

Complaint

IN THE MATTER OF

CVS CAREMARK CORPORATIONCONSENT ORDER, ETC., IN REGARD TO ALLEGED VIOLATIONS OF
SEC. 5 OF THE FEDERAL TRADE COMMISSION ACT*Docket No. C-4259; File No. 072 3119**Complaint, June 18, 2009 – Decision, June 18, 2009*

This consent order addresses CVS Caremark Corporation's failure to provide reasonable and appropriate security for sensitive information routinely obtained from consumers and employees. The complaint alleges that CVS failed to: (1) implement policies and procedures to dispose securely of such information, including, but not limited to, policies and procedures to render the information unreadable in the course of disposal; (2) adequately train employees to dispose securely of such information; (3) use reasonable measures to assess compliance with its established policies and procedures for the disposal of such information; or (4) employ a reasonable process for discovering and remedying risks to such information. Additionally, CVS pharmacies discarded materials containing sensitive information in clear readable text in unsecured, publicly-accessible trash dumpsters on numerous occasions. The order prohibits misrepresentations about the security, confidentiality, and integrity of sensitive information and requires CVS to establish and maintain a comprehensive information security program that is reasonably designed to protect the security, confidentiality, and integrity of sensitive personal information (whether in paper or electronic format) about consumers, employees, and those seeking to become employees.

Participants

For the *Commission*: *Loretta Garson and Alain Sheer.*

For the *Respondent*: *Anthony E. DiResta and Mark S. Melodia, ReedSmith LLP.*

COMPLAINT

The Federal Trade Commission ("Commission"), having reason to believe that CVS Caremark Corporation ("respondent" or "CVS") has violated the provisions of the Federal Trade Commission Act,

Complaint

and it appearing to the Commission that this proceeding is in the public interest, alleges:

5. Respondent CVS is a Delaware corporation with its principal office or place of business at One CVS Drive, Woonsocket, Rhode Island, 02895. It conducts business through several wholly-owned subsidiaries and limited liability companies, including, but not limited to, CVS Pharmacy, Inc.

6. The acts and practices of respondent as alleged in this complaint are in or affecting commerce, as “commerce” is defined in Section 4 of the Federal Trade Commission Act.

RESPONDENT’S BUSINESS

7. At all relevant times, respondent has been in the business of selling prescription and non-prescription medicines and supplies, as well as other products. It operates, among other things, approximately 6,300 retail pharmacy stores in the United States (collectively, “CVS pharmacies”) and online and mail order pharmacy businesses. Respondent allows consumers buying products in CVS pharmacies to pay for their purchases with credit, debit and electronic benefit transfer cards (collectively, “payment cards”); insurance cards; personal checks; or cash.

8. In conducting its business, respondent routinely obtains information from or about its customers, including, but not limited to, name; telephone number; address; date of birth; bank account number; payment card account number and expiration date; driver’s license number or other government-issued identification; prescription information, such as medication and dosage, prescribing physician name, address, and telephone number, health insurer name, and insurance account number and policy number; and Social Security number (collectively, “personal information”). Respondent also collects sensitive information from or about its employees, including, but not limited to, Social Security number.

Complaint

9. Respondent operates computer networks that connect various components of its business, including CVS pharmacies, parts of the online and mail order pharmacy businesses, corporate headquarters, and distribution centers. Among other things, respondent uses the networks to aggregate, store, and transmit personal information; fill orders for prescription medicines and supplies; and process sales, including to obtain authorization for payment card and insurance card transactions.

RESPONDENT'S REPRESENTATIONS

10. Since at least 2003, respondent has disseminated or caused to be disseminated statements and privacy policies, including, but not necessarily limited to, the following statement regarding the privacy and confidentiality of personal information:

CVS/pharmacy wants you to know that nothing is more central to our operations than maintaining the privacy of your health information ("Protected Health Information" or "PHI"). PHI is information about you, including basic information that may identify you and relates to your past, present, or future health or condition and the dispensing of pharmaceutical products to you. We take this responsibility very seriously. (CVS Privacy Policy, attached as Exhibit A.)

RESPONDENT'S SECURITY PRACTICES

11. Respondent has engaged in a number of practices that, taken together, failed to provide reasonable and appropriate security for personal information. Among other things, respondent has failed to: (1) implement policies and procedures to dispose securely of such information, including, but not limited to, policies and procedures to render the information unreadable in the course of disposal; (2) adequately train employees to dispose securely of such information; (3) use reasonable measures to assess compliance with its established policies and procedures for the disposal of such

Complaint

information; or (4) employ a reasonable process for discovering and remedying risks to such information.

12. As a result of the failures set forth in Paragraph 7, CVS pharmacies discarded materials containing personal information in clear readable text (such as prescriptions, prescription bottles, pharmacy labels, computer printouts, prescription purchase refunds, credit card receipts, and employee records) in unsecured, publicly-accessible trash dumpsters on numerous occasions. For example, in July 2006 and continuing into 2007, television stations and other media outlets reported finding personal information in unsecured dumpsters used by CVS pharmacies in at least 15 cities throughout the United States. The personal information found in the dumpsters included information about both CVS's customers and its employees. When discarded in publicly-accessible dumpsters, such information can be obtained by individuals for purposes of identity theft or the theft of prescription medicines.

VIOLATIONS OF THE FTC ACT

9. Through the means described in Paragraph 6, respondent represented, expressly or by implication, that it implemented reasonable and appropriate measures to protect personal information against unauthorized access.

10. In truth and in fact, respondent did not implement reasonable and appropriate measures to protect personal information against unauthorized access. Therefore, the representation set forth in Paragraph 9 was, and is, false or misleading.

11. As set forth in Paragraph 7, respondent failed to employ reasonable and appropriate measures to prevent unauthorized access to personal information. Respondent's practices caused, or are likely to cause, substantial injury to consumers that is not offset by countervailing benefits to consumers or competition and is not reasonably avoidable by consumers. This practice was, and is, an unfair act or practice.

Complaint

THEREFORE, the Federal Trade Commission this eighteenth day of June, 2009, has issued this complaint against respondent.

By the Commission.

Decision and Order

DECISION AND ORDER

The Federal Trade Commission having initiated an investigation of certain acts and practices of the Respondent named in the caption hereof, and the Respondent having been furnished thereafter with a copy of a draft Complaint that the Bureau of Consumer Protection proposed to present to the Commission for its consideration and which, if issued by the Commission, would charge the Respondent with violation of the Federal Trade Commission Act, 15 U.S.C. § 45 *et seq*;

The Respondent, its attorney, and counsel for the Commission having thereafter executed an Agreement Containing Consent Order (“Consent Agreement”), an admission by the Respondent of all the jurisdictional facts set forth in the aforesaid draft Complaint, a statement that the signing of said Consent Agreement is for settlement purposes only and does not constitute an admission by Respondent that the law has been violated as alleged in such Complaint, or that the facts as alleged in such Complaint, other than jurisdictional facts, are true, and waivers and other provisions as required by the Commission’s Rules; and

The Commission having thereafter considered the matter and having determined that it has reason to believe that the Respondent has violated the said Act, and that a Complaint should issue stating its charges in that respect, and having thereupon accepted the executed Consent Agreement and placed such Consent Agreement on the public record for a period of thirty (30) days, and having duly considered the comments filed thereafter by interested persons pursuant to Section 2.34 of its Rules, now in further conformity with the procedure described in Section 2.34 of its Rules, the Commission hereby issues its Complaint, makes the following jurisdictional findings and enters the following Order:

1. Respondent CVS Caremark Corporation is a Delaware corporation with its principal office or place of business at One CVS Drive, Woonsocket, Rhode Island, 02895.

Decision and Order

2. The Federal Trade Commission has jurisdiction of the subject matter of this proceeding and of the Respondent, and the proceeding is in the public interest.

ORDER**DEFINITIONS**

For purposes of this order, the following definitions shall apply:

1. Unless otherwise specified, “store” shall mean each pharmacy entity or store location that sells prescription medicines, drugs, devices, supplies, or services and/or non-prescription products and services.
2. Unless otherwise specified, “LLC” shall mean a limited liability company: (a) that owns, controls, or operates one or more stores (including, but not limited to, the companies identified in attached Exhibit A), and (b) in which CVS Caremark Corporation is a member, directly or indirectly.
3. Unless otherwise specified, “respondent” shall mean CVS Caremark Corporation, its subsidiaries, divisions, affiliates, and LLCs, and its successors and assigns.
4. “Personal information” shall mean individually identifiable information from or about an individual consumer including, but not limited to: (a) a first and last name; (b) a home or other physical address, including street name and name of city or town; (c) an email address or other online contact information, such as an instant messaging user identifier or a screen name; (d) a telephone number; (e) a Social Security number; (f) a driver’s license number or other government-issued identification number; (g) prescription information, such as medication and dosage, and prescribing physician name, address, and telephone number, health insurer name, insurance account number, or insurance policy number; (h) a bank account, debit card, or credit card account number; (i) a

Decision and Order

persistent identifier, such as a customer number held in a “cookie” or processor serial number, that is combined with other available data that identifies an individual consumer; (j) a biometric record; or (k) any information that is combined with any of (a) through (j) above. For the purpose of this provision, a “consumer” shall include an “employee,” and an individual seeking to become an employee, where “employee” shall mean an agent, servant, salesperson, associate, independent contractor, and other person directly or indirectly under the control of respondent.

