



PROJECT ON GOVERNMENT OVERSIGHT

October 25, 2011

Court Square Capital Partners  
Park Avenue Plaza  
55 East 52nd Street, 34th Floor  
New York, NY 10055

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 Court Square Capital Partners. 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 Court Square Capital Partners, 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,

A handwritten signature in blue ink, appearing to read 'Neil Gordon', with a long horizontal flourish extending to the right.

Neil Gordon  
Investigator

Enclosure

## **Instance**

### **DEA Suspension of Distribution License**

**Date:** 06/15/2010 (Date of Suspension Announcement)

**Misconduct Type:** Health

**Enforcement Agency:** Justice

**Contracting Party:** None

**Court Type:** Administrative

**Amount:** \$0

**Disposition:** Administrative Agreement

**Synopsis:** In June 2010, the U.S. Drug Enforcement Agency (DEA) temporarily suspended Harvard Drug Group's license to distribute DEA-controlled substances and listed chemicals. A DEA investigation found several of Harvard Drug Group's largest purchasers were illegally dispensing oxycodone, the generic name for the pain-killing drug OxyContin. The investigation revealed that Harvard Drug Group distributed over 13 million dosage units of oxycodone products to customers between March 2008 and March 2010. The DEA and Harvard Drug Group eventually reached an agreement to scale back the suspension as to certain classes of controlled substances.

## **Pending Instance**

### **Conrad v. Abbott Laboratories, et al. (Illegal Marketing of Unapproved Drugs)**

**Date:** 01/14/2011 (Date of Amended Complaint)

**Misconduct Type:** Health

**Enforcement Agency:** Non-Governmental

**Contracting Party:** None

**Court Type:** Civil

**Amount:** \$0

**Disposition:** Pending

**Synopsis:** Constance Conrad filed a False Claims Act lawsuit alleging Harvard Drug Group (formerly Major Pharmaceuticals) and other small and mid-sized pharmaceutical companies sidestepped the Food and Drug Administration (FDA) drug approval process to manufacture and distribute unapproved drugs which were prescribed to Medicaid patients.