

[statistical reports] to realize that we have some serious breaches of [the DATA law's cap on the number of patients a physician may treat] along with very careless and clinically unwarranted prescribing behaviors (% of patients above 24mg),” and certain physicians “need to be removed from the [buprenorphine] practice arena.” INDIVIOR managers also received firsthand reports from INDIVIOR salespeople and medical advisors that particular physicians were engaged in “continuous prescribing to patients known to be trafficking in Suboxone/Subutex;” allowing “prescriptions [to be] given when provider not present in office;” “charg[ing] 400 per month” for prescriptions; and suspected of allowing “overt trafficking in provider’s parking lot.”

101. INDIVIOR executives were aware of the careless, clinically unwarranted prescribing. On or about July 22, 2009, INDIVIOR’s chief executive officer wrote to INDIVIOR’s vice president for clinical affairs, “I think that the process for reporting rogue physicians is going to be very important.” On or about July 14, 2010, INDIVIOR executives met and discussed data indicating that the 564 highest-prescribing physicians in the United States prescribed buprenorphine-containing drugs to an average of more than 200 patients at a time, and the highest prescribers, which INDIVIOR called “Super P8s,” accounted for 33% of INDIVIOR’s business.

102. INDIVIOR continued to include physicians it knew were issuing careless, clinically unwarranted opioid prescriptions in the Here to Help and Treatment Advocate programs, and otherwise market Suboxone Film to them. On or about the stated dates, the identified INDIVIOR executives, employees, and agents communicated the information described below relating to aiding, abetting, counseling, commanding, inducing, and procuring Doctor A, located in or around Cedar Bluff, Galax, and Willis, Virginia, to switch prescriptions to Suboxone Film where Doctor A exceeded the maximum number of patients allowed at a time,

where daily doses exceeded the maximum indicated for additional clinical advantage, and where prescriptions were issued in a careless and clinically unwarranted manner:⁵

Par.	Date(s)	Personnel	Information
103	7/17/2008	INDIVIOR Risk Mgr. to INDIVIOR Med. Advisor	Email: INDIVIOR Risk Mgr. suspected that Doctor A's clinic was one of two possible sources of "1 to 2 controlled buys of Suboxone per week" by law enforcement
104	4/9/2009	INDIVIOR Risk Mgr. and others	Received statistical report: Doctor A prescribed buprenorphine-containing drugs to 805 individuals in February 2009, at daily doses higher than 24 mgs of buprenorphine to 428 of those individuals
105	8/28/2009	INDIVIOR Sales Spvsr. to INDIVIOR Risk Mgr.	Firsthand report: Doctor A intentionally mislabeled prescriptions for buprenorphine-containing drugs as being for pain management, when also prescribed for opioid addiction, to evade detection for violating the DATA patient limit
106	4/30/2010, 6/1/2011, 9/2/2011, 10/6/2011	"Here to Help" telephone operators	Here to Help operators referred opioid-addiction/dependence patients to Doctor A, using lists of enrolled prescribers in the patients' geographic areas
107	2011	INDIVIOR Sales Rep. to INDIVIOR Sales Spvsr.	Reports: met with Doctor A at least 28 times to encourage Doctor A to prescribe Suboxone Film
108	5/1/2012	"Here to Help" telephone operator	Here to Help operator referred an opioid-addiction/dependence patient to Doctor A, using a list of enrolled prescribers in the patient's geographic area
109	5/10/2012	INDIVIOR Sales Rep. to INDIVIOR Med. Advisor	Email: successfully convinced Doctor A to switch to prescribing Suboxone Film, as "Basically I lived with [Doctor A] last fall, seeing her once or twice a week, every week, even Saturdays; and eventually it paid off and her share of tablet vs film completely flip flopped"
110	4/12/2013, 4/26/2013	"Here to Help" telephone operators	Here to Help operators referred opioid-addiction/dependence patients to Doctor A, using lists of enrolled prescribers in the patients' geographic areas
111	9/10/2013	INDIVIOR Sales Rep. to INDIVIOR Risk Mgr.	Firsthand report: Doctor A is "[m]assively over cap [the maximum patient limit allowed under the DATA] . . . she also overdoses. . . This has been an ongoing problem since I started that only continues to get worse"
112	12/13/2013, 11/3/2014, 3/10/2015, 3/13/2015, 3/18/2015,	"Here to Help" telephone operators	Here to Help operators referred opioid-addiction/dependence patients to Doctor A, using lists of enrolled prescribers in the patients' geographic areas

⁵ These are illustrative examples, not an exhaustive list.