5. “Commerce” shall mean as defined in Section 4 of the Federal Trade Commission Act, 15 U.S.C. § 44.

I.

IT IS ORDERED that respondent, and its officers, agents, representatives, and employees, directly or through any corporation, subsidiary, limited liability company, division, or other device, in connection with the advertising, marketing, promotion, offering for sale, or sale of any product or service, in or affecting commerce, shall not misrepresent in any manner, expressly or by implication, the extent to which it maintains and protects the privacy, confidentiality, security, or integrity of personal information collected from or about consumers.

II.

IT IS FURTHER ORDERED that respondent, and its officers, agents, representatives, and employees, directly or through any corporation, subsidiary, limited liability company, division, or other device, in connection with the advertising, marketing, promotion, offering for sale, or sale of any product or service, in or affecting commerce, shall, no later than the date of service of this order, establish and implement, and thereafter maintain, a comprehensive information security program that is reasonably designed to protect the security, confidentiality, and integrity of personal information collected from or about consumers. Such program, the content and

Decision and Order

implementation of which must be fully documented in writing, shall contain administrative, technical, and physical safeguards appropriate to respondent's size and complexity, the nature and scope of respondent's activities, and the sensitivity of the personal information collected from or about consumers, including:

- A. the designation of an employee or employees to coordinate and be accountable for the information security program.
- B. the identification of material internal and external risks to the security, confidentiality, and integrity of personal information that could result in the unauthorized disclosure, misuse, loss, alteration, destruction, or other compromise of such information, and assessment of the sufficiency of any safeguards in place to control these risks. At a minimum, this risk assessment should include consideration of risks in each area of relevant operation, including, but not limited to: (1) employee training and management; (2) information systems, including network and software design, information processing, storage, transmission, and disposal; and (3) prevention, detection, and response to attacks, intrusions, or other systems failures.
- C. the design and implementation of reasonable safeguards to control the risks identified through risk assessment, and regular testing or monitoring of the effectiveness of the safeguards' key controls, systems, and procedures.
- D. the development and use of reasonable steps to select and retain service providers capable of appropriately safeguarding personal information they receive from respondent, and requiring service providers by contract to implement and maintain appropriate safeguards.
- E. the evaluation and adjustment of respondent's information security program in light of the results of the testing and monitoring required by subpart C, any material changes to respondent's operations or business arrangements, or any

Decision and Order

other circumstances that respondent knows or has reason to know may have a material impact on the effectiveness of its information security program.

III.

IT IS FURTHER ORDERED that, in connection with their compliance with Part II of this order, respondent, and its officers, agents, representatives, and employees, shall obtain initial and biennial assessments and reports (“Assessments”) from a qualified, objective, independent third-party professional, who uses procedures and standards generally accepted in the profession. The reporting period for the Assessments shall cover: (1) the first year after service of the order for the initial Assessment, and (2) each two (2) year period thereafter for twenty (20) years after service of the order for the biennial Assessments. Each Assessment shall:

- A. set forth the specific administrative, technical, and physical safeguards that respondent has implemented and maintained during the reporting period;
- B. explain how such safeguards are appropriate to respondent’s size and complexity, the nature and scope of respondent’s activities, and the sensitivity of the personal information collected from or about consumers;
- C. explain how the safeguards that have been implemented meet or exceed the protections required by the Part II of this order; and
- D. certify that respondent’s security program is operating with sufficient effectiveness to provide reasonable assurance that the security, confidentiality, and integrity of personal information is protected and has so operated throughout the reporting period.

Each Assessment shall be prepared and completed within sixty (60) days after the end of the reporting period to which the Assessment

Decision and Order

applies by a person qualified as a Certified Information System Security Professional (CISSP) or as a Certified Information Systems Auditor (CISA); a person holding Global Information Assurance Certification (GIAC) from the SysAdmin, Audit, Network, Security (SANS) Institute; or a qualified person or organization approved by the Associate Director for Enforcement, Bureau of Consumer Protection, Federal Trade Commission, Washington, D.C. 20580.

Respondent shall provide the initial Assessment to the Associate Director for Enforcement, Bureau of Consumer Protection, Federal Trade Commission, Washington, D.C. 20580, within ten (10) days after the Assessment has been prepared. All subsequent biennial Assessments shall be retained by respondent until the order is terminated and provided to the Associate Director for Enforcement within ten (10) days of request.

IV.

IT IS FURTHER ORDERED that respondent shall maintain and, upon request, make available to the Federal Trade Commission for inspection and copying:

- A. for a period of five (5) years, a print or electronic copy of each document relating to compliance, including, but not limited to, documents, prepared by or on behalf of respondent, that contradict, qualify, or call into question respondent's compliance with this order; and
- B. for a period of three (3) years after the date of preparation of each Assessment required under Part III of this order, all materials relied upon to prepare the Assessment, whether prepared by or on behalf of respondent, including, but not limited to, all plans, reports, studies, reviews, audits, audit trails, policies, training materials, and assessments, and any other materials relating to respondent's compliance with Parts II and III of this order, for the compliance period covered by such Assessment.

Decision and Order

V.

IT IS FURTHER ORDERED that respondent CVS Caremark Corporation shall deliver a copy of this order to all its current and future subsidiaries (including LLCs and each store that is owned, controlled, or operated by respondent or an LLC), current and future principals, officers, directors, and managers, and to all current and future employees, agents, and representatives having responsibilities relating to the subject matter of this order. Respondent shall deliver this order to such current subsidiaries and personnel within sixty (60) days after service of this order, and to such future subsidiaries and personnel within sixty (60) days after the respondent acquires the subsidiary or the person assumes such position or responsibilities.

VI.

IT IS FURTHER ORDERED that respondent shall notify the Commission at least thirty (30) days prior to any change in respondent that may affect compliance obligations arising under this order, including, but not limited to, a dissolution, assignment, sale, merger, or other action that would result in the emergence of a successor company; the creation or dissolution of a subsidiary (including an LLC), parent, or affiliate that engages in any acts or practices subject to this order; the proposed filing of a bankruptcy petition; or a change in respondent's name or address. *Provided, however,* that, with respect to any proposed change in respondent about which respondent learns less than thirty (30) days prior to the date such action is to take place, respondent shall notify the Commission as soon as is practicable after obtaining such knowledge. All notices required by this Part shall be sent by certified mail to the Associate Director, Division of Enforcement, Bureau of Consumer Protection, Federal Trade Commission, Washington, D.C. 20580.

VII.

Decision and Order

IT IS FURTHER ORDERED that respondent shall, within ninety (90) days after service of this order, and at such other times as the Federal Trade Commission may require, file with the Commission a report, in writing, setting forth in detail the manner and form in which it has complied with this order.

VIII.

This order will terminate on June 18, 2029, or twenty (20) years from the most recent date that the United States or the Federal Trade Commission files a complaint (with or without an accompanying consent decree) in federal court alleging any violation of the order, whichever comes later; *provided, however*, that the filing of such a complaint will not affect the duration of:

- A. Any Part in this order that terminates in less than twenty (20) years;
- B. This order's application to any respondent that is not named as a defendant in such complaint; and
- C. This order if such complaint is filed after the order has terminated pursuant to this Part.

Provided, further, that if such complaint is dismissed or a federal court rules that respondent did not violate any provision of the order, and the dismissal or ruling is either not appealed or upheld on appeal, then the order will terminate according to this Part as though the complaint had never been filed, except that the order will not terminate between the date such complaint is filed and the later of the deadline for appealing such dismissal or ruling and the date such dismissal or ruling is upheld on appeal.

By the Commission.

