

AK DISTRIBUTORS

32 Commerce Center Dr. Ste.H-89 Henderson, NV 89014
PH# (702) 458-5855 /Fax (702)458-5866/ Toll Free (888) 257-7517

May 23, 2000

Mr. Tony Young
Piper, Marbury, Rudnick & Wolfe
1200 Nineteenth Street, NW
Washington, DC 20036-2430

Dear Tony:

Based upon AK Distributor's experience in the wholesale drug distribution market, we do not believe nor are we aware of any situation where the PDMA's pedigree requirement have positively impacted the quality control of prescription drugs in wholesale commerce.

We believe that the state licensing requirements for wholesale distributors contribute to the quality of prescription drugs in wholesale commerce, not the requirements set forth by the PDMA.

Sincerely,



Eugene Braddy R.Ph.
President

**Product
Performance
Company, Inc.**

50 Hub Drive
Melville, NY 11747
631-293-4800 Fax 631-293-9424

May 23, 2000

Sal Riccardi
President/CEO
Supreme Distributors

Dear Sal,

Concerning the effectiveness of the PDMA, it should be very clear and obvious to anyone in the industry, as well as FDA's enforcement people, that the requirement that pharmaceuticals must be purchased from a duly licensed wholesaler has unequivocally been the overwhelming deterrent to the introduction of counterfeit and adulterated pharmaceuticals into the marketplace. Certainly, unscrupulous people are screened out of the channels of distribution by having to go through the licensing process.

The individual States (and Federal government in the absence of a State licensing requirement) are most logically the principal point of the enforcement process by eliminating unworthy applicants. The Pedigree quite simply would require so much manpower in FDA enforcement people that it is unrealistic, inefficient and unmanageable. No one in receipt of a given Pedigree can attest to its authenticity without extensive investigation. The industry has relied upon the companies they buy from for credibility, and confidence in that credibility is most convincingly supported by proof that the seller has been appropriately licensed and supervised by the State from which it trades

Sincerely,
Stephen Herman
Product Performance Company

Memo



UltraCare

To: Bruce Krichmar

From: Shelia Clark

Date: 5/10/00

Re: Pedigree Requirement

I am writing this letter to address the current process of pedigree requirements. From my viewpoint they are not influential in maintaining the quality of drugs in wholesale distribution. Presently, only a few distributors are able to provide pedigrees. The pedigrees that we are able to obtain are usually hand-written by someone within the company. The invoices that we receive have the same amount of information as a pedigree.

I believe it is each distributor's responsibility to deal with reputable companies. We purchase our products from licensed wholesale distributors who have a good name in the prescription drug industry. This is more of an asset to our company and much more reliable than a piece of paper.

I do not feel that the pedigree requirements have either helped or otherwise dealt with the sale of subpotent, adulterated, counterfeit or misbranded drugs.

Sincerely,

Shelia Clark
Vice President

58 Norfolk Avenue • South Easton, MA 02375-0600
1-800-231-7014 • FAX 800-555-0516



Rebel Distributors Corp.

31238 Via Collinas, Unit D
Westlake Village, CA 91362
www.RebelRx.com

Tel. (818) 865-6880 - Fax (818) 865-6885

May 10th 2000

Dear Sir/ Madam,

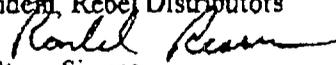
Re:PDMA and Drug Product Integrity

As a licensed pharmaceutical wholesaler in over thirty states, and a company that has been in business since 1984, we recognize the value you place on opinions we have regarding the potential sale of "subpotent, adulterated, counterfeit, misbranded and the general distribution of safe and effective drugs".

Our experience has clearly shown us that the pedigree requirements, (as proposed in the newest version of the Prescription Drug Marketing Act), will have *little or no* beneficial effect as to the integrity of pharmaceutical products as a whole. We are, and have been for many years, held to extremely high standards, both by state and federal law to insure the utmost in all aspects of pharmaceutical distribution. It is up to all of us in the industry to set procedures, which insures the consumer absolute safety and integrity of the products they buy.

We are convinced that those (although we feel strongly that it represents a fraction of the industry) who are determined to not follow proper papertrail requirements will do so regardless of any new standards set forth in the PDMA. And that the addition of more layers of paperwork and requirements will only hinder the vast majority of wholesalers who already follow the state and federal laws with the highest level of integrity and accountability.

Sincerely, Ronald Ressner
President, Rebel Distributors


Cc: Steve Simms
Sal Ricciardi



May 8, 2000

Mr. Tony Young
Piper, Marbury Rudnick & Wolfe
1200 Nineteenth Street, NW
Washington, DC 20036-2430

Dear Tony:

Based upon Supreme's experience in the wholesale drug distribution market, we do not believe nor are we aware of any situation where the PDMA's pedigree requirement have positively impacted the quality control of prescription drugs in wholesale commerce.

We believe that the state licensing requirements for wholesale distributors contribute to the quality of prescription drugs in wholesale commerce, not the requirements set forth by the PDMA.

Sincerely,

A handwritten signature in dark ink, appearing to read "Bruce Krichmar", written in a cursive style.

Bruce Krichmar
VP of Accounting Operations

08-05-00P02:45 RCVD

Handwritten initials "BT" in dark ink, written in a stylized, blocky font.