



STATE OF IDAHO

OFFICE OF THE ATTORNEY GENERAL

LAWRENCE G. WASDEN

May 10, 2019

*Via Federal Express, Tracking No. 775191943664*

Gregory P. Joseph  
Mara Leventhal  
JOSEPH HAGE AARONSON LLC  
485 Lexington Avenue, 30th Floor  
New York, New York 10017

**Re: *Opioid Marketing and Sales Practices*  
Notice of Intent to File Suit**

Dear Mr. Joseph and Ms. Leventhal:

The Office of the Idaho Attorney General has been given the responsibility of enforcing the provisions of the Idaho Consumer Protection Act (CPA), codified at title 48, chapter 6, Idaho Code, and the Idaho Rules of Consumer Protection (CPR), promulgated thereunder. He also has authority under other portions of the Idaho Code to address the actions of Richard S. Sackler, Jonathan D. Sackler, David A. Sackler, and Beverly Sackler (collectively, the “Sacklers”) with regards to the sale and marketing of opioids.

Based on our investigation to date, we believe that the Sacklers, in the sale and marketing of opioid products, have engaged in at least the following violations of the CPA and CPR:

Idaho Code § 48-603(17) which prohibits engaging in any act or practice which is otherwise misleading, false, or deceptive to the consumer.

Idaho Code § 48-603(18) which prohibits engaging in any unconscionable method, act or practice in the conduct of trade or commerce.

Idaho Code § 48-603C which prohibits unconscionable methods, acts or practices in the conduct of trade or commerce.

Based on our investigation to date, we also have reason to believe that the Sacklers have engaged in actions that are negligent and constitute a public nuisance with regard to these marketing and sales practices. Given the ongoing efforts of a group of States—of which the Office of the Idaho Attorney General has been a part—to investigate, (in some instances) litigate, and discuss potential resolution of the concerns raised herein as they relate to the companies the Sacklers have directed, controlled and overseen, the Attorney

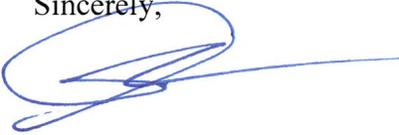
Mr. Joseph and Ms. Leventhal  
May 10, 2019  
Page 2 of 2

General deems that you have been provided ample opportunity to appear before him and execute a Consent Judgment. The Attorney General has also determined that further delay in filing suit will substantially and materially impair the purposes of the CPA and that it is in the public interest to file a lawsuit against the Sacklers, seeking damages, civil penalties, attorney fees and costs, and injunctive relief.

This letter serves as his notice of the Attorney General's intent and as his finding for purposes of proceeding forward.

Please let Division Chief Brett DeLange know if the Sacklers will accept service of process, and if so, to whom service should be directed. Mr. DeLange can be reached at [brett.delange@ag.idaho.gov](mailto:brett.delange@ag.idaho.gov) or (208) 334-4114. If we do not hear from you within 10 days from the date of this letter, we will proceed with service of process.

Sincerely,



SHERMAN FUREY  
Chief Deputy Attorney General

cc: Brett DeLange