4/27/2015, 5/26/2015, 5/26/2015, 6/18/2015, 7/8/2015		
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113. On or about the stated dates, the identified INDIVIOR executives, employees, and agents communicated the information described below relating to aiding, abetting, counseling, commanding, inducing, and procuring Doctors B and C, located in or around Johnson City, Tennessee, to switch prescriptions to Suboxone Film where Doctors B and C exceeded the maximum number of patients allowed at a time, where daily doses exceeded the maximum indicated for additional clinical advantage, and where prescriptions were issued in a careless and clinically unwarranted manner:

Par.	Date(s)	Personnel	Information
114	4/9/2009	INDIVIOR Risk Mgr. and others	Received statistical report: in March 2009, Doctor B prescribed buprenorphine-containing drugs to 650 individuals, at daily doses higher than 24 mgs of buprenorphine to 618 of those individuals, and Doctor C prescribed buprenorphine-containing drugs to 635 individuals, at daily doses higher than 24 mgs of buprenorphine to 272 of those individuals
115	4/9/2009	INDIVIOR Employee, INDIVIOR Med. Advisor, and INDIVIOR Sales Spvsr.	Email re statistical report: "Notice your favorite, [Doctor B], is still at the top. I think now you can feel much more certain that he is likely a big source of diversion - 95% (618) of his patients are over 24mg. Wow!" Email further discussing report: "It appears that the 'high' doses may be the contributing factor to the diversion that continues to be reported in the Tri-Cities area of SE KY, NE TN, and SW VA"
116	5/28/2009	INDIVIOR Risk Mgr. to INDIVIOR Exec.	Email: "I am concerned about the Tri-Cities area in northeast Tennessee (also includes southeast KY and southwest VA). Physicians are prescribing for too many patients and the dosing is very high in some circumstances. 14 treating over 200 patients - range 200 to 800. 8 of 14 are prescribing doses >24 mg for at least 50% of their patients"
117	7/6/2009, 12/14/2009, 12/18/2009	"Here to Help" telephone operators	Here to Help operators referred opioid-addiction/dependence patients to Doctor C, using lists of enrolled prescribers in the patients' geographic areas
118	2/3/2010	"Here to Help" telephone operator	Here to Help operator referred an opioid-addiction/dependence patient to Doctor B; using a list of enrolled prescribers in the patient's geographic area

119	2/5/2010	"Here to Help" telephone operator	Here to Help operator referred an opioid-addiction/dependence patient to Doctor C, using a list of enrolled prescribers in the patient's geographic area
120	4/8/2010	INDIVIOR Sales Sprvsr. to INDIVIOR National Sales Sprvsr.	Email: Doctor B is "well over the allowed patient cap," and Doctor C's office "will prescribe to as many patients as they can fit in [while physicians are] in about 2-3 hours each week. In that time they quickly see the patient & provide a script"
121	6/2/2010	"Here to Help" telephone operator	Here to Help operator referred an opioid-addiction/dependence patient to Doctor C, using a list of enrolled prescribers in the patient's geographic area
122	11/20/2010	INDIVIOR Exec. to INDIVIOR Salespeople	Award: INDIVIOR sales rep. marketing Suboxone Film to Doctors B and C named Suboxone Film Marketing Blitz "Contest Winner" and credited with "incredible performance . . . 13 times the initial Contest patient threshold"
123	2010	INDIVIOR Exec. to INDIVIOR Salespeople	Award: INDIVIOR sales rep. marketing Suboxone Film to Doctors B and C recognized as INDIVIOR's sales rep. of the year
124	2010-2011	INDIVIOR Sales Rep. to INDIVIOR Sales Sprvsr.	Reports: met with Doctors B and C at least 75 times to encourage them to prescribe Suboxone Film
125	1/23/2012	"Here to Help" telephone operator	Here to Help operator referred an opioid-addiction/dependence patient to Doctor C, using a list of enrolled prescribers in the patient's geographic area
126	4/22/2013	INDIVIOR Sales Rep. and INDIVIOR Sales Sprvsr. to INDIVIOR Mgr.	Conversation: "It's a liability almost that we're even walking into these offices, these two main clinic offices [of Doctor C], because of how criminal it is. Like they have a Vegas-style cash machine sitting behind the office where they're taking stacks of hundreds and shoving it in there while we're trying to like, detail the nurse. It's like the mob. It's awful"
127	8/9/2013	"Here to Help" telephone operator	Here to Help operator referred an opioid-addiction/dependence patient to Doctor C, using a list of enrolled prescribers in the patient's geographic area