Decision and Order

Exhibit A

Privileged and Highly Confidential

CVS/pharmacy
For Store Entities with Store Count

EntityName	Store Count by Entity	Owner
103rd Avenue CVS, L.L.C.	1	CVS Pharmacy, Inc.
25th Street CVS, Inc.	1	CVS Pharmacy, Inc.
295 Westport Ave. CVS, Inc.	1	CVS Pharmacy, Inc.
37th Minneapolis CVS, L.L.C.	1	CVS Pharmacy, Inc.
54th Western Chicago CVS, L.L.C.	1	CVS Pharmacy, Inc.
59th Ashland CVS, L.L.C.	1	CVS Pharmacy, Inc.
79th Street CVS, L.L.C.	1	CVS Pharmacy, Inc.
87th Avenue CVS, L.L.C.	1	CVS Pharmacy, Inc.
Abington CVS, Inc.	1	CVS Pharmacy, Inc.
Addison Chicago CVS, L.L.C.	1	CVS Pharmacy, Inc.
ADI Realty, Inc.	3	Arbor Drugs, Inc.
Admiral Douglas CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Alabama CVS Pharmacy, L.L.C.	143	CVS Pharmacy, Inc.
Alabama Road CVS, Inc.	1	CVS Pharmacy, Inc.
Albemarle CVS, Inc.	1	CVS Pharmacy, Inc.
Alexandria Duke CVS, Inc.	1	CVS Pharmacy, Inc.
Allentown CVS, Inc.	1	CVS Pharmacy, Inc.
Allentown Village CVS, Inc.	1	CVS Pharmacy, Inc.
Almshouse CVS, Inc.	1	CVS Pharmacy, Inc.
American Drug Stores Delaware, L.L.C.	6	CVS Caremark Corporation
Ames Plaza CVS, Inc.	1	CVS Pharmacy, Inc.
Anderson House CVS, Inc.	1	CVS Pharmacy, Inc.
Angelini Ave. CVS, Inc.	1	CVS Pharmacy, Inc.
Angell Street CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Annapolis Riva CVS, Inc.	1	CVS Pharmacy, Inc.
Aquila Harbor CVS, Inc.	1	CVS Pharmacy, Inc.
Aculdneck Drug CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Aramingo Avenue CVS, Inc.	1	CVS Pharmacy, Inc.
Arbor Drugs - Civic, Inc.	1	Arbor Drugs, Inc.
Arbor Drugs, Inc.	189	CVS Caremark Corporation
Ardmore CVS, Inc.	1	CVS Pharmacy, Inc.
Arizona CVS Stores, L.L.C.	49	CVS RS Arizona, L.L.C.
Arlington 10th Street CVS, Inc.	1	CVS Pharmacy, Inc.
Arlington CVS, Inc.	1	CVS Pharmacy, Inc.
Arlington Pentagon CVS, Inc.	1	CVS Pharmacy, Inc.
Arlington South Eads CVS, Inc.	1	CVS Pharmacy, Inc.
Arlington-Walter Reed CVS, Inc.	1	CVS Pharmacy, Inc.

FEDERAL TRADE COMMISSION DECISIONS
VOLUME 147

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
Armitage CVS, L.L.C.	1	CVS Pharmacy, Inc.
Army Trail Bartlett CVS, L.L.C.	1	CVS Pharmacy, Inc.
Asbury Evanston CVS, L.L.C.	1	CVS Pharmacy, Inc.
Ashburn Parkway CVS, Inc.	1	CVS Pharmacy, Inc.
Ashford Dunwoody CVS, Inc.	1	CVS Pharmacy, Inc.
Aston Township CVS, Inc.	1	CVS Pharmacy, Inc.
Atlanta Brookwood Village CVS, Inc.	1	CVS Pharmacy, Inc.
Atlanta Peachtree CVS, Inc.	1	CVS Pharmacy, Inc.
Atlee CVS, Inc.	1	CVS Pharmacy, Inc.
Atwood Avenue CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Augusta Belair CVS, Inc.	1	CVS Pharmacy, Inc.
Austell Road CVS, Inc.	1	CVS Pharmacy, Inc.
Aversboro Road CVS, Inc.	1	CVS Pharmacy, Inc.
Avon CVS, Inc.	1	CVS Pharmacy, Inc.
Avon OH CVS, Inc.	1	CVS Pharmacy, Inc.
Ballantyne Commons CVS, Inc.	1	CVS Pharmacy, Inc.
Baltimore Belair CVS, Inc.	1	CVS Pharmacy, Inc.
Bangor Route 512 CVS, Inc.	1	CVS Pharmacy, Inc.
Barkley CVS, Inc.	1	CVS Pharmacy, Inc.
Barrington CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Battleground Avenue CVS, L.L.C.	1	CVS IN Distribution, Inc.
Bay Village CVS, Inc.	1	CVS Pharmacy, Inc.
Bedford Retailer, Inc.	1	CVS Pharmacy, Inc.
Bel Air CVS, Inc.	1	CVS Pharmacy, Inc.
Bel Air Maryland CVS, Inc.	1	CVS Pharmacy, Inc.
Bell Plaza CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Bellevue CVS, Inc.	1	CVS Pharmacy, Inc.
Belpre CVS, Inc.	1	CVS Pharmacy, Inc.
Bellsville CVS, Inc.	1	CVS Pharmacy, Inc.
Bennington CVS, Inc.	1	CVS Pharmacy, Inc.
Bensalem CVS, Inc.	1	CVS Pharmacy, Inc.
Berlin CVS, Inc.	1	CVS Pharmacy, Inc.
Benwyn PA CVS, Inc.	1	CVS Pharmacy, Inc.
Bethel CVS, Inc.	1	CVS Pharmacy, Inc.
Bethel Drive CVS, Inc.	1	CVS Pharmacy, Inc.
Bethel OH CVS, L.L.C.	1	Revco Discount Drug Centers, Inc.
Bethlehem Broad St. CVS, Inc.	1	CVS Pharmacy, Inc.

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
Bethlehem West Fourth CVS, Inc.	1	CVS Pharmacy, Inc.
Big B Drugs, Inc.	71	CVS Pharmacy, Inc.
Black Rock Turnpike CVS, Inc.	1	CVS Pharmacy, Inc.
Blaine MN CVS, L.L.C.	1	CVS Pharmacy, Inc.
Blakeslee CVS, Inc.	1	CVS Pharmacy, Inc.
Blue Ridge CVS, L.L.C.	1	CVS VA Distribution, Inc.
Bolingbrook IL CVS, L.L.C.	1	CVS Pharmacy, Inc.
Borough of Hatboro CVS, Inc.	1	CVS Pharmacy, Inc.
Bowling Green CVS, L.L.C.	1	CVS VA Distribution, Inc.
Bowman Street CVS, Inc.	1	CVS Pharmacy, Inc.
Boyetown CVS, Inc.	1	CVS Pharmacy, Inc.
Branhaven CVS, Inc.	1	CVS Pharmacy, Inc.
Bremner Boulevard CVS, Inc.	1	CVS Pharmacy, Inc.
Bridge Street CVS, L.L.C.	1	CVS IN Distribution, Inc.
Bridgeport Boston Ave. CVS, Inc.	1	CVS Pharmacy, Inc.
Bridgeport-Merritt CVS, Inc.	1	CVS Pharmacy, Inc.
Bridgeview CVS, L.L.C.	1	CVS Pharmacy, Inc.
Bristol Bay CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Bristol North Main CVS, Inc.	1	CVS Pharmacy, Inc.
Bristol Plaza CVS, Inc.	1	CVS Pharmacy, Inc.
Brittain Road CVS, Inc.	1	CVS Pharmacy, Inc.
Brittany Square CVS, Inc.	1	CVS Pharmacy, Inc.
Broadheads ville CVS, Inc.	1	CVS Pharmacy, Inc.
Broadway Maricopa CVS, L.L.C.	1	CVS Pharmacy, Inc.
Broadway Minneapolis CVS, L.L.C.	1	CVS Pharmacy, Inc.
Brookfield CVS, Inc.	1	CVS Pharmacy, Inc.
Brookfield IL CVS, L.L.C.	1	CVS Pharmacy, Inc.
Brookhaven Hilltop CVS, Inc.	1	CVS Pharmacy, Inc.
Brooklyn Commons CVS, Inc.	1	CVS Pharmacy, Inc.
Brooklyn Pennsylvania CVS, Inc.	1	CVS Pharmacy, Inc.
Broomall CVS, Inc.	1	CVS Pharmacy, Inc.
Brown Recker CVS, L.L.C.	1	CVS Pharmacy, Inc.
Bryans Road CVS, Inc.	1	CVS of DC and VA, Inc.
Buckeye AZ CVS, L.L.C.	1	CVS Pharmacy, Inc.
Buffalo Grove CVS, L.L.C.	1	CVS Pharmacy, Inc.
Buford Highway CVS, Inc.	1	CVS Pharmacy, Inc.
Bunker Lake CVS, L.L.C.	1	CVS Pharmacy, Inc.

