictitious transactions to make it look like the prescription drugs CW-1 and the others were selling to Drug Wholesaler-1 came from legitimate sources. COX directly instructed CW-2 how to falsify pedigrees so that they would be more believable if subjected to scrutiny. For example, on several occasions, COX called CW-2 to have CW-2 change the date of the transactions CW-2 had listed on a pedigree. CW-2 recalls that on at least one occasion, CW-2 had accidentally picked a transaction date that fell on a Sunday. COX instructed CW-2 to change this date, because shipments are not sent or received on Sundays. On other occasions, COX told CW-2 to pick earlier dates for transactions because the dates CW-2 originally picked and wrote on a pedigree would not have given enough time for the transactions to have been processed if they were occurring for real.

f. On at least one occasion, CW-2 and COX discussed pedigrees at CW-2's house. COX and CW-2 were discussing the fact that CW-1 was going to have to pay someone in order to use Four Corner as an intermediary licensed wholesaler on their pedigrees. CW-2 asked COX why they needed to include another company on the pedigree when they could just list KPP. COX replied, in substance, that CC-1 wanted to have two licensed wholesalers listed on pedigrees between the purported authorized distributor and Drug Wholesaler-1 to provide CC-1 with more of a buffer.

g. COX came to Texas to work with CW-2 and CC-2 at KPP in or about November 2011. CW-2 understood that COX had a drinking problem and had an argument with CC-1. CW-1 told CW-2 that COX would come work with them and help them inspect the bottles of drugs going to Drug Wholesaler-1.

h. After COX came to Texas, COX, CW-2 and others inspected bottles from CW-1's suppliers before shipping them to Drug Wholesaler-1. On at least one occasion, CW-2 observed COX

take a manufacturer's bottle that had a patient label attached to it and clean the patient label off before sending it to Drug Wholesaler-1. On another occasion while COX was present, they found a bottle that contained something that looked like cod oil supplements, rather than the listed medications, which they discarded. COX made a remark stating, in substance, "that's why they call it medical surprise."

i. On one occasion, CW-2 saw information relating to someone arrested for kidnapping and noticed the term "bodega," which CW-2 did not understand. CW-2 asked COX what "bodega" meant, and COX replied, in substance, that a bodega is a place where people "off the street" can sell their medicines and that it was the kind of place where they were getting some of their prescription drugs.

j. Through conversations with COX, CW-2 learned that COX knew the identities of CW-1's illegitimate sources. For example, COX said he knew a source of CW-1's called "JT."

k. CW-2 also learned that COX had personally met some of CW-1's suppliers. For example, after CW-2 found candy in the boxes from the Tachers that law enforcement had intercepted, as described above, CW-2 called COX, who was in Miami with CW-1. CW-2 kept trying to call CW-1, but CW-1 would not pick up the phone. CW-2 called COX to talk to CW-1. COX later told CW-2 that he had met a father and son in Florida who supplied CW-1, telling CW-2 that the son was a "jerk," which CW-2 understood to mean arrogant and pompous.⁸

l. CW-2 spoke to CC-1 over the telephone on a number of occasions. CC-1 would call CW-2 and give CW-2 a purchase order serial number from Drug Wholesaler-1 for CW-2 to put on the pedigree. In or about May 2012, COX stopped working with KPP and Rymar, and CW-2 began to speak with CC-1 more frequently.

m. After COX left, CW-2 had a conversation with CC-1 during which CC-1 said that he would no longer buy any HIV medications because they were "hot" or had "heat on them." COX had previously told CW-2 that Drug Wholesaler-1 had been selling drugs to MOM's Pharmacy.

⁸ Based on CW-1's and CW-2's descriptions of what happened after the FBI replaced the Tachers' prescription drugs with candy, as described herein, I believe that the father and son COX met in Florida to which COX was referring in his conversation with CW-2 were Israel and Roberto Tacher.

27. CW-2's cellphone, which CW-2 possessed at the time of one of his proffers with the Government, listed a contact telephone number for CC-1.

28. During the execution of a search warrant at CW-1's house in July 2012, agents found several cellular telephones, which CW-1 subsequently told us were prepaid cellphones obtained in other people's names that CW-1 used in connection with buying and selling prescription drugs. In at least two of those telephones, the contact lists reflect telephone numbers assigned to "Stephen," which I know from CW-1 refers to STEPHEN COX, the defendant.

