



Date May 1, 2009

Minnesota Board of Pharmacy
2829 University Avenue SE
Suite 530
Minneapolis, MN 55414-3253

Re: UCB, Inc. – 2008 Minnesota Reporting Filing

Dear Minnesota Board of Pharmacy:

UCB, Inc. has enclosed our Gifts to Practitioners Reporting Form for Drug Distributors in the attached Excel document, UCB_State of MN Payments to Practitioners Report Form- 2008.xls, as required by Minn. Stat. §§ 151.47. This document covers the period between January 1, 2008 – December 31, 2008.

The following disclosures/assumptions relate to the UCB, Inc. ("UCB") Minnesota (MN) filing:

- It is UCB's business policy that individual gifts or payments valued at less than \$5 are excluded from its calculation of payments to healthcare providers ("HCPs") for the purpose of tracking and reporting. As a result, any expenditure valued less than \$5 may not be included in UCB's disclosure.
- Through third party vendors, UCB conducts blinded market research using HCPs. These HCPs are chosen and paid by third party vendors for feedback in focus groups, surveys, advisory boards, and other activities. UCB does not know which HCPs are performing this market research and in turn, the HCPs are unaware of who has employed the third party vendor who has hired them. Since this research is blinded, UCB does not report these payments to HCPs or any meals or business courtesies associated with the market research.

If you have any questions or comments, please contact me at (770)-970-8372 or email at clive.davis@ucb.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Clive Davis', is written over a white background.

Clive Davis

UCB, Inc.

VP & Chief Compliance Officer USA

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Smyrna, GA 30080

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