FEDERAL TRADE COMMISSION DECISIONS
VOLUME 147

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
Busse CVS, L.L.C.	1	CVS RX Services, Inc.
Bustleton Nursery CVS, Inc.	1	CVS Pharmacy, Inc.
Camp Hill CVS, Inc.	1	CVS Pharmacy, Inc.
Canal CVS, Inc.	1	CVS Pharmacy, Inc.
Canton GA CVS, Inc.	1	CVS Pharmacy, Inc.
Canton Highway CVS, Inc.	1	CVS Pharmacy, Inc.
Capitol Heights CVS, L.L.C.	1	Bud's Price King, Inc.
Carmey CVS, Inc.	1	CVS Pharmacy, Inc.
Carroll Street CVS, Inc.	1	CVS Pharmacy, Inc.
Castor Avenue CVS, Inc.	1	CVS Pharmacy, Inc.
Cedar Park CVS, Inc.	1	CVS of DC and VA, Inc.
Centreville Road CVS, Inc.	1	CVS Pharmacy, Inc.
Chandler Dobson CVS, L.L.C.	1	CVS Pharmacy, Inc.
Chandler Gilbert CVS, L.L.C.	1	CVS Pharmacy, Inc.
Chandler Kyrene CVS, L.L.C.	1	CVS Pharmacy, Inc.
Chandler Warner CVS, L.L.C.	2	CVS Pharmacy, Inc.
Chanhassen CVS, L.L.C.	1	CVS Pharmacy, Inc.
Charles Street Baltimore CVS, Inc.	1	CVS Pharmacy, Inc.
Charlott Street CVS, Inc.	1	CVS Pharmacy, Inc.
Cheltenham CVS, Inc.	1	CVS Pharmacy, Inc.
Cheshire CVS, Inc.	1	CVS Pharmacy, Inc.
Chester MD CVS, L.L.C.	1	CVS of Maryland, Inc.
Chesterfield CVS, Inc.	1	CVS Pharmacy, Inc.
Chestnut St CVS, Inc.	1	CVS Pharmacy, Inc.
Chicago Heights II CVS, L.L.C.	1	CVS Pharmacy, Inc.
Chicago Pulaski CVS, L.L.C.	1	CVS Pharmacy, Inc.
Chichester CVS, Inc.	1	CVS Pharmacy, Inc.
Chick Springs CVS, Inc.	1	CVS Pharmacy, Inc.
Cincinnati CVS, L.L.C.	1	Revco Discount Drug Centers, Inc.
Cin-Dayton CVS, Inc.	1	CVS Pharmacy, Inc.
Clairmont Road CVS, Inc.	1	CVS Pharmacy, Inc.
Clairton Boulevard CVS, Inc.	1	CVS Pharmacy, Inc.
Clarendon Boulevard CVS, Inc.	1	CVS Pharmacy, Inc.
Clayton CVS, Inc.	1	CVS Pharmacy, Inc.
Cleveland Lorain CVS, Inc.	1	CVS Pharmacy, Inc.
Clinton Post CVS, Inc.	1	CVS Pharmacy, Inc.
Cloppers Mill CVS, Inc.	1	CVS of DC and VA, Inc.

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
Clover CVS, L.L.C.	1	CVS VA Distribution, Inc.
Cochran CVS, L.L.C.	1	CVS VA Distribution, Inc.
Colchester CT CVS, Inc.	1	CVS Pharmacy, Inc.
Collegeville CVS, Inc.	1	CVS Pharmacy, Inc.
Columbus CVS, L.L.C.	1	Revco Discount Drug Centers, Inc.
Columbus High Street CVS, Inc.	1	CVS Pharmacy, Inc.
Columbus Polaris CVS, Inc.	1	CVS Pharmacy, Inc.
Compo Center CVS, Inc.	1	CVS Pharmacy, Inc.
Concord Crisco CVS, Inc.	1	CVS Pharmacy, Inc.
Connecticut Avenue CVS, Inc.	1	CVS Pharmacy, Inc.
Connecticut CVS Pharmacy, L.L.C.	2	CVS Pharmacy, Inc.
Conshohocken CVS, Inc.	1	CVS Pharmacy, Inc.
Constitution Blvd. CVS, Inc.	1	CVS Pharmacy, Inc.
Conyers CVS, Inc.	1	CVS Pharmacy, Inc.
Coon Rapids MN CVS, L.L.C.	1	CVS Pharmacy, Inc.
Coopersburg CVS, Inc.	1	CVS Pharmacy, Inc.
Copley CVS, Inc.	1	CVS Pharmacy, Inc.
Corbin Avenue CVS, Inc.	1	CVS Pharmacy, Inc.
Cornelius CVS, Inc.	1	CVS Pharmacy, Inc.
Cottage Grove CVS, Inc.	1	CVS Pharmacy, Inc.
Courtland Street CVS, Inc.	1	CVS Pharmacy, Inc.
Coventry CT CVS, Inc.	1	CVS Pharmacy, Inc.
Coventry Lake CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Coventry Square CVS, Inc.	1	CVS Pharmacy, Inc.
Covington CVS, Inc.	1	CVS Pharmacy, Inc.
Cox CVS, Inc.	1	CVS Pharmacy, Inc.
Crabapple CVS, Inc.	1	CVS Pharmacy, Inc.
Craig Road CVS, L.L.C.	1	CVS Pharmacy, Inc.
Cranston Retailer, Inc.	1	Cranston-Reservoir CVS, Inc.
Cranston RI CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Cranston-Reservoir CVS, Inc.	1	CVS Pharmacy, Inc.
Cressona Mall CVS, Inc.	1	CVS Pharmacy, Inc.
Crestwood KY CVS, Inc.	1	CVS Pharmacy, Inc.
Crismon Mesa CVS, L.L.C.	1	CVS Pharmacy, Inc.
Crofton MD CVS, L.L.C.	1	CVS of Maryland, Inc.
Cross Keys Place CVS, Inc.	1	CVS Pharmacy, Inc.
Croydon CVS, Inc.	1	CVS Pharmacy, Inc.

FEDERAL TRADE COMMISSION DECISIONS
VOLUME 147

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
Cumberland Bear Hill CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Cumberland Church CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Cumberland Retailer, Inc.	1	Cranston-Reservoir CVS, Inc.
Cumru CVS, Inc.	1	CVS Pharmacy, Inc.
CVS 2874 Clearwater, L.L.C.	1	CVS VA Distribution, Inc.
CVS 2875 Tampa, L.L.C.	1	CVS IN Distribution, Inc.
CVS 28th and Eastern, Inc.	1	CVS Pharmacy, Inc.
CVS 2948 Henderson, L.L.C.	1	CVS Caremark Corporation
CVS 2972 Philadelphia, L.L.C.	1	CVS IN Distribution, Inc.
CVS 2989 Las Vegas, L.L.C.	1	CVS IN Distribution, Inc.
CVS 3284 Phoenix, L.L.C.	1	CVS VA Distribution, Inc.
CVS 3268 Gilbert, L.L.C.	1	CVS RS Arizona, L.L.C.
CVS 3436 Mesa, L.L.C.	1	CVS VA Distribution, Inc.
CVS 3745 Peoria, L.L.C.	1	CVS RS Arizona, L.L.C.
CVS 3755 St. Petersburg, L.L.C.	1	CVS IN Distribution, Inc.
CVS 3766 Dacula, L.L.C.	1	CVS MI Distribution, Inc.
CVS 4083 Largo, L.L.C.	1	CVS IN Distribution, Inc.
CVS 4269 Geneva, L.L.C.	1	CVS VA Distribution, Inc.
CVS 4772 East Vincent, L.L.C.	1	CVS IN Distribution, Inc.
CVS 4994 Miami, L.L.C.	1	CVS VA Distribution, Inc.
CVS 4996 Melbourne, L.L.C.	1	CVS VA Distribution, Inc.
CVS 4999 Suntree, L.L.C.	1	CVS VA Distribution, Inc.
CVS Albany, L.L.C.	323	CVS Pharmacy, Inc.
CVS Alpharetta GA, Inc.	1	CVS Pharmacy, Inc.
CVS Amherst Road, L.L.C.	1	CVS Pharmacy, Inc.
CVS Atlanta GA, Inc.	1	CVS Pharmacy, Inc.
CVS Aurora, L.L.C.	1	CVS Pharmacy, Inc.
CVS Bayberry Bensalem, Inc.	1	CVS Pharmacy, Inc.
CVS BDI, Inc.	83	Hook-SuperRx, L.L.C.
CVS Bellmore Avenue, L.L.C.	1	Melville Realty Company, Inc.
CVS Bensenville, L.L.C.	1	CVS Pharmacy, Inc.
CVS Bethesda Lawrenceville, Inc.	1	CVS Pharmacy, Inc.
CVS Bethesda, L.L.C.	1	Silver Hill CVS, Inc.
CVS Broadway Chicago, L.L.C.	1	CVS Pharmacy, Inc.
CVS Canfield OH, Inc.	1	CVS Pharmacy, Inc.
CVS Carmel Road Charlotte, Inc.	1	CVS Pharmacy, Inc.
CVS Central Charlotte, Inc.	1	CVS Pharmacy, Inc.