29. I know the following from my review of documents recovered during the execution of the search warrant at Drug Wholesaler-1's office in July 2012:

a. During the search, agents recovered documents from Drug Wholesaler-1's files that were lists from CW-1's illegitimate suppliers that had been faxed by CW-1 and CW-2 and received by STEPHEN COX, the defendant. For example, one list, dated August 11, 2011 in the fax line at the top and attached hereto as Exhibit A, was from a supplier of CW-1 identified on the list with the initial "J." At the bottom COX wrote, "will take everything except Abilify 30 mg," followed his initials. Another list, handwritten and supplied by the supplier of CW-1 identified on the list by the initials "AV," which I know from CW-1 and CW-2 to refer to Abel Gonzalez, and attached hereto as Exhibit B, is marked "ATTN: STEPHEN." A third list, dated July 20, 2011 in the fax line at the top and attached hereto as Exhibit C, was from a supplier of CW-1 identified by the initial "P." This list appears to have been marked up by COX with numbers reflecting what Drug Wholesaler-1 would purchase, and COX apparently wrote, "What we will take," signing it "Stephen."

b. A "List of Personnel" document lists CC-1 as Drug Wholesaler-1's owner, stating that he "worked 18 years in pharmaceutical business," and lists STEPHEN COX as Drug Wholesaler-1's warehouse manager with "8 years in pharmaceutical business."

c. Numerous "Receiving Tickets" reflect the receipt by Drug Wholesaler-1 of a substantial quantity of prescription drugs from Four Corner, K-All, Acacia, KPP and Rymar.

d. A Drug Wholesaler-1 pedigree dated February 12, 2010, reflects the shipment of various HIV drugs to a MOM's Pharmacy location in the state of Washington. CC-1 signed this

pedigree, which certifies that some of the prescription drugs had been purchased from K-All, which purportedly purchased them from Cardinal Health, an authorized distributor.

e. A number of Drug Wholesaler-1 pedigrees from 2011 reflect the shipment of various prescription drugs, including HIV drugs, to a MOM's Pharmacy location in Melville, New York. CC-1 signed these pedigrees, each of which contains a certification as to the prior transaction history of the prescription drugs. Some of the certifications claim that some of the prescription drugs had been purchased from Acacia, which purportedly purchased them from Cardinal Health or from AmerisourceBergen, an authorized distributor. Others claim that some of the prescription drugs had been purchased from KPP, which purportedly purchased them from Acacia, which purportedly purchased them from AmerisourceBergen.

f. A number of Drug Wholesaler-1 pedigrees from 2011 reflect the shipment of various prescription drugs by Drug Wholesaler-1 to a pharmacy located in New York, New York ("Pharmacy-1"). CC-1 signed these pedigrees, each of which contains a certification as to the prior transaction history of the prescription drugs. Some of the certifications claim that some of the prescription drugs had been purchased from K-All, which purportedly purchased them from Cardinal Health, an authorized distributor. Others claim that some of the prescription drugs had been purchased from Acacia, which purportedly purchased them from Cardinal Health. Others claim the prescription drugs had been purchased from KPP, which purportedly purchased them from Acacia, which purportedly purchased them from AmerisourceBergen, an authorized distributor.

g. A number of Drug Wholesaler-1 pedigrees from 2011 reflect the shipment of various drugs to another pharmacy located in New York, New York ("Pharmacy-2"). CC-1 signed these pedigrees, each of which contains a certification as to the prior transaction history of the prescription drugs. Some of the certifications claim that some of the prescription drugs had been purchased from Acacia, which purportedly purchased them from Cardinal Health, an authorized distributor. Others claim that some of the prescription drugs had been purchased from KPP, which purportedly purchased them from Acacia, which purportedly purchased them from AmerisourceBergen, an authorized distributor.

h. A number of Drug Wholesaler-1 pedigrees from 2011 reflect the shipment of various drugs to a pharmacy located in

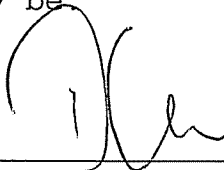
the Bronx, New York ("Pharmacy-3"). CC-1 signed these pedigrees, each of which contains a certification as to the prior transaction history of the prescription drugs. Some of the certifications claim that some of the prescription drugs had been purchased from K-All, which purportedly purchased them from Cardinal Health, an authorized distributor. Others claim that some of the prescription drugs had been purchased from Acacia, which purportedly purchased them from Cardinal Health.

i. A number of Drug Wholesaler-1 pedigrees from 2011 reflect the shipment of various drugs to another pharmacy located in the Bronx, New York ("Pharmacy-4"). CC-1 signed these pedigrees, each of which contains a certification as to the prior transaction history of the prescription drugs. Some of the certifications claim that some of the prescription drugs had been purchased from Acacia, which purportedly purchased them from Cardinal Health, an authorized distributor. Others claim that some of the prescription drugs had been purchased from K-All, which purportedly purchased them from Cardinal Health.

j. A number of Drug Wholesaler-1 pedigrees from 2011 reflect the shipment of various drugs to another pharmacy located in the Bronx, New York ("Pharmacy-5"). CC-1 signed these pedigrees, each of which contains a certification as to the prior transaction history of the prescription drugs. Some of the certifications claim that some of the prescription drugs had been purchased from K-All, which purportedly purchased them from Cardinal Health, an authorized distributor. Others claim that some of the prescription drugs had been purchased from Acacia, which purportedly purchased them from Cardinal Health.