128. On or about the stated dates, the identified INDIVIOR executives, employees, and agents communicated the information described below relating to aiding, abetting, counseling, commanding, inducing, and procuring Doctor D, located in or around Danville, Kentucky, to switch prescriptions to Suboxone Film where Doctor D exceeded the maximum number of patients allowed at a time, where daily doses exceeded the maximum indicated for additional clinical advantage, and where prescriptions were issued in a careless and clinically unwarranted manner:

Par.	Date(s)	Personnel	Information
129	6/25/2008	INDIVIOR Sales Sprvsr. to INDIVIOR Sales Rep.	Coaching form: "Continue to Partner with [Doctor D's clinic] and their growing . . . organization. While it can appear the program is on auto-pilot, they still have much to learn, and we can help"
130	7/11/2008	INDIVIOR Sales Rep. to INDIVIOR Sales Sprvsr.	Report: "The 2nd [office of Doctor D's clinic] opened in Barboursville, the third one is scheduled to open in August and that will be in Frankfurt. The plan is to have 10 physicians in each clinic. Expanding trx in the South, one clinic at a time!"
131	12/17/2008	INDIVIOR Med. Advsr. to INDIVIOR Risk Mgr. and INDIVIOR Sales Sprvsr.	Email: Doctor D "is in difficulties with his organization of 30 MDs related to prescribing of Suboxone. This stems perhaps from a couple of problem patients and led to a state board investigation. Most of their patients are on 24 mg daily. . . . Is this group in Kentucky an area of concern for us? Is there any follow-up needed?"
132	7/23/2009, 8/13/2009, 8/31/2009	"Here to Help" telephone operators	Here to Help operators referred opioid-addiction/dependence patients to Doctor D, using lists of enrolled prescribers in the patients' geographic areas
133	9/23/2009	Doctor D to INDIVIOR Gov. Mgr. and INDIVIOR Sales Rep.	Email: "We are even more excited about the opportunities we have to facilitate each others' [sic] success. . . . We will keep our noses to the grindstone getting our program of care 'refined' and ask that you continue to keep your brain grinding on how to best 'use' us everywhere and any way it makes sense. We will keep [INDIVIOR] updated as we collaborate with Medicaid, private payors, the VA system, and anything/anyone else we come across. We are pursuing multiple grants as of yesterday evening for the call centerdatabase [sic]/website plan and indigent care for opiate addicts (those with no pay source), but if there is any way [INDIVIOR] can get involved financially, there will be great business benefit for [INDIVIOR] in the end (more patients being prescribed SBX) and amazing PR for each state you support"
134	9/23/2009	INDIVIOR Sales Sprvsr. to INDIVIOR Gov. Mgr.	Email: "We have had a difficult time giving [Doctor D] what he wanted, because most of his requests are out of pharma guidelines. . . . I can see you were able to provide him with opportunities and information that he sees as very valuable to his treatment center plans and goals. Thank you for helping [ensure Doctor D's clinic] sees the Integrated Value [INDIVIOR] has to offer"
135	1/4/2010, 5/13/2010, 5/17/2010, 9/7/2010, 9/30/2010, 10/19/2010, 10/26/2010, 11/10/2010	"Here to Help" telephone operators	Here to Help operators referred opioid-addiction/dependence patients to Doctor D, using lists of enrolled prescribers in the patients' geographic areas