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
CVS Clyde Park, Inc.	1	CVS Pharmacy, Inc.
CVS Crystal Derry, L.L.C.	1	CVS Pharmacy, Inc.
CVS Danbury Padanaram, Inc.	1	CVS Pharmacy, Inc.
CVS Dekalb Norristown, Inc.	1	CVS Pharmacy, Inc.
CVS Detroit 8275, L.L.C.	1	CVS MI Distribution, Inc.
CVS Dunkirk Marketplace, L.L.C.	1	Jumpers Hole CVS, Inc.
CVS Durham, Inc.	1	CVS Pharmacy, Inc.
CVS EGL 111th Kansas City MO, Inc.	1	CVS Pharmacy, Inc.
CVS EGL 119th Oklahoma, Inc.	1	CVS Pharmacy, Inc.
CVS EGL 15th Oklahoma City OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL 18th Baseline AZ, L.L.C.	1	CVS Pharmacy, Inc.
CVS EGL 23rd Independence MO, Inc.	1	CVS Pharmacy, Inc.
CVS EGL 23rd Oklahoma, Inc.	1	CVS Pharmacy, Inc.
CVS EGL 25th Gulfport MS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL 37th St Petersburg FL, L.L.C.	1	CVS RX Services, Inc.
CVS EGL 49th Pinellas Park FL, L.L.C.	1	CVS RX Services, Inc.
CVS EGL 4th Chickasha OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL 4th Oklahoma City OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL 6th Winter Haven FL, L.L.C.	1	CVS RX Services, Inc.
CVS EGL 75th Bethany AZ, L.L.C.	1	CVS Pharmacy, Inc.
CVS EGL Atlantic Cocoa Beach FL, L.L.C.	1	CVS RX Services, Inc.
CVS EGL Barry Road MO, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Baseline Tempe AZ, L.L.C.	1	CVS Pharmacy, Inc.
CVS EGL Belt Saint Joseph MO, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Blossom Orlando FL, L.L.C.	1	CVS RX Services, Inc.
CVS EGL Briar Drive KS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Broadmoor MS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Broadway Tempe AZ, L.L.C.	2	CVS Pharmacy, Inc.
CVS EGL Brookside MO, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Camino Boca Raton FL, L.L.C.	1	CVS RX Services, Inc.
CVS EGL Carefree Cave Creek AZ, L.L.C.	1	CVS Pharmacy, Inc.
CVS EGL Chandler Phoenix AZ, L.L.C.	1	CVS Pharmacy, Inc.
CVS EGL Choctaw OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Classen Oklahoma City OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Commerce Ardmore OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL County Line Ridgeland MS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Curry Ford Road FL, L.L.C.	1	CVS RX Services, Inc.

FEDERAL TRADE COMMISSION DECISIONS
VOLUME 147

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
CVS EGL Daytona FL, L.L.C.	1	CVS RX Services, Inc.
CVS EGL Dixie South FL, L.L.C.	1	CVS Pharmacy, Inc.
CVS EGL Dunlap Phoenix AZ, L.L.C.	1	CVS Pharmacy, Inc.
CVS EGL East Camelback AZ, L.L.C.	1	CVS Pharmacy, Inc.
CVS EGL East Danforth OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL East Pass Gulfport MS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Florence Casa AZ, L.L.C.	1	CVS Pharmacy, Inc.
CVS EGL Flowood MS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Forest MS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Fruitville Sarasota FL, L.L.C.	1	CVS RX Services, Inc.
CVS EGL Granada Ormond Beach FL, L.L.C.	1	CVS RX Services, Inc.
CVS EGL Greenwood MS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Hardy Hattiesburg MS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Highland Madison MS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Hwy 152 Mustang OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Hwy 19 Meridian MS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Hwy 19 North FL, L.L.C.	1	CVS RX Services, Inc.
CVS EGL Hwy 24 Independence MO, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Hwy 27 Haines City FL, L.L.C.	1	CVS RX Services, Inc.
CVS EGL Hwy 441 Mount Dora FL, L.L.C.	1	CVS RX Services, Inc.
CVS EGL Hwy 49 Gulfport MS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Independence Shawnee OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Indian Scottsdale AZ, L.L.C.	1	CVS Pharmacy, Inc.
CVS EGL Jackson MS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Johnson Mission KS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Kissimmee FL, L.L.C.	1	CVS RX Services, Inc.
CVS EGL Kosciusko MS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Lakeland FL, L.L.C.	1	CVS RX Services, Inc.
CVS EGL Laurel MS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Leavenworth KS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Lee Lawton OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Lees Summit MO, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Lenexa KS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Liberty MO, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Macarthur OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Magee MS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Main Kansas City MO, Inc.	1	CVS Pharmacy, Inc.

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
CVS EGL Main Norman OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Margate Pompano FL, L.L.C.	1	CVS RX Services, Inc.
CVS EGL Martin Greenville MS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Martin Luther King OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL May Oklahoma, Inc.	1	CVS Pharmacy, Inc.
CVS EGL McComb MS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL McDowell Mesa AZ, L.L.C.	1	CVS Pharmacy, Inc.
CVS EGL McKellips Mesa AZ, L.L.C.	1	CVS Pharmacy, Inc.
CVS EGL Missouri Ave FL, L.L.C.	1	CVS RX Services, Inc.
CVS EGL Moore OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Mur Len Olathe KS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Nail Avenue KS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Natchez MS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Norman OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL North 16th AZ, L.L.C.	1	CVS Pharmacy, Inc.
CVS EGL North Belton MO, Inc.	1	CVS Pharmacy, Inc.
CVS EGL North Cleveland FL, L.L.C.	1	CVS RX Services, Inc.
CVS EGL North Davis MS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL North Federal FL, L.L.C.	1	CVS RX Services, Inc.
CVS EGL North May OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL North Rockwell OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL North Santa Fe OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Oak Kansas City MO, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Oak Traffic Kansas City MO, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Ocean Springs MS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Oklahoma City 44 Southwest, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Olathe KS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Orlando Sanford FL, L.L.C.	1	CVS RX Services, Inc.
CVS EGL Orlando Winter Park FL, L.L.C.	1	CVS RX Services, Inc.
CVS EGL Pascagoula MS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Pearl MS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Picayune MS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Piatte City MO, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Port Southwest FL, L.L.C.	1	CVS Pharmacy, Inc.
CVS EGL Prairie Village KS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Reno Mustang OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Richland MS, Inc.	1	CVS Pharmacy, Inc.

FEDERAL TRADE COMMISSION DECISIONS
VOLUME 147

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
CVS EGL Robinson Norman OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Rockwell Oklahoma City OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Rosemont Goodyear AZ, L.L.C.	1	CVS Pharmacy, Inc.
CVS EGL Santa Edmond OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Scottsdale AZ, L.L.C.	1	CVS Pharmacy, Inc.
CVS EGL Scottsdale Paradise AZ, L.L.C.	1	CVS Pharmacy, Inc.
CVS EGL Shartel Oklahoma, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Shawnee KS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Skyline Tucson AZ, L.L.C.	1	CVS Pharmacy, Inc.
CVS EGL South Bryant OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL South Congress FL, L.L.C.	1	CVS RX Services, Inc.
CVS EGL South East 44th OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Speedway Tucson AZ, L.L.C.	1	CVS Pharmacy, Inc.
CVS EGL State Callahan FL, L.L.C.	1	CVS Pharmacy, Inc.
CVS EGL State Jackson MS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL State Line Kansas City MO, Inc.	1	CVS Pharmacy, Inc.
CVS EGL State Line Road MO, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Stribling Brandon MS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Suncrest Jackson MS, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Tamiami Punta Gorda FL, L.L.C.	1	CVS RX Services, Inc.
CVS EGL Tatum Phoenix AZ, L.L.C.	1	CVS Pharmacy, Inc.
CVS EGL Thunderbird Peoria AZ, L.L.C.	1	CVS Pharmacy, Inc.
CVS EGL Thunderbird Sun City AZ, L.L.C.	1	CVS Pharmacy, Inc.
CVS EGL Union Hills AZ, L.L.C.	1	CVS Pharmacy, Inc.
CVS EGL Val Vista AZ, L.L.C.	1	CVS Pharmacy, Inc.
CVS EGL Vandament Yukon OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Vivion Kansas City MO, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Walsingham Largo FL, L.L.C.	1	CVS RX Services, Inc.
CVS EGL Wemore Tucson AZ, L.L.C.	1	CVS Pharmacy, Inc.
CVS EGL West Britton OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Western Oklahoma City OK, Inc.	1	CVS Pharmacy, Inc.
CVS EGL Woodland De Land FL, L.L.C.	1	CVS RX Services, Inc.
CVS EGL Elliott City MD, L.L.C.	1	Bud's Price King, Inc.
CVS Falls Road MD, L.L.C.	1	Bud's Price King, Inc.
CVS Far Rockaway, L.L.C.	1	CVS Pharmacy, Inc.
CVS Farmington Hills, Inc.	1	CVS Pharmacy, Inc.
CVS Fuller Leonard, Inc.	1	CVS Pharmacy, Inc.