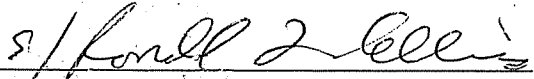
k. A number of Drug Wholesaler-1 pedigrees from 2011 reflect the shipment of various drugs to another pharmacy located in the Bronx, New York ("Pharmacy-6"). CC-1 signed these pedigrees, each of which contains a certification as to the prior transaction history of the prescription drugs. Some of the certifications claim that some of the prescription drugs had been purchased from K-All, which purportedly purchased them from Cardinal Health, an authorized distributor. Others claim that some of the prescription drugs had been purchased from Acacia, which purportedly purchased them from Cardinal Health.

WHEREFORE, deponent asks that a warrant be issued for the arrest of STEPHEN COX, the defendant, and that he be imprisoned or bailed, as the case may be.



DAVID LEE
Special Agent
Federal Bureau of Investigation

Sworn to before me this
15th Day of January, 2014.



HONORABLE RONALD L. ELLIS
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK

EXHIBIT A

	NDC			100%
ABILIFY 10MG/30	59148-0008-13	10	454.07	4540.70
ABILIFY 15MG/30	59148-0009-13	5	454.07	2270.35
ABILIFY 20MG/30	59148-0010-13	46	642.13	29537.98
ABILIFY 2MG/30	59148-0006-13	2	428.37	856.74
ABILIFY 30MG/30	59148-0011-13			
ABILIFY 5MG/30	59148-0007-13	4	428.37	1713.48
ADVAIR 100/50		70	160.89	11262.30
ADVAIR 250/50		151	199.90	30184.90
ADVAIR 500/50		14	262.93	3681.02
ATRIPLA 600/200/300MG	15584-0101-01	26	1527.21	39707.46
COMBIVIR 150MG/300MG	00173-0595-00	3	827.48	2482.44
EMTRIVA 200MG/30	61958-0601-01	1	389.54	389.54
EPIVIR 300MG/30	00173-0714-00	1	389.54	389.54
EPXICON 600MG/30	00173-0742-00	36	894.46	32200.56
INTELENCE 200MG/		2	730.68	1461.36
ISENTRESS 400MG/60	00005-0227-61	4	934.94	3739.76
NEXIUM 40MG/30		706	154.81	109295.86
PREZISTA 400MG/60	59676-0561-01	1	918.50	918.50
REYATAZ 300MG/30	00003-3622-12	8	897.68	7181.44
SEROQUEL 200MG/60 XR		1	586.92	586.92
SEROQUEL 300 MG/60	00310-0274-60	1	586.92	586.92
SEROQUEL XR 300MG/60	00310-0283-60	1	586.92	586.92
SINGULAIR 10 MG		524	121.60	63718.40
TRIZIVIR		17	1340.30	22785.10
TRUVADA 200/300MG/30	61958-0701-01	11	995.96	10955.56
VIREAD 300MG/30	61958-0401-01	4	642.95	2571.80
ZIAGEN		10	512.820	5128.20



431756.46

ZX



J

Will take everything except Abilify 30mg

etc

EXHIBIT B

(1)

- 644 - Nexium 40x30 — 154.81 = 77011.01
- 64 - Nexium 20x30 — 154.81 = 9907.84
- 130 - A-tripla — 1527.21 = 198537.30
- 199 - Reyataz 300 — 897.68 = 178638.32
- 12 - Reyataz 200 — 906.24 = 10874.88
- 20 - Reyataz 150 — 906.24 = 18124.80
- 705 - Singulair 10x30 — 121.60 = 85728
- 357 - Norvir — 257.17 = 91809.69
- 108 - Isentress 400 — 934.94 = 100973.52
- 291 - Truvada — 995.96 = 289824.36
- 3 - Epivir 300 — 389.54 = 1168.62
- 3 - Epivir 150 — 389.54 = 1168.62
- 8 - Selzentry 150 — 917.85 = 7342.80
- 5 - Valtrex 500 — 216.13 = 1080.65
- 18 - Sustiva — 531.25 = 9562.50
- 2 - Viramune — 482.70 = 965.80
- 21 - Plavix 75x30 — 144 = 3024
- 15 - Combivir — 827.48 = 12412.20
- 25 - Viread — 642.95 = 16073.75
- 86 - Prezista 600 — 918.50 = 78991.00
- 74 - Prezista 400 — 918.50 = 67969.00
- 37 - Lexiva — 724.53 = 26807.61
- 26 - Intelence 200 — 730.68 = 18997.68
- 20 - Intelence 100 — 730.68 = 14613.60
- 3 - Valtrex 1 — 351.56 = 1054.68

