

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

AMERISOURCEBERGEN CORPORATION;
AMERISOURCEBERGEN DRUG
CORPORATION; and INTEGRATED
COMMERCIALIZATION SOLUTIONS, LLC,

Defendants.

Jury Trial Demanded

Civ. A. No. _____

COMPLAINT

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The United States of America brings this civil enforcement action against AmerisourceBergen Corporation, AmerisourceBergen Drug Corporation, and Integrated Commercialization Solutions, LLC (collectively, “Defendants”) for their violations of the Comprehensive Drug Abuse Prevention and Control Act of 1970, 21 U.S.C. §§ 801 *et seq.* (“Controlled Substances Act” or “CSA”). In support of this complaint, the United States alleges as follows:

INTRODUCTION

1. The opioid epidemic has had profound and devastating effects on this country and its citizens. This action seeks to hold Defendants civilly liable for their role in this epidemic.
2. Because of their significant potential for diversion and abuse, opioids and other controlled substances are regulated by the CSA and the implementing regulations issued by the Drug Enforcement Administration (“DEA”).
3. In order to prevent controlled substances from being diverted for illegal uses, the CSA requires wholesalers that distribute controlled substances to pharmacies and other customers to monitor their customers’ controlled-substance orders.
4. A controlled-substance order that has an unusual size, deviates substantially from a normal pattern, has an unusual frequency, or carries other indicia of suspicion must be reported to DEA unless the distributor conducts an investigation that dispels all suspicion. If suspicion remains after an investigation, or if no investigation is undertaken, the distributor must report the order to DEA, regardless of whether the distributor fills the order.
5. This legal obligation requires distributors either to look into their customers’ orders if there is suspicious activity and resolve the suspicion or to alert DEA to their customers’ suspicious behavior.

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