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
CVS Gilbert 3272, L.L.C.	1	CVS RS Arizona, L.L.C.
CVS Gilford, L.L.C.	1	CVS Pharmacy, Inc.
CVS Green Mount, L.L.C.	1	CVS Pharmacy, Inc.
CVS Hartland 8295, L.L.C.	1	CVS MI Distribution, Inc.
CVS Hilliard OH, Inc.	1	CVS Pharmacy, Inc.
CVS Huntersville, Inc.	1	CVS Pharmacy, Inc.
CVS Keene, L.L.C.	1	CVS Pharmacy, Inc.
CVS Laconia, L.L.C.	1	CVS Pharmacy, Inc.
CVS Lake Norwood, Inc.	1	CVS Pharmacy, Inc.
CVS Lansdowne 3142, L.L.C.	1	CVS IN Distribution, Inc.
CVS Mack Drug of New York, L.L.C.	8	CVS Pharmacy, Inc.
CVS MaComb & Mile, Inc.	1	CVS Pharmacy, Inc.
CVS Mammoth Road, L.L.C.	1	CVS Pharmacy, Inc.
CVS Manchester NH, L.L.C.	5	CVS Pharmacy, Inc.
CVS Meriden East Main, Inc.	1	CVS Pharmacy, Inc.
CVS Merrimack Main Street, L.L.C.	1	CVS Pharmacy, Inc.
CVS Midlothian, L.L.C.	1	CVS Pharmacy, Inc.
CVS Morse, Inc.	1	CVS Pharmacy, Inc.
CVS Murrells, Inc.	1	CVS Pharmacy, Inc.
CVS Mystic CT, Inc.	1	CVS Pharmacy, Inc.
CVS Nations Ford Charlotte, Inc.	1	CVS Pharmacy, Inc.
CVS New Baltimore, Inc.	1	CVS Pharmacy, Inc.
CVS North Conway, L.L.C.	1	CVS Pharmacy, Inc.
CVS Odenton, L.L.C.	1	Jumpers Hole CVS, Inc.
CVS of Concord NH, L.L.C.	1	CVS Pharmacy, Inc.
CVS of DC and VA, Inc.	26	CVS Pharmacy, Inc.
CVS of Madison, Conn., Inc.	1	CVS Pharmacy, Inc.
CVS of Maryland, Inc.	79	CVS of DC and VA, Inc.
CVS of North Kingstown, Inc.	1	Cranston-Reservoir CVS, Inc.
CVS of Pennsylvania, Inc.	7	CVS of DC and VA, Inc.
CVS of Rutland, Vermont, Inc.	1	CVS Pharmacy, Inc.
CVS of Stroudsburg, Inc.	1	CVS Pharmacy, Inc.
CVS of Swarthmore, Inc.	1	CVS Pharmacy, Inc.
CVS of Virginia, Inc.	78	CVS of DC and VA, Inc.
CVS of West Virginia, Inc.	3	CVS of DC and VA, Inc.
CVS Orange Avenue, Inc.	1	CVS Pharmacy, Inc.
CVS Peachtree City, Inc.	1	CVS Pharmacy, Inc.

FEDERAL TRADE COMMISSION DECISIONS
VOLUME 147

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
CVS Peachtree Suwanee, Inc.	1	CVS Pharmacy, Inc.
CVS Pharmacy, Inc.	478	CVS Caremark Corporation
CVS Plalstow, L.L.C.	1	CVS Pharmacy, Inc.
CVS Portsmouth Islington, L.L.C.	1	CVS Pharmacy, Inc.
CVS Prescription Center, Inc.	2	CVS of DC and VA, Inc.
CVS Reading PA 3242, L.L.C.	1	CVS IN Distribution, Inc.
CVS Richmond Alee, Inc.	1	CVS Pharmacy, Inc.
CVS Richmond Main, Inc.	1	CVS Pharmacy, Inc.
CVS Royal Ridge, L.L.C.	1	CVS Pharmacy, Inc.
CVS Rt. 199 Williamsburg, Inc.	1	CVS Pharmacy, Inc.
CVS Salem Stateine, L.L.C.	1	CVS Pharmacy, Inc.
CVS Seabrook, L.L.C.	1	CVS Pharmacy, Inc.
CVS Sharon Amity Charlotte, Inc.	1	CVS Pharmacy, Inc.
CVS Skippack, Inc.	1	CVS Pharmacy, Inc.
CVS Solomons MD, L.L.C.	1	Bud's Price King, Inc.
CVS South Canal Chicago, L.L.C.	1	CVS Pharmacy, Inc.
CVS State Capital, L.L.C.	17	CVS Pharmacy, Inc.
CVS Stratford Barnum, Inc.	1	CVS Pharmacy, Inc.
CVS Stratford Nichols, Inc.	1	CVS Pharmacy, Inc.
CVS Stratham, L.L.C.	1	CVS Pharmacy, Inc.
CVS Towson MD, L.L.C.	1	Bud's Price King, Inc.
CVS Trenton MI, L.L.C.	1	CVS MI Distribution, Inc.
CVS Upper Valley Drug, L.L.C.	1	CVS Pharmacy, Inc.
CVS Washington Wisconsin DC, L.L.C.	1	CVS of DC and VA, Inc.
CVS Wisconsin Avenue DC, L.L.C.	1	CVS of DC and VA, Inc.
CVS Wisteria Drive, L.L.C.	1	Jumpers Hole CVS, Inc.
CVS Woodward, Inc.	1	CVS Pharmacy, Inc.
Dallas GA CVS, Inc.	1	CVS Pharmacy, Inc.
Damen Chicago CVS, L.L.C.	1	CVS Pharmacy, Inc.
Danbury Central CVS, Inc.	1	CVS Pharmacy, Inc.
Danbury CVS, Inc.	1	CVS Pharmacy, Inc.
Darien CVS, Inc.	1	CVS Pharmacy, Inc.
Decatur CVS, Inc.	1	CVS Pharmacy, Inc.
Derby Center CVS, Inc.	1	CVS Pharmacy, Inc.
Derry Street CVS, Inc.	1	CVS Pharmacy, Inc.
Desert Buffalo CVS, L.L.C.	1	CVS Pharmacy, Inc.
Desert Eastern CVS, L.L.C.	1	CVS Pharmacy, Inc.

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rc Store Entities with Store Count

EntityName	Store Count by Entity	Owner
Desert Inn CVS, L.L.C.	1	CVS Pharmacy, Inc.
Detroit Greenfield CVS, Inc.	1	CVS Pharmacy, Inc.
Dexter Plaza CVS, Inc.	1	CVS Pharmacy, Inc.
District of Columbia CVS Pharmacy, L.L.C.	2	CVS Pharmacy, Inc.
Division CVS, L.L.C.	1	CVS Pharmacy, Inc.
Downers Grove CVS, L.L.C.	1	CVS Pharmacy, Inc.
Downingtown CVS, Inc.	1	CVS Pharmacy, Inc.
Drexel Hill CVS, Inc.	1	CVS Pharmacy, Inc.
Duke Street CVS, Inc.	1	CVS Pharmacy, Inc.
Duluth CVS, Inc.	1	CVS Pharmacy, Inc.
Duncan SC CVS, Inc.	1	CVS Pharmacy, Inc.
Dundee Elgin CVS, L.L.C.	1	CVS Pharmacy, Inc.
Dunlap Phoenix CVS, L.L.C.	1	CVS Pharmacy, Inc.
Dunlop Farms CVS, Inc.	1	CVS Pharmacy, Inc.
Eagan MN CVS, L.L.C.	1	CVS Pharmacy, Inc.
Eagle Valley CVS, Inc.	1	CVS Pharmacy, Inc.
East Avenue CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
East Bradford Plaza CVS, Inc.	1	CVS Pharmacy, Inc.
East Greenwich CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
East Hartford CVS, Inc.	1	CVS Pharmacy, Inc.
East Hartford-Main Street CVS, Inc.	1	CVS Pharmacy, Inc.
East Haven Main Street CVS, Inc.	1	CVS Pharmacy, Inc.
East Main Bridgeport CVS, Inc.	1	CVS Pharmacy, Inc.
East Providence CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
East Putnam Avenue CVS, Inc.	1	CVS Pharmacy, Inc.
East Side CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Easton Ave. CVS, Inc.	1	CVS Pharmacy, Inc.
Easton Maryland CVS, Inc.	1	CVS Pharmacy, Inc.
Easton Nazareth CVS, Inc.	1	CVS Pharmacy, Inc.
Easton Washington Street CVS, Inc.	1	CVS Pharmacy, Inc.
Edgewater CVS, Inc.	1	CVS Pharmacy, Inc.
Eleventh Street CVS, Inc.	1	CVS Pharmacy, Inc.
Elgin CVS, L.L.C.	1	CVS Pharmacy, Inc.
Elliot Tempe CVS, L.L.C.	1	CVS Pharmacy, Inc.
Elmwood City CVS, L.L.C.	1	CVS IN Distribution, Inc.
Elmhurst CVS, L.L.C.	1	CVS Pharmacy, Inc.
Emmaus Avenue CVS, Inc.	1	CVS Pharmacy, Inc.