136	12/8/2010	Doctor D to INDIVIOR Gov. Mgrs., INDIVIOR Sales Rep., and others	Report: in one month, Doctor D's clinic had prescribed buprenorphine-containing drugs to 1,659 individuals, at daily doses higher than 24 mgs of buprenorphine to 39% of them, and at daily doses of at least 24 mgs of buprenorphine to 76% of them. INDIVIOR's Public Sector Dir. forwarded the report to others at INDIVIOR, stating, "[w]ith over 76% of the patients at 24 mg and above, we have some serious work today in educating his organization and the physicians about dosing and overall quality care. The reverse should likely be the case"
137	12/23/2010, 1/5/2011, 1/10/2011, 1/28/2011, 3/25/2011, 4/21/2011, 4/22/2011, 5/5/2011, 5/11/2011, 5/16/2011, 5/17/2011, 5/25/2011, 6/8/2011, 6/27/2011, 8/12/2011, 8/15/2011, 8/19/2011, 9/15/2011, 10/3/2011, 10/19/2011, 11/4/2011, 11/30/2011	"Here to Help" telephone operators	Here to Help operators referred opioid-addiction/dependence patients to Doctor D, using lists of enrolled prescribers in the patients' geographic areas
138	2011	INDIVIOR Exec. to INDIVIOR Salespeople	Award: INDIVIOR sales rep. marketing Suboxone Film to Doctor D's clinic recognized as INDIVIOR's sales rep. of the year
139	2/2/2012	INDIVIOR Sales Rep. to INDIVIOR Sales Sprvsr.	Email: INDIVIOR to sponsor Doctor D's clinic's annual meeting, including breakfast and lunch for 46 people
140	2/13/2012, 2/16/2012, 3/7/2012, 4/9/2012, 4/18/2012, 5/2/2012, 5/16/2012	"Here to Help" telephone operators	Here to Help operators referred opioid-addiction/dependence patients to Doctor D, using lists of enrolled prescribers in the patients' geographic areas

141	6/4/2012	Kentucky Board of Medical Licensure	Indefinite restriction of Doctor D's authorization to prescribe buprenorphine-containing drugs for use in opioid addiction/dependence treatment
142	6/25/2012 through 12/2/2016	"Here to Help" telephone operators	About 140 instances in which Here to Help operators referred opioid-addiction/dependence patients to Doctor D, using lists of enrolled prescribers in the patients' geographic areas
143	3/31/2017	United States District Court for the Eastern District of Kentucky	Doctor D convicted of 17 counts of health care fraud

SUBOXONE TABLET PRICE INCREASES TO SUPPORT SCHEME

144. Between in or about 2010 and the date of this Indictment, INDIVIOR PLC, INDIVIOR INC. (also known as Reckitt Benckiser Pharmaceuticals Inc.), and their executives, employees, and agents also increased the price of Suboxone Tablet to cause patients to switch to Suboxone Film. In or about October 2011, an INDIVIOR manager told colleagues, "I could not support a tablet [price] increase again before next October. That would be essentially another 37% over 24 months. . . . If we are considering the patient in all of this, then we need to understand that 40% will have to remain on the tablet due to supply constraints. . . . We also need to consider the public health backlash and that of physicians." In or about July 2012, INDIVIOR increased the price of Suboxone Tablet by 15%, stating the "Rationale of Price Increase" as "accelerate conversion to Film."

REVENUE AND PROFIT

145. In or about the specified years, INDIVIOR INC. (also known as Reckitt Benckiser Pharmaceuticals Inc.) and Company A received approximately the following revenues from sales of Suboxone Film:

Year	Revenue
2010	\$83,328,721
2011	\$400,615,412
2012	\$666,695,781

2013	\$887,469,559
2014	\$843,047,500

In or about the same years, Medicare and Medicaid payments for Suboxone Film were approximately as follows:

Year	Medicare	Medicaid
2010	\$2,134,000	\$7,136,000
2011	\$26,188,000	\$108,079,000
2012	\$70,329,000	\$211,294,000
2013	\$132,984,000	\$326,666,000
2014	\$147,704,000	\$386,685,000

146. In or about September 2012, Company A stated that it would give “special recognition awards” of thousands of shares of Company A stock to about ten INDIVIOR executives and managers for the commercial success of Suboxone Film, saying it had “created a long-term sustainable business model for” INDIVIOR.

