

obtained their prescriptions from South Florida doctors, and then filled their prescriptions in Sanford.²²

Paul Doering, a professor at the University of Florida's College of Pharmacy who was asked to review the case for the government, opined that there were red flags when customers who lived out of state came into the Sanford stores. He said he could not "foresee any explanation for this set of red flags that would satisfy my professional obligation not to fill the scripts."²³

Despite the suspicious circumstances, the pharmacists filled prescriptions for millions of oxycodone pills in recent years. CVS's misconduct at the two Sanford pharmacies was deemed so egregious by U.S. drug enforcement administrator Michele Leonhart that she banned the pharmacies from dispensing controlled substances—which include OxyContin, Vicodin, Ritalin, and Xanax, among others. This effort was part of the state of Florida and Attorney General Pam Bondi's ongoing efforts to curb Florida's prescription drug epidemic.²⁴

WALGREENS SETTLEMENT

On June 11, 2013, it was reported that the DEA reached an \$80 million settlement with Walgreens over rule violations that allowed tens of thousands of units of powerful painkillers such as oxycodone to illegally wind up in the hands of drug addicts and dealers. Mark R. Trouville, chief of the U.S. DEA's Miami field office, said Walgreens committed numerous record-keeping and dispensing violations of the Controlled Substances Act at a major East Coast distribution center in Jupiter, Florida, and at six retail pharmacies around the state. The drugs also included hydrocodone and Xanax. Authorities said the Jupiter center failed to flag suspicious orders of drugs it received from pharmacies, and the retail outlets routinely filled prescriptions that clearly were not for a legitimate medical use.²⁵

CVS Pharmacy and Walgreens are well-run pharmacy chains with excellent reputations. In my opinion, the 1% rule I identified in my introduction certainly came into play in both of these cases. CVS has approximately 200,000 employees in 45 states, Puerto Rico, and the District of Columbia,²⁶ while Walgreens has approximately 240,000 employees.²⁷ One percent "bad employees" still amounts to 4,400 "bad people" within