FEDERAL TRADE COMMISSION DECISIONS
VOLUME 147

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
Emmaus, Pennsylvania, CVS, Inc.	1	CVS Pharmacy, Inc.
Enfield Elm CVS, Inc.	1	CVS Pharmacy, Inc.
Enfield Phoenix CVS, Inc.	1	CVS Pharmacy, Inc.
Engleside Plaza CVS, Inc.	1	CVS of DC and VA, Inc.
Erdenheim Saints CVS, Inc.	1	CVS Pharmacy, Inc.
Erie CVS, Inc.	1	CVS Pharmacy, Inc.
Essex Eastern CVS, Inc.	1	CVS Pharmacy, Inc.
Essex Martin CVS, Inc.	1	CVS Pharmacy, Inc.
Evanston IL CVS, L.L.C.	1	CVS Pharmacy, Inc.
Evergreen City CVS, L.L.C.	1	CVS Pharmacy, Inc.
Fairfax CVS, Inc.	1	CVS of DC and VA, Inc.
Fairfax Main Street CVS, Inc.	1	CVS Pharmacy, Inc.
Fairfax Route 29 CVS, Inc.	1	CVS Pharmacy, Inc.
Fairfield Plaza CVS, Inc.	1	CVS Pharmacy, Inc.
Fairfield Rt. 1 CVS, Inc.	1	CVS Pharmacy, Inc.
Fairlane Village Mall CVS, Inc.	1	CVS Pharmacy, Inc.
Falls Church CVS, Inc.	1	CVS Pharmacy, Inc.
Farmington Ave. CVS, Inc.	1	CVS Pharmacy, Inc.
Farmington Plaza CVS, Inc.	1	CVS Pharmacy, Inc.
Feasterville CVS, Inc.	1	CVS Pharmacy, Inc.
Fleming Road CVS, L.L.C.	1	CVS Pharmacy, Inc.
Flatwoods CVS, Inc.	1	CVS Pharmacy, Inc.
Florence CVS, Inc.	1	CVS Pharmacy, Inc.
Folsom CVS, Inc.	1	CVS Pharmacy, Inc.
Forbes Avenue CVS, Inc.	1	CVS Pharmacy, Inc.
Forest Drive CVS, Inc.	1	CVS Pharmacy, Inc.
Forest Hill MD CVS, L.L.C.	1	CVS of Maryland, Inc.
Forest Hills CVS, Inc.	1	CVS of DC and VA, Inc.
Forest Park CVS, Inc.	1	CVS Pharmacy, Inc.
Forks Township CVS, Inc.	1	CVS Pharmacy, Inc.
Fort Foote CVS, Inc.	1	CVS Pharmacy, Inc.
Foster Negle CVS, L.L.C.	2	CVS Pharmacy, Inc.
Foxon East Haven CVS, Inc.	1	CVS Pharmacy, Inc.
Franconia Road CVS, Inc.	1	CVS Pharmacy, Inc.
Frankfort CVS, Inc.	1	CVS Pharmacy, Inc.
Franklin Avenue CVS, Inc.	1	CVS Pharmacy, Inc.
Franklin TN CVS, Inc.	1	CVS Pharmacy, Inc.

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
Frederick CVS, Inc.	1	CVS Pharmacy, Inc.
Gahanna OH CVS, Inc.	1	CVS Pharmacy, Inc.
Garden City CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Garfield Beach CVS, L.L.C.	374	CVS Pharmacy, Inc.
Georgetown OH CVS, L.L.C.	1	Revco Discount Drug Centers, Inc.
Georgia CVS Pharmacy, L.L.C.	24	CVS Pharmacy, Inc.
German Dobson CVS, L.L.C.	14	CVS Pharmacy, Inc.
Germanstown Avenue CVS, Inc.	1	CVS Pharmacy, Inc.
Germanstown MD CVS, L.L.C.	1	Bud's Price King, Inc.
Gilbertsville CVS, Inc.	1	CVS Pharmacy, Inc.
Glastonbury CVS, Inc.	1	CVS Pharmacy, Inc.
Glebe Road CVS, Inc.	1	CVS of DC and VA, Inc.
Glen Allen CVS, Inc.	1	CVS Pharmacy, Inc.
Glen Burnie MD CVS, L.L.C.	1	CVS of Maryland, Inc.
Godfrey Avenue CVS, Inc.	1	CVS Pharmacy, Inc.
Godshall Franconia CVS, Inc.	1	CVS Pharmacy, Inc.
Goodwin Park CVS, Inc.	1	CVS Pharmacy, Inc.
Goodyear CVS, L.L.C.	1	CVS RX Services, Inc.
Goshen Village CVS, Inc.	1	CVS Pharmacy, Inc.
Graham Charlotte CVS, Inc.	1	CVS Pharmacy, Inc.
Granby CVS, Inc.	1	CVS Pharmacy, Inc.
Grand Schaefer CVS, Inc.	1	CVS Pharmacy, Inc.
Grand St. Paul CVS, L.L.C.	13	CVS Pharmacy, Inc.
Granite Street CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Gratiot CVS, Inc.	1	CVS Pharmacy, Inc.
Gray's Southgate, Inc.	1	CVS of DC and VA, Inc.
Greenbelt CVS, Inc.	1	CVS Pharmacy, Inc.
Greenbelt-Cherrywood CVS, Inc.	1	CVS Pharmacy, Inc.
Greensboro GA CVS, Inc.	1	CVS Pharmacy, Inc.
Greenville CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Greenwich 99 CVS, Inc.	1	CVS Pharmacy, Inc.
Grove City CVS, Inc.	1	CVS Pharmacy, Inc.
Guilford CVS, Inc.	1	CVS Pharmacy, Inc.
Gwinnett CVS, Inc.	1	CVS Pharmacy, Inc.
Hamden Plaza CVS, Inc.	1	CVS Pharmacy, Inc.
Hamilton CVS, L.L.C.	1	Revco Discount Drug Centers, Inc.
Hamlin CVS, Inc.	1	CVS Pharmacy, Inc.

FEDERAL TRADE COMMISSION DECISIONS
VOLUME 147

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
Hanover CVS, L.L.C.	1	CVS Pharmacy, Inc.
Hard Columbus CVS, L.L.C.	1	Revco Discount Drug Centers, Inc.
Hardscrabble CVS, Inc.	1	CVS Pharmacy, Inc.
Harmon Las Vegas CVS, L.L.C.	1	CVS Pharmacy, Inc.
Harrisburg CVS, Inc.	1	CVS Pharmacy, Inc.
Harrisburg NC CVS, Inc.	1	CVS Pharmacy, Inc.
Harrison Bridge Road CVS, Inc.	1	CVS Pharmacy, Inc.
Hartford Blue Hills CVS, Inc.	1	CVS Pharmacy, Inc.
Hartford Main Street CVS, Inc.	1	CVS Pharmacy, Inc.
Haverford and City Line CVS, Inc.	1	CVS Pharmacy, Inc.
Haverford Avenue CVS, Inc.	1	CVS Pharmacy, Inc.
Havertown CVS, Inc.	1	CVS Pharmacy, Inc.
Haw Creek Circle CVS, Inc.	1	CVS Pharmacy, Inc.
Hawley CVS, Inc.	1	CVS Pharmacy, Inc.
Hazleton Plaza CVS Inc.	1	CVS Pharmacy, Inc.
Hellertown CVS, Inc.	1	CVS Pharmacy, Inc.
Henderson CVS, L.L.C.	1	CVS Pharmacy, Inc.
Henderson Horizon CVS, L.L.C.	1	CVS Pharmacy, Inc.
Henderson Road CVS, Inc.	1	CVS Pharmacy, Inc.
Henry Philadelphia CVS, Inc.	1	CVS Pharmacy, Inc.
Henrydale CVS, Inc.	1	CVS Pharmacy, Inc.
Hick Hwy CVS, Inc.	1	CVS Pharmacy, Inc.
Hickory CVS, Inc.	1	CVS Pharmacy, Inc.
High House Road CVS, Inc.	1	CVS Pharmacy, Inc.
Highland Center CVS, Inc.	1	CVS Pharmacy, Inc.
Highland Cheshire CVS, Inc.	1	CVS Pharmacy, Inc.
Highland Park CVS, L.L.C.	89	CVS Pharmacy, Inc.
Highway 17 Mt. Pleasant CVS, Inc.	1	CVS Pharmacy, Inc.
Highway Charlotte CVS, Inc.	1	CVS Pharmacy, Inc.
Highway Stockbridge CVS, Inc.	1	CVS Pharmacy, Inc.
Hilliard Darby CVS, Inc.	1	CVS Pharmacy, Inc.
Hillsboro Road CVS, L.L.C.	1	CVS MI Distribution, Inc.
Hillside II CVS, L.L.C.	1	CVS Pharmacy, Inc.
Holcomb CVS, Inc.	1	CVS Pharmacy, Inc.
Holiday CVS, L.L.C.	623	CVS Pharmacy, Inc.
Holly Springs CVS, Inc.	1	CVS Pharmacy, Inc.
Hook-SupeRx, L.L.C.	601	CVS Pharmacy, Inc.

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
Hope Mills CVS, Inc.	1	CVS Pharmacy, Inc.
Hopewell CVS, Inc.	1	CVS Pharmacy, Inc.
Horsham CVS, Inc.	1	CVS Pharmacy, Inc.
Howell CVS, L.L.C.	1	CVS MI Distribution, Inc.
Hudson N.H. CVS, Inc.	1	CVS Pharmacy, Inc.
Hunting Park CVS, Inc.	1	CVS Pharmacy, Inc.
Huntingdon Valley CVS, Inc.	1	CVS Pharmacy, Inc.
Hurley MS CVS, Inc.	1	CVS Pharmacy, Inc.
Hurricane WV CVS, Inc.	1	CVS Pharmacy, Inc.
Hyattsville CVS, Inc.	1	CVS Pharmacy, Inc.
Indian 59th Phoenix CVS, L.L.C.	1	CVS Pharmacy, Inc.
Indian School Phoenix CVS, L.L.C.	1	CVS Pharmacy, Inc.
Iowa CVS Pharmacy, L.L.C.	10	CVS Pharmacy, Inc.
Irving Park CVS, L.L.C.	1	CVS Pharmacy, Inc.
Irving Street CVS, Inc.	1	CVS Pharmacy, Inc.
Jackson North West CVS, Inc.	1	CVS Pharmacy, Inc.
Jefferson CVS, Inc.	1	CVS Pharmacy, Inc.
Jenkintown CVS, Inc.	1	CVS Pharmacy, Inc.
Jennersville CVS, Inc.	1	CVS Pharmacy, Inc.
Jersey Shore PA CVS, Inc.	1	CVS Pharmacy, Inc.
Johnston Centre CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Joliet CVS, L.L.C.	1	CVS Pharmacy, Inc.
Jones Hill CVS, Inc.	1	CVS Pharmacy, Inc.
Jonesboro CVS, Inc.	1	CVS Pharmacy, Inc.
K Street CVS, Inc.	1	CVS of DC and VA, Inc.
Kankakee IL CVS, L.L.C.	1	CVS Pharmacy, Inc.
Kansas CVS Pharmacy, L.L.C.	19	CVS Pharmacy, Inc.
Kennesaw CVS, Inc.	1	CVS Pharmacy, Inc.
Kennesaw Due West CVS, Inc.	1	CVS Pharmacy, Inc.
Kennett Square CVS, Inc.	1	CVS Pharmacy, Inc.
Kensington CVS, Inc.	1	CVS Pharmacy, Inc.
Kentucky CVS Pharmacy, L.L.C.	1	CVS Pharmacy, Inc.
Kentwood CVS, Inc.	1	CVS Pharmacy, Inc.
Keyser CVS, L.L.C.	1	CVS VA Distribution, Inc.
King Street CVS, Inc.	1	CVS Pharmacy, Inc.
Kingston Market CVS, Inc.	1	CVS Pharmacy, Inc.
Kingston Road CVS, Inc.	1	Cranston-Reservoir CVS, Inc.

FEDERAL TRADE COMMISSION DECISIONS
VOLUME 147

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
Knox Abbott Road CVS, Inc.	1	CVS Pharmacy, Inc.
Knoxville Emory CVS, Inc.	1	CVS Pharmacy, Inc.
Krocks Road CVS, Inc.	1	CVS Pharmacy, Inc.
L Street CVS, Inc.	1	CVS Pharmacy, Inc.
Lahser CVS, Inc.	1	CVS Pharmacy, Inc.
Lake Danbury CVS, Inc.	1	CVS Pharmacy, Inc.
Lake Forest CVS, L.L.C.	1	CVS Pharmacy, Inc.
Lake Mead Las Vegas CVS, L.L.C.	1	CVS Pharmacy, Inc.
Lake Pleasant Peoria CVS, L.L.C.	1	CVS Pharmacy, Inc.
Lancaster CVS, Inc.	1	CVS Pharmacy, Inc.
Landisville CVS, Inc.	1	CVS Pharmacy, Inc.
Lansdowne Avenue CVS, Inc.	1	CVS Pharmacy, Inc.
Lansing CVS, Inc.	1	CVS Pharmacy, Inc.
Las Vegas NV CVS, L.L.C.	1	CVS Pharmacy, Inc.
Laurel MD CVS, L.L.C.	1	CVS of Maryland, Inc.
Laurens Road CVS, Inc.	1	CVS Pharmacy, Inc.
Lavista Road CVS, Inc.	1	CVS Pharmacy, Inc.
Lawrence Chicago CVS, L.L.C.	1	CVS Pharmacy, Inc.
Lawrenceville CVS, Inc.	1	CVS Pharmacy, Inc.
Lee Highway CVS, Inc.	1	CVS of DC and VA, Inc.
Lehigh Street CVS, Inc.	1	CVS Pharmacy, Inc.
Lemont CVS, L.L.C.	1	CVS Pharmacy, Inc.
Levittown PA CVS, Inc.	1	CVS Pharmacy, Inc.
Liberty Park CVS, Inc.	1	CVS Pharmacy, Inc.
Liberty Road CVS, Inc.	1	CVS Pharmacy, Inc.
Library Road CVS, Inc.	1	CVS Pharmacy, Inc.
Lilburn CVS, Inc.	1	CVS Pharmacy, Inc.
Lilburn Harmony Grove CVS, Inc.	1	CVS Pharmacy, Inc.
Lima PA CVS, Inc.	1	CVS Pharmacy, Inc.
Limerick CVS, Inc.	1	CVS Pharmacy, Inc.
Lincoln Drive (Phil) CVS, Inc.	1	CVS Pharmacy, Inc.
Lindbergh CVS, Inc.	1	CVS Pharmacy, Inc.
Lionville CVS, Inc.	1	CVS Pharmacy, Inc.
Litchfield Park CVS, L.L.C.	1	CVS Pharmacy, Inc.
Litchfield Rt. 202 CVS, Inc.	1	CVS Pharmacy, Inc.
Lockport CVS, L.L.C.	1	CVS Pharmacy, Inc.
Locust Philadelphia CVS, Inc.	1	CVS Pharmacy, Inc.

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
Loehmann's Plaza CVS, Inc.	1	CVS Pharmacy, Inc.
Lombard CVS, L.L.C.	1	CVS Pharmacy, Inc.
Lombard-Light Streets CVS, Inc.	1	CVS Pharmacy, Inc.
Lone Oak KY CVS, Inc.	1	CVS Pharmacy, Inc.
Long Hill Road CVS, Inc.	1	CVS Pharmacy, Inc.
Long Shoals Road CVS, Inc.	1	CVS Pharmacy, Inc.
Louisiana CVS Pharmacy, L.L.C.	86	CVS Pharmacy, Inc.
Louisville CVS, Inc.	1	CVS Pharmacy, Inc.
Lower Makefield CVS, Inc.	1	CVS Pharmacy, Inc.
M Street CVS, Inc.	1	CVS of DC and VA, Inc.
Mableton Parkway CVS, Inc.	1	CVS Pharmacy, Inc.
MacArthur Boulevard CVS, Inc.	1	CVS Pharmacy, Inc.
Madison Chicago CVS, L.L.C.	1	CVS Pharmacy, Inc.
Main Annapolis CVS, L.L.C.	1	CVS of Maryland, Inc.
Main Devon Bartlett CVS, L.L.C.	1	CVS Pharmacy, Inc.
Main Montgomery CVS, L.L.C.	1	CVS VA Distribution, Inc.
Manassas CVS, Inc.	1	CