

Rajaratnam, Arjun

From: Singer, Chris A
Sent: Friday, February 22, 2002 6:15 PM
To: Rajaratnam, Arjun
Cc: Werner, Mark M
Subject: RE: Pride Program

Arjun- Thanks for the update on the Greg Thorpe situation. On the first issue, although I'm sure we have communicated that the CPP parameters apply to these types of programs, I'm not sure that reps are as aware as they should be. This is principally because PRIDE and FIRST programs are marketing funded programs that are administered through a vendor (SCS). Thus, the degree of involvement in the logistics of the programs at the rep level is generally marginal at best. My advice would be that we communicate to all parties involved (e.g. the field, marketing and the vendor) that all GSK programs, whether they are field or marketing generated are subject to the CPP limits and guidelines. We need to do this universally across all divisions. On the second issue, I'm assuming that these physicians have gone through speaker training on WSR. If so, they should be aware of what the guidelines are around discussing off-label indications since that is normally covered in the training process. Can we confirm that these individuals have been trained? In any case, I cannot condone allowing physicians to use GSK speaker programs as venues to market their books, irrespective of whether they involve off label indications or not. If you can get me more details around this, I will be more than glad to discuss with the local management team and RVP.

Thanks
CS

-----Original Message-----

From: Rajaratnam, Arjun
Sent: Friday, February 22, 2002 2:31 PM
To: Singer, Chris A
Cc: Werner, Mark M
Subject: Pride Program

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Chris:

In investigating allegations by Greg Thorpe, a Rep. in Jim Lamb's region (I think you know about this guy), two observations have come up.

1. PRIDE program. Two perceptions about this program arise from the interviews with several Reps. One is that CPP limits do not apply to PRIDE as it is not noted in the PRIDE manual. The second is that the vendor for PRIDE monitors and manages the CPP limits so the Rep. has no responsibility for meeting CPP limits. Let me add that I don't know anything about this program except that it is used for speaker events.

Should we should do something to correct this with the Reps and/or the vendor, or in the manual? Also, does this vendor work through Professional Programs under Bill Judd?

2. Off-Label Speaker Events: We also found use of two doctors who seem to be experts on ADHD used for many events sponsored by Wellbutrin, although generally the topic noted was general - e.g. Depression. One of these guys has written a book it seems on using wellbutrin for ADHD and was even selling his book at one event. We have noted observations here that off-label discussions by these two doctors at these events was normal.

Any thoughts on how to respond to this from a GSK perspective? Given that these doctors have been used by several districts on several occasions, this would not appear to be localized or individualized.

In summary, can you help me find a way to show GSK's due diligence in response to these observations.

Thanks

Arjun Rajaratnam
Compliance Officer - Global Pharmaceuticals
GlaxoSmithKline