147. On or about August 5, 2013, INDIVIOR’s chief executive officer emailed Company A’s chief executive officer and others, stating that Suboxone Film’s share of the market had grown to 69.1%, which was “almost enough to make you wonder when we will break through the 70% share barrier?” Company A’s chief executive officer replied-all, “I agree, our US team has done a fantastic job of defending our film share thus far.”

148. On or about November 17, 2013, INDIVIOR’s chief executive officer stated to an INDIVIOR manager that in switching physicians, pharmacists, health care benefit programs, and others to Suboxone Film, INDIVIOR had achieved “the best format conversion ever in the history of the industry.”

COUNT ONE

Conspiracy to Commit Mail, Wire, and Health Care Fraud

The Grand Jury charges that:

1. The Introduction to this Indictment and the factual allegations of Counts Two through Twenty-eight are realleged and incorporated as if fully set forth herein.
2. Between in or about 2006 and the date of this Indictment, in the Western District of Virginia and elsewhere, INDIVIOR PLC, INDIVIOR INC. (also known as Reckitt Benckiser Pharmaceuticals Inc.), and others known and unknown to the Grand Jury knowingly conspired to commit the following offenses:
 - a. Mail fraud, in violation of Title 18, United States Code, Section 1341, that is, having devised and intending to devise the scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises described in the Introduction to this Indictment, and for the purpose of executing such scheme and artifice and attempting to do so, did knowingly cause to be delivered by the Postal Service and any private or commercial interstate carrier certain matters and things according to the directions thereon;
 - b. Wire fraud, in violation of Title 18, United States Code, Section 1343, that is, having devised and intending to devise the scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises described in the Introduction to this Indictment, and for the purpose of executing such scheme and artifice and attempting to do so, transmitted and caused to be transmitted by means of wire communication in interstate commerce writings, signals, and sounds;

c. Health care fraud, in violation of Title 18, United States Code, Section 1347, that is, knowingly and willfully executed and attempted to execute the scheme and artifice to defraud and to obtain by means of materially false and fraudulent pretenses, representations, and promises money and property owned by and under the custody and control of Medicare, Medicaid, private insurance providers, and other health care benefit programs in connection with the delivery of and payment for health care benefits, items, and services, described in the Introduction of this Indictment.

3. In furtherance of the conspiracy, and to effect its object, INDIVIOR PLC, INDIVIOR INC. (also known as Reckitt Benckiser Pharmaceuticals Inc.), and others known and unknown to the Grand Jury committed the overt acts described in the Introduction to this Indictment, and Counts Two through Twenty-eight of this Indictment.

4. All in violation of Title 18, United States Code, Section 1349.

COUNT TWO
Health Care Fraud

The Grand Jury charges that:

1. The Introduction to this Indictment and the factual allegations of Counts One and Three through Twenty-eight are realleged and incorporated as if fully set forth herein.

2. Between in or about 2006 and the date of this Indictment, in the Western District of Virginia and elsewhere, INDIVIOR PLC and INDIVIOR INC. (also known as Reckitt Benckiser Pharmaceuticals Inc.), and others known and unknown to the Grand Jury, as principals and aiders and abettors, knowingly and willfully executed and attempted to execute a scheme and artifice to (1) defraud health care benefit programs as defined in Title 18, United States Code, Section 24(b), including Medicaid, Medicare, other public health care programs, private insurance providers, and other health care benefit programs, and (2) obtain by means of

materially false and fraudulent pretenses, representations, and promises, money and property owned by and under the custody and control of said health care benefit programs, in connection with the delivery of and payment for health care benefits, items, and services.

3. It was the object of the scheme and artifice to fraudulently induce physicians to write prescriptions for Suboxone Film, pharmacists to fill prescriptions for Suboxone Film, and health care benefit programs to provide coverage of prescriptions for Suboxone Film, and to cause:

- a. Patients to obtain Suboxone Film from pharmacies and others;
- b. Patients, pharmacies, and others to submit claims for Suboxone Film to health care benefit programs;
- c. Health care benefit programs to pay claims for Suboxone Film;
- d. Pharmacies and others to make payments to wholesalers, distributors, and others for Suboxone Film; and
- e. Wholesalers, distributors, and others to make payments to INDIVIOR PLC and INDIVIOR INC. (also known as Reckitt Benckiser Pharmaceuticals Inc.) for sales of Suboxone Film made as a result of the scheme and artifice to defraud.