AV

ATTN: STEPHEN

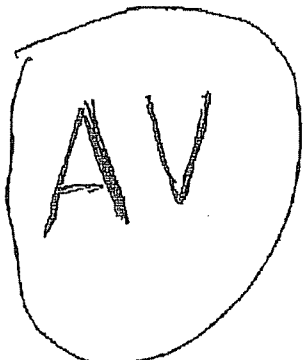
[Redacted]

[Redacted]

[Redacted]

(2)

- 69 - Ability 10x30 — 454.07 = 31330.83
- 25 - Ability 5x30 — 428.37 = 10709.25
- 41 - Ability 15x30 — 454.07 = 18616.87
- 86 - Cymbalta 30x30 — 129.42 = 11130.12
- 94 - Cymbalta 60x30 — 129.42 = 12165.48
- 13 - Cymbalta 20x30 — 129.42 = 1682.46
- 19 - Serenoel 300x60 — 690.80 = 13239.20
- 11 - Ability 2x30 — 428.13 = 4709.43
- 7 - Selzentry 300 — 917.85 = 6424.95
- 12 - Viracept — 703.35 = 8439
- 153 - Singulair 5x30 — 109.37 = 16733.61
- 1 - Serenoel 400x60XR — 740.80 = 740.80
- 1 - Serenoel 150x60XR — 436.80 = 436.80
- 299 - Advair 250/50 — 199.70 = 59770.10
- 31 - Advair 100/50 — 160.89 = 4987.59
- 29 - Advair 500/50 — 262.73 = 7624.77
- 84 - Epzicon — 894.46 = 75164.88
- 16 - Ziagen — 512.82 = 8205.12
- 9 - Trizivir — 1340.30 = 12602.70
- 2 - Serenoel 300x60XR — 630.34 = 1260.68
- 18 - Actos 30x30 — 202.30 = 3641.40
- 2 - Grodon 40x60 — 399.17 = 798.34
- 3 - Serenoel 50x100 — 449.58 = 1348.74
- 2 - Invirase 500x120 — 855.28 = 1710.56



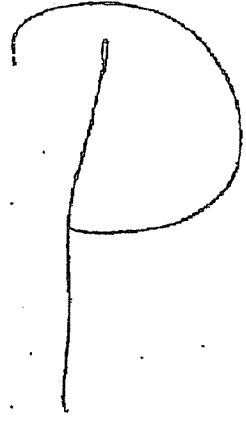
TOTAL
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EXHIBIT C



- 1200 SINGULAR 10 Mg
- 1100 NEXIUM 40 Mg
- 1100 ADVAIR 250 Mg
- 150 ADVAIR 100 Mg
- 100 ADVAIR 500 Mg
- 100 CYMBALTA 20, 60, 30Mg
- 30 NORVIR 100 Mg
- 30 TRIZIVIR 150/300 Mg
- 10 EPZICOM
- 2 ZIAGEN
- 350 ZYPREXA 10Mg ? -> better price
- 100 ZYPREXA 15Mg
- 100 ZYPREXA 5Mg
- 200 ZYPREXA 20Mg
- 20 SUSTIVA 600 Mg
- 10 VIRAMUNE
- 300 ABILIFY 10/ 5/ 15 Mg
- 100 300 ABILIFY 20 Mg -> better price
- 100 ABILIFY 30 Mg
- 100 ATRIPLA
- 20 LEXIVA
- 160 TRUVADA
- 6 EPIVIR 150 y 300 Mg
- 10 VIREAD
- 10 INTELENCE 100 Y 200 Mg
- 10 LOVASA
- PLAVIX 75Mg
- EMTRIVA 200 Mg
- 40 COMBIVIR 150 Y 300Mg
- 60 INSENTRESS
- SELSENTRY
- 30 PREZISTA 400 Mg y 600 Mg
- REYATAZ 200 Mg
- REYATAZ 150 Mg
- 700 REYATAZ 300Mg
- CRIVIVAN
- NEULASTA 0.6 Mg
- NEUPOGEN 480 Mg
- NEUPOGEN 300 Mg
- 15 30-meprom 750mg
- 225 1000-Kaletra - better price

What we will take

Stephen