

April 27, 2010

Pfizer, Inc.
235 East 42nd Street
New York, NY 10017
ATTN: Public Relations or Press Office

Dear Sir or Madam:

The Project On Government Oversight (POGO) has updated its Federal Contractor Misconduct Database (<http://www.contractormisconduct.org/>), a compilation of information from public resources regarding government contractors, including Pfizer, Inc. I have enclosed the findings relevant to your company, and I am seeking verification of this data.

Any response would be greatly appreciated, as the accuracy of this information is in the best interest of all parties. Out of fairness to Pfizer, Inc., please be assured that any response received by POGO will be posted on the website along with the data. Please note that the database includes pending instances, but these are kept separate from resolved instances and are not included in the totals.

If you have any questions, I can be reached at (202) 347-1122. Thank you for your time and consideration.

Sincerely,

Neil Gordon
Investigator

Enclosure

Instances

1. Illegal Marketing of Bextra and Other Drugs

Date: 09/02/2009 (Date of Announcement)

Misconduct Type: Health

Enforcement Agency: Multiple Agencies

Contracting Party: None

Court Type: Criminal

Amount: \$2,300,000,000

Disposition: Pleaded Guilty

Synopsis: In September 2009, Pfizer agreed to pay \$2.3 billion to settle federal and state civil and criminal allegations that it had illegally marketed four drugs -- Bextra, Geodon, Zyvox, and Lyrica -- with the intent to defraud or mislead by promoting the drugs for non-approved uses. \$1.3 billion of that was paid by Pfizer subsidiary Pharmacia & Upjohn Company, Inc., which pleaded guilty to a felony violation of the Food, Drug and Cosmetic Act for its promotion of Bextra. Pfizer paid a \$1 billion civil fine to settle allegations it had illegally promoted the drugs for uses that were not approved by the U.S. Food and Drug Administration (FDA) and caused false claims to be submitted to Medicare and Medicaid programs. Pfizer denied all of the civil allegations, with the exception that Pfizer acknowledged certain improper actions related to the promotion of Zyvox.

2. Illegal Marketing of Neurontin

Date: 05/13/2004 (Date of Announcement)

Misconduct Type: Health

Enforcement Agency: Multiple Agencies

Contracting Party: None

Court Type: Criminal

Amount: \$430,000,000

Disposition: Pleaded Guilty

Synopsis: Pfizer agreed to plead guilty to violating the Federal Food, Drug, and Cosmetic Act and pay the federal and state governments more than \$430 million in civil and criminal fines to resolve false claims allegations that Warner-Lambert, which Pfizer acquired in 2000, illegally marketed its epilepsy drug Neurontin between 1996 and 2000. As part of the settlement agreement, Pfizer also agreed to enter into a Corporate Integrity Agreement with the Department of Health and Human Services.

3. Lipitor False Claims

Date: 10/28/2002 (Date of Announcement)

Misconduct Type: Government Contract Fraud

Enforcement Agency: Health and Human Servs.

Contracting Party: Multiple Agencies

Court Type: Civil

Amount: \$49,000,000

Disposition: Settlement

Synopsis: In October 2002, Pfizer and its subsidiaries Warner-Lambert and Parke-Davis paid \$49 million to resolve False Claims Act charges that it had fraudulently avoided paying rebates owed to state and federal health programs by failing to report best prices for its cholesterol drug Lipitor. Parke-Davis Labs, then a subsidiary of Warner-Lambert, which was subsequently acquired by Pfizer in 2000, allegedly overstated the Lipitor best price in the first and second quarters of 1999 by concealing \$250,000 of cash discounts that were given to a key managed care customer in Louisiana in exchange for favorable status on the managed care organization's drug formulary. As part of the settlement, Pfizer also entered into a five-year corporate integrity agreement with the Department of Health and Human Services Office of Inspector General to prevent similar violations from occurring in the future.

4. Illegal Marketing of Genotropin

Date: 04/02/2007 (Date of Announcement)

Misconduct Type: Health

Enforcement Agency: Multiple Agencies

Contracting Party: None

Court Type: Criminal

Amount: \$34,700,000

Disposition: Pleaded Guilty

Synopsis: In 2007, Pfizer subsidiaries Pharmacia & Upjohn Company, Inc., and Pharmacia & Upjohn Company, LLC paid \$34.7 million to resolve charges stemming from the off-label marketing of Genotropin — a human growth hormone medicine — and the inappropriate use of a vendor contract to increase the sales of other Pharmacia medicines. Both settlements cover activities that occurred at Pharmacia before that company was acquired by Pfizer in 2003. Pharmacia & Upjohn Company Inc. also pleaded guilty to a single count of offering to an outside vendor remuneration in the form of an award of a contract to manage a Genotropin patient assistance program as an inducement for recommending the purchase of Pharmacia medicines. Pharmacia & Upjohn Company LLC entered into a Deferred Prosecution Agreement with the Department of Justice.

5. Illegal Testing in Nigeria

Date: 07/30/2009 (Date of Settlement)

Misconduct Type: Health

Enforcement Agency: International

Contracting Party: None

Court Type: Criminal

Amount: \$75,000,000

Disposition: Settlement

Synopsis: Pfizer agreed to pay \$75 million to the Nigerian government to settle criminal and civil charges that the company illegally tested an experimental antibiotic called Trovan on children during a 1996 meningitis epidemic. Nigerian authorities claim Pfizer's test of Trovan, for which it had not properly obtained consent, killed 11 children and disabled many more.

6. McClain v. Pfizer (Whistleblower Retaliation)

Date: 02/16/2007 (Date of Filing)

Misconduct Type: Labor

Enforcement Agency: Non-Governmental

Contracting Party: None

Court Type: Civil

Amount: \$1,370,000

Disposition: Judgment Against Defendant

Synopsis: In April 2010, a federal jury in Connecticut awarded \$1.4 million in compensatory damages to former Pfizer scientist Becky McClain, who claimed she was fired when she tried to raise safety concerns about genetic engineering work being done at the company's Groton laboratory. McClain, a molecular biologist, claimed she had been wrongly terminated for complaining about faulty safety equipment that allowed a dangerous lentivirus to infect her and some of her colleagues.