

## **State Attorneys General**

### **A Communication from the Chief Legal Officers of the Following States and Territories:**

**Alaska \* Arizona \* Arkansas \* Connecticut \* Delaware  
Florida \* Georgia \* Guam \* Hawaii \* Illinois \* Indiana \* Iowa \* Kentucky  
Maine \* Maryland \* Massachusetts \* Michigan \* Mississippi \* Nevada  
New Hampshire \* North Carolina \* Oregon \* Pennsylvania \* Rhode Island  
South Dakota \* Tennessee \* Utah \* Vermont \* Washington**

December 10, 2013

Margaret Hamburg, M.D.  
Commissioner of Food and Drugs  
U.S. Food and Drug Administration  
10903 New Hampshire Avenue  
Silver Spring, MD 20993

Dear Dr. Hamburg:

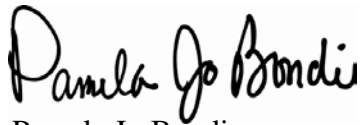
We write to you out of concern regarding your agency's recent approval of a new high-dose narcotic painkiller. We believe your approval of Zohydro ER has the potential to exacerbate our nation's prescription drug abuse epidemic because this drug will be the first hydrocodone-only opioid narcotic that is reportedly five to ten times more potent than traditional hydrocodone products, and it has no abuse-deterrent properties.

State Attorneys General do not want a repeat of the recent past when potent prescription painkilling drugs entered the market without abuse-deterrent qualities and without clear guidance on how they were to be prescribed. This created an environment whereby our nation witnessed a vicious cycle of overzealous pharmaceutical sales, doctors over-prescribing the narcotics, and patients tampering with these drugs, ultimately resulting in a nationwide prescription drug epidemic claiming thousands of lives.

We hope that the FDA either reconsiders its approval of Zohydro ER, or sets a rigorous timeline for Zohydro ER to be reformulated to be abuse-deterrent while working with other federal agencies to impose restrictions on how Zohydro ER can be marketed and prescribed.

Law enforcement officers, public health workers, and substance abuse treatment providers are just now beginning to stem the tide of prescription drug addiction. We do not want to see their dedicated work undone. Thank you for your consideration and we look forward to your response.

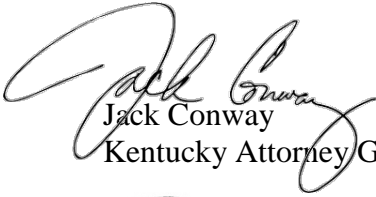
Sincerely,



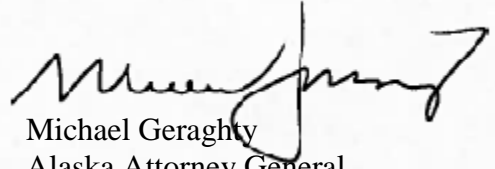
Pamela Jo Bondi  
Florida Attorney General




Samuel S. Olens  
Georgia Attorney General



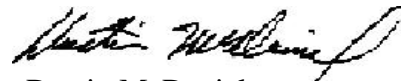
Jack Conway  
Kentucky Attorney General



Michael Geraghty  
Alaska Attorney General



Tom Horne  
Arizona Attorney General



Dustin McDaniel  
Arkansas Attorney General



George Jepsen  
Connecticut Attorney General



Joseph R. "Beau" Biden III  
Delaware Attorney General



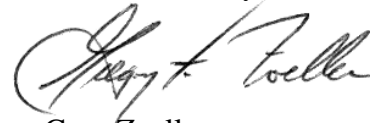
Lenny Rapadas  
Guam Attorney General



David Louie  
Hawaii Attorney General



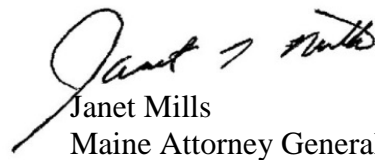
Lisa Madigan  
Illinois Attorney General



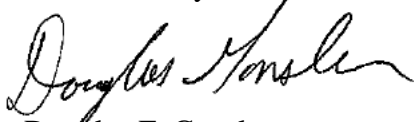
Greg Zoeller  
Indiana Attorney General



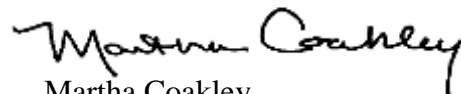
Tom Miller  
Iowa Attorney General



Janet Mills  
Maine Attorney General



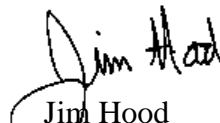
Douglas F. Gansler  
Maryland Attorney General



Martha Coakley  
Massachusetts Attorney General



Bill Schuette  
Michigan Attorney General



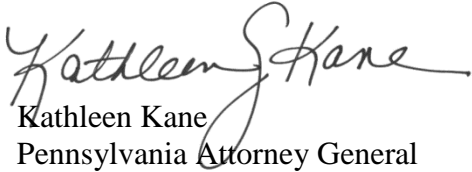
Jim Hood  
Mississippi Attorney General



Catherine Cortez Masto  
Nevada Attorney General



Roy Cooper  
North Carolina Attorney General



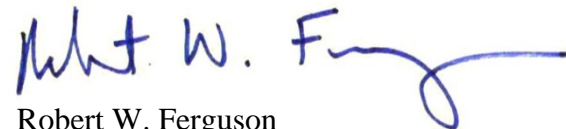
Kathleen Kane  
Pennsylvania Attorney General



Marty Jackley  
South Dakota Attorney General



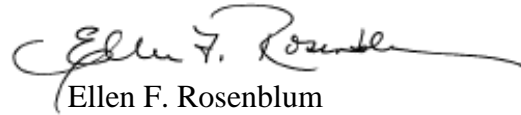
Brian Tarbet  
Acting Utah Attorney General



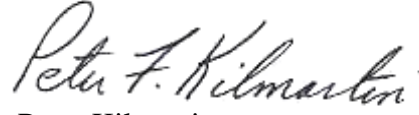
Robert W. Ferguson  
Washington Attorney General



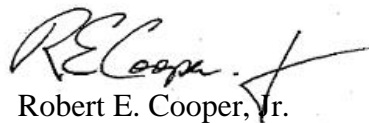
Joseph Foster  
New Hampshire Attorney General



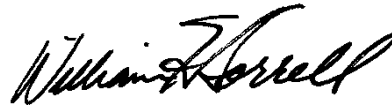
Ellen F. Rosenblum  
Oregon Attorney General



Peter Kilmartin  
Rhode Island Attorney General



Robert E. Cooper, Jr.  
Tennessee Attorney General



William H. Sorrell  
Vermont Attorney General