



April 27, 2009

Minnesota Board of Pharmacy  
2829 University Avenue Southeast, Suite 530  
Minneapolis, Minnesota 55414-3251

RE: Wholesale Drug Distributor License No. 360375-0  
Licensee: ER Squibb & Sons, Inc. (n/k/a E.R. Squibb & Sons, L.L.C.)  
Reporting Period: January 1, 2008-December 31, 2008

On behalf of Licensee, enclosed please find a report of payments made to Practitioners in the State of Minnesota, as the term is defined in section 151.01 of the Minnesota Statute. The information in this report is based on our good faith understanding of the Minnesota Statutes, sections 151.461 and 151.47(f).

Bristol-Myers Squibb (BMS) is reporting information on behalf of the Licensee with respect to its businesses which include BMS and ConvaTec. ConvaTec does not manufacture, sell or distribute drugs to Practitioners therefore there is no information reported with respect to ConvaTec. Please note that ConvaTec was a BMS division for the period of January 1, 2008 through August 1, 2008, the date of the sale of the ConvaTec business to Nordic Capital Fund VII and Avista Capital Partners. Additionally, Lantheus Medical Imaging, a BMS-affiliated entity that was sold on January 8, 2008, is registered as a drug wholesaler in MN under License No. 360883.

BMS is a pharmaceutical manufacturer with multiple divisions and has undertaken reasonable and good faith efforts to identify the required information with respect to its covered promotional and research activities. With respect to promotional activities, we have identified and included in the enclosed report information regarding contractual payments (*i.e.*, speaker and consultant fees) and related expenses (*i.e.*, meals, travel and lodging expenses) associated with the performance of the contracted services.

With respect to research activities, we have identified and included in the enclosed report direct payments to Practitioners made in connection with clinical trials. BMS occasionally makes payments for research activities to institutions, universities, contract research organization and other business entities which, in turn, may make payments to Practitioners. Such payments are not included in the enclosed report. BMS also provides funding for medical conferences, professional meetings and continuing medical education. Funding for these activities is provided through a grant to an organization who, in turn, may make payments to Practitioners. BMS does not select these Practitioners and the funding is provided for activities over which BMS has no control or influence thus, payments by these providers to Practitioners are not listed in the enclosed report.

As previously noted, BMS has multiple divisions with many systems including manual processes to capture information, thus it is not an easy task to collect, identify and aggregate this information. However, BMS continues to make process and system improvements that are designed to facilitate the collection, identification and aggregation of all data required for disclosure. BMS is committed to continuous improvement and if any additional data from the reporting period becomes known after the date of this disclosure, BMS shall supplement the enclosed report.

Excluded from this report are payments to Practitioners by market research organizations with which BMS has contracted. Market research vendors with whom we have worked during the reporting period generally protect the identity of both the sponsor and the healthcare professionals who participate in market research studies and/or are prohibited by industry ethics guidelines, such as The Code of Marketing Research Standards, from disclosing such information without the express permission of the participant(s). As such, the identity of any Practitioners who participated in double blind market research services provided by vendors is not known to BMS and thus cannot be reported. However, we have reported payments made to Practitioners for marketing surveys where the identity of the Practitioners was known.

Lastly, please note the enclosed report includes additional specificity in the column marked "Specific reason for payment."

Should you have questions, or need additional information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Doreen Shulman". The signature is written in a cursive, flowing style.

Doreen Shulman

Enclosure