4. In furtherance of the scheme and artifice, and to effect its object, INDIVIOR PLC, INDIVIOR INC. (also known as Reckitt Benckiser Pharmaceuticals Inc.), and others known and unknown to the Grand Jury, for the purpose of causing health care providers and others to prescribe and dispense Suboxone Film, and to recommend the prescribing and dispensing of Suboxone Film, did, and aided, abetted, counseled, commanded, induced, and procured others to, make materially false and fraudulent statements and representations, including the following:

a. Representing to physicians, pharmacists, and other health care providers that Suboxone Film is safer and less susceptible to misuse, abuse, diversion, and accidental child exposure than other, similar drugs, and has other unsubstantiated effects such as weeding out drug seekers, making patients feel less like addicts, protecting physicians from being criminally prosecuted, and protecting office-based treatment of opioid addiction/dependence from being banned;

b. Producing and disseminating printed marketing materials representing that Suboxone Film is safer and less susceptible to misuse, abuse, diversion, and accidental child exposure than other, similar drugs, containing misleading text, graphics, and charts;

c. Representing to government officials, employees, and agents administering various state Medicaid programs, and others, that Suboxone Film is safer and less susceptible to misuse, abuse, diversion, and accidental child exposure than other, similar drugs, to cause such government officials, employees, and agents, and others to expand and maintain Medicaid coverage of Suboxone Film at substantial cost to the government and substantial profit to the defendants; and

d. Providing patient referrals, presentations, marketing materials, access to lunch and dinner events, and other benefits to physicians they knew were prescribing buprenorphine-containing drugs to more patients at a time than allowed by federal law (*i.e.*, the DATA), at daily doses higher than the maximum dose of any demonstrated additional clinical advantage (*i.e.*, 24 mgs of buprenorphine), and in a careless and clinically unwarranted manner.

5. All in violation of Title 18, United States Code, Sections 2 and 1347.

COUNTS THREE THROUGH SIX
Mail Fraud

The Grand Jury charges that:

1. The Introduction and the factual allegations of Counts One through Two and Seven through Twenty-eight are realleged and incorporated as if fully set forth herein.
2. Between in or about 2006 and the date of this Indictment, in the Western District of Virginia and elsewhere, INDIVIOR PLC, INDIVIOR INC. (also known as Reckitt Benckiser Pharmaceuticals Inc.), and others known and unknown to the Grand Jury, with the intent to defraud, devised and willfully participated in, with knowledge of its fraudulent nature, the scheme and artifice to defraud and obtain money and property by materially false and fraudulent pretenses, representations, and promises described in the Introduction and in the factual allegations of Counts One through Two and Seven through Twenty-eight of this Indictment.
3. On or about the date specified as to each count below, in the Western District of Virginia, for the purpose of executing and attempting to execute such scheme and artifice to defraud, INDIVIOR PLC, INDIVIOR INC. (also known as Reckitt Benckiser Pharmaceuticals Inc.), and others known and unknown to the Grand Jury caused to be delivered by mail and private or commercial interstate carrier according to the direction thereon, the named matter and thing, namely, marketing visual aids containing materially false and fraudulent representations that Suboxone Film is safer and less susceptible to misuse, abuse, diversion, and accidental child exposure than other, similar drugs, including misleading text, graphics, and charts, to an INDIVIOR sales representative in Roanoke, Virginia, who promoted Suboxone Film to physicians, pharmacists, and others in locations including Blacksburg, Cedar Bluff, Charlottesville, Christiansburg, Danville, Galax, Lynchburg, Roanoke, Salem, Staunton, Willis, and Wytheville, Virginia:

COUNT	DATE
THREE	February 6, 2012
FOUR	January 4, 2013
FIVE	March 21, 2013
SIX	August 19, 2013

4. All in violation of Title 18, United States Code, Sections 2 and 1341.

COUNTS SEVEN THROUGH TWENTY-EIGHT
Wire Fraud

The Grand Jury charges that:

1. The Introduction and the factual allegations of Counts One through Six are realleged and incorporated as if fully set forth herein.

