

EXHIBIT 1

CHRISTOPHER MADEL

4725 Vine Hill Road
Deephaven, MN 55331
612-605-6601
612-327-4991
cmadel@madellaw.com

May 9, 2017

Katherine L. Myrick, Chief
Freedom of Information/Privacy Act Unit
FOI/Records Management Section
Drug Enforcement Administration
8701 Morrissette Drive
Springfield, VA 22152

Dear Chief Myrick:

Pursuant to the Freedom of Information Act (FOIA), please send me the following:

1. For each month (or quarter) and year from November 20, 2012 to May 29, 2017, all documents that state and/or include data regarding Cardinal Health, Inc.'s distribution of oxycodone to persons¹ located in the State of Georgia, including, but not limited to, for each month (or quarter) and year from November 20, 2012 to May 29, 2017, the identity of each person in the State of Georgia that Cardinal Health, Inc. distributed the oxycodone to, and the quantity of oxycodone that Cardinal Health, Inc. distributed to that person (in dosage units and grams).
2. For each month (or quarter) and year from November 20, 2012 to May 29, 2017, all documents that state and/or include data regarding CVS Caremark's distribution of oxycodone to persons located in the State of Georgia, including, but not limited to, for each month (or quarter) and year from November 20, 2012 to May 29, 2017, the identity of each person in the State of Georgia that CVS

¹ For the purposes of each of the requests included in this letter, the term "person" shall mean an individual, governmental entity, sole proprietorship, corporation, limited liability company, firm, trust, partnership, or incorporated or unincorporated association existing under or authorized by the laws of this state, another state, or a foreign country, and the term "person" shall include, but not be limited to, all "practitioners" as that term is defined by 21 U.S.C. § 802(21).

Caremark distributed the oxycodone to, and the quantity of oxycodone that CVS Caremark distributed to that person (in dosage units and grams).

3. For each month (or quarter) and year from November 20, 2012 to May 29, 2017, all documents that state and/or include data regarding Walgreen Co.'s distribution of oxycodone to persons located in the State of Georgia, including, but not limited to, for each month (or quarter) and year from November 20, 2012 to May 29, 2017, the identity of each person in the State of Georgia that Walgreen Co. distributed the oxycodone to, and the quantity of oxycodone that Walgreen Co. distributed to that person (in dosage units and grams).
4. For each month (or quarter) and year from January 1, 2006 to May 29, 2017, all documents that state and/or include data regarding Cardinal Health, Inc.'s distribution of oxycodone to persons located in the State of Michigan, including, but not limited to, for each month (or quarter) and year from November 20, 2012 to May 29, 2017, the identity of each person in the State of Michigan that Cardinal Health, Inc. distributed the oxycodone to, and the quantity of oxycodone that Cardinal Health, Inc. distributed to that person (in dosage units and grams).
5. For each month (or quarter) and year from January 1, 2006 to May 29, 2017, all documents that state and/or include data regarding CVS Caremark's distribution of oxycodone to persons located in the State of Michigan, including, but not limited to, for each month (or quarter) and year from November 20, 2012 to May 20, 2017, the identity of each person in the State of Michigan that CVS Caremark distributed the oxycodone to, and the quantity of oxycodone that CVS Caremark distributed to that person (in dosage units and grams).
6. For each month (or quarter) and year from January 1, 2006 to May 29, 2017, all documents that state and/or include data regarding Walgreen Co.'s distribution of oxycodone to persons located in the State of Michigan, including, but not limited to, for each month (or quarter) and year from November 20, 2012 to May 29, 2017, the identity of each person in the State of Michigan that Walgreen Co. distributed the oxycodone to, and the quantity of oxycodone that Walgreen Co. distributed to that person (in dosage units and grams).
7. For each month (or quarter) and year since from November 20, 2012 to May 29, 2017, reports ## 1, 2, 3, 4, 5, 6, and 7 from the ARCOS-2 database (in dosage units and grams).

For each of the above-stated requests, I would be pleased to accept the requested data in an electronic format accessible through the Microsoft suite of products, such as Microsoft Excel. Furthermore, it is my understanding that the data requested in request ## 1-3 reside in the Drug Enforcement Agency's ARCOS-2 database. Accordingly,

please construe request ## 1-3 to include data from the ARCOS-2 database, and I would be amenable to limiting your search of responsive documents to that database if you produce data that fully complies with these requests.

Additionally, per the purported requirements found on DEA's website (found at <https://www.dea.gov/FOIA/FOIA.shtml>), please be advised of the following information:

Requester's full name: Christopher William Madel
Complete address: 4725 Vine Hill Road, Deephaven, MN 55331
Date of birth: December 31, 1966
Place of birth: Waseca, Minnesota, USA
Notarized signature: See below

For purposes of your withholding analysis, we note that the Honorable Judge Magnuson in the U.S. District Court for the District of Minnesota has noted, in denying the DEA and DOJ's motion for summary judgment involving similar requests for information:

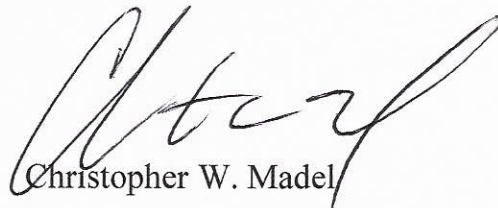
It is the Court's view that company-specific information by the buyer's county, business activity, drug type, transaction date, dosage units, and total grams for the years Madel requests is not exempt from disclosure under (b)(4) and is reasonably segregable from exempt information in these spreadsheets. In addition, in light of the release of [ARCOS] report 1, buyer zip codes might also be reasonably segregable and not exempt from disclosure.

Madel v. United States Department of Justice et al., 13-cv-02832, at 8 (D. Minn. Jan. 11, 2017).

Please feel free to contact me with any questions at the above address, telephone numbers, or cmadel@madellawcom.

Thank you for your prompt attention to this matter.

Very truly yours,

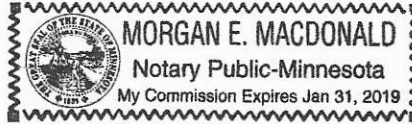


Christopher W. Madel

Notary:

Subscribed and sworn to before me

this 9th day of May, 2017



A handwritten signature in black ink, consisting of several sweeping, connected strokes, positioned above a horizontal line.

Notary Public