



National Association of Drug Diversion Investigators, Inc.
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Established in 1987, the National Association of Drug Diversion Investigators (NADDI), is a unique organization whose members are responsible for investigating, prosecuting, and preventing pharmaceutical drug diversion. NADDI has proven to be a valuable asset to law enforcement, the pharmaceutical industry, and health regulatory professionals.

NADDI's principal activities comprise:

- (1) Cooperative education and training in the specifics of pharmaceutical drug diversion, investigation and prevention;
- (2) The sharing of investigative information and communication with a wide variety of interested parties with regard to the nature, scope and impact of pharmaceutical drug diversion, and;
- (3) The development of stronger effective measures to combat the problem.

NADDI supports the safety and efficacy of the new drug application (NDA) 21-196, XYREM® (sodium oxybate), proposed to reduce the incidence of cataplexy and to improve the symptom of daytime sleepiness for persons with narcolepsy.

NADDI is aware that in many reported cases, use of GHB has changed from homemade GHB to ingesting of industrial chemicals that convert to GHB in the body. There are no known cases which involve XYREM.

Rather than consider the above issues as tangential, Orphan Medical has gotten involved, helping to educate and uncover solutions in conjunction with stakeholders such as NADDI.

Input has been sought regarding distribution systems that will minimize and identify potential diversion situations, allowing diversion investigators to more easily perform their jobs. It is the job of the pharmaceutical diversion professionals to investigate potential diversion, however, Orphan is willing to cooperate with the appropriate local, state, and federal agencies.

Thank you for consideration of this written submission. I would also be willing to provide oral submission of behalf of the organization.

Sincerely,

A handwritten signature in black ink that reads "Charles F. Cichon". The signature is written in a cursive, flowing style.

Charles F. Cichon
President