2. Between in or about 2006 and the date of this Indictment, in the Western District of Virginia and elsewhere, INDIVIOR PLC, INDIVIOR INC. (also known as Reckitt Benckiser Pharmaceuticals Inc.), and others known and unknown to the Grand Jury, with the intent to defraud, devised and willfully participated in, with knowledge of its fraudulent nature, the scheme and artifice to defraud and obtain money and property by materially false and fraudulent pretenses, representations, and promises described in the Introduction and the factual allegations of Counts One through Six of this Indictment.

3. On or about the date specified as to each count below, in the Western District of Virginia and elsewhere, for the purpose of executing and attempting to execute such scheme and artifice to defraud, INDIVIOR PLC, INDIVIOR INC. (also known as Reckitt Benckiser Pharmaceuticals Inc.), and others known and unknown to the Grand Jury, caused to be transmitted by wire communication or radio communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, namely, reports of clinical liaisons falsely and fraudulently representing to physicians, pharmacists, and other health care providers that Suboxone-Film is safer and less susceptible to misuse, abuse, diversion, and accidental child

exposure than other, similar drugs, transmitted from Florida and New Jersey to locations in the Western District of Virginia, and referrals of prospective patients to Doctor A, transmitted from Pennsylvania to locations in the Western District of Virginia, as described below:

COUNT	DATE	ITEM
SEVEN	April 30, 2010	Referral to Doctor A
EIGHT	October 9, 2010	Activity Report with Model Safety Claims
NINE	October 24, 2010	Activity Report with Model Safety Claims
TEN	November 29, 2010	Activity Report with Model Safety Claims
ELEVEN	June 1, 2011	Referral to Doctor A
TWELVE	July 8, 2011	Activity Report with Model Safety Claims
THIRTEEN	September 2, 2011	Referral to Doctor A
FOURTEEN	October 6, 2011	Referral to Doctor A (1 of 2 on this date)
FIFTEEN	October 6, 2011	Referral to Doctor A (2 of 2 on this date)
SIXTEEN	May 1, 2012	Referral to Doctor A
SEVENTEEN	April 12, 2013	Referral to Doctor A
EIGHTEEN	April 26, 2013	Referral to Doctor A
NINETEEN	December 13, 2013	Referral to Doctor A
TWENTY	November 3, 2014	Referral to Doctor A
TWENTY-ONE	March 10, 2015	Referral to Doctor A
TWENTY-TWO	March 13, 2015	Referral to Doctor A
TWENTY-THREE	March 18, 2015	Referral to Doctor A
TWENTY-FOUR	April 27, 2015	Referral to Doctor A
TWENTY-FIVE	May 26, 2015	Referral to Doctor A (1 of 2 on this date)
TWENTY-SIX	May 26, 2015	Referral to Doctor A (2 of 2 on this date)
TWENTY-SEVEN	June 18, 2015	Referral to Doctor A
TWENTY-EIGHT	July 8, 2015	Referral to Doctor A

4. All in violation of Title 18, United States Code, Sections 2 and 1343.

NOTICE OF FORFEITURE

1. The Introduction and the factual allegations of Counts One through Twenty-Eight of this Indictment are realleged and made part of this Notice.

2. Upon conviction of one or more of the felony offenses alleged in this Indictment, INDIVIOR PLC and INDIVIOR INC. (also known as Reckitt Benckiser Pharmaceuticals Inc.) shall forfeit to the United States:

a. pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes, or is derived from proceeds traceable to a violation of any offense constituting “specified unlawful activity” (as defined in section 1956(c)(7)), or a conspiracy to commit such offense; and

b. pursuant to 18 U.S.C. § 982(a)(7), property, real or personal, that constitutes, or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense.

3. The property to be forfeited to the United States includes, but is not limited to, the following:

a. **Monetary Judgment:** Not less than \$3,000,000,000 (three billion dollars) in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate was obtained directly or indirectly as a result of said offenses or is traceable to such property.

b. **Business Entities (including all assets, inventory, and property related thereto):** Indivior Finance (2014) LLC; Indivior Finance SARL; Indivior Global Holdings Ltd (a/k/a RBP Global Holdings Limited); Indivior Inc. (a/k/a Reckitt Benckiser Pharmaceuticals Inc.); Indivior PLC; Indivior Solutions Inc. (a/k/a Reckitt Benckiser Pharmaceuticals Solutions Inc.); and Indivior US Holdings Inc. (f/k/a RBP US Holdings Inc.).

c. **Bank Accounts, all funds received and on deposit as set forth below:**

	Bank	Account Name	Account #
(1)	Bank of America	Indivior Inc. (a/k/a Reckitt Benckiser Pharmaceuticals Inc.)	██████████
(2)	JP Morgan Chase	Indivior Inc.	██████████
(3)	JP Morgan Chase	Indivior Inc.	██████████

(4)	JP Morgan Chase	Indivior Inc.	[REDACTED]
(5)	JP Morgan Chase	Indivior Solutions Inc. (a/k/a Reckitt Benckiser Pharmaceuticals Solutions Inc.)	[REDACTED]
(6)	JP Morgan Chase	Reckitt Benckiser Pharmaceuticals Inc. - Catalyst /ASO CGLIC as ADMIN - ERISA Account	[REDACTED]
(7)	JP Morgan Chase	Reckitt Benckiser Pharmaceuticals Inc. - Catalyst /ASO CGLIC as ADMIN - ERISA Account	[REDACTED]
(8)	JP Morgan Chase (Great Britain)	Indivior PLC	[REDACTED]
(9)	JP Morgan Chase (Great Britain)	Indivior PLC	[REDACTED]
(10)	JP Morgan Chase (Great Britain)	Reckitt Benckiser Pharm Inc.	[REDACTED]
(11)	Wells Fargo	Indivior Inc.	[REDACTED]
(12)	Institutional Cash Distributors (ICD), LLC	Indivior PLC	[REDACTED]

d. **Trademarks:**

	Serial No., Registration No.
(1)	86779039
(2)	86779033
(3)	86779029
(4)	86779026
(5)	79151424, 4718643

e. **Patents:**

	Patent Number	Patent Title
(1)	8,475,832	Sublingual and buccal film compositions

(2)	8,497,280	Medicinal compositions comprising buprenorphine and nalmeferne
(3)	8,697,718	Pack of medicinal tablets
(4)	8,912,211	Medicinal compositions comprising buprenorphine and naltrexone
(5)	8,921,387	Injectable flowable composition comprising buprenorphine
(6)	8,975,270	Injectable flowable composition comprising buprenorphine
(7)	9,101,625	Buprenorphine-wafer for drug substitution therapy
(8)	9,180,197	Sustained delivery formulations of risperidone compounds
(9)	9,186,413	Sustained delivery formulations of risperidone compounds
(10)	9,272,044	Injectable flowable composition buprenorphine
(11)	9,370,512	Buprenorphine-wafer for drug substitution therapy

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant, cannot be located upon the exercise of due diligence; has been transferred or sold to or deposited with a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of the above described forfeitable property pursuant to 21 U.S.C. § 853(p), including the assets described above, and including but not limited to the following assets:

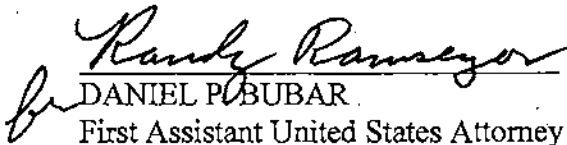
a. **Accounts Receivable, all amounts due from the following entities:**

(1)	Amerisource Bergen
(2)	Burlington Drug
(3)	Cardinal Health
(4)	Dakota Drug Inc
(5)	Dixon Shane LLC

(6)	Harvard Drug Group
(7)	HD Smith
(8)	Integrated Commercialization Solutions
(9)	JM Smith
(10)	Luis Garraton
(11)	McKesson
(12)	Morris Dickson
(13)	MWI Vet Supply
(14)	NC Mutual Drug Company
(15)	Rochester Drug
(16)	Valley Wholesale
(17)	Value Drug Company

A TRUE BILL, this 9th day of April, 2019.

18/Grand Jury Foreperson


DANIEL P. BUBAR

First Assistant United States Attorney
Attorney for the United States, Acting Under Authority Conferred by 28 U.S.C. § 515

JAMES M. BURNHAM
Deputy Assistant Attorney General
Civil Division
Department of Justice

GUSTAV W. EYLER
Acting Director
Consumer Protection Branch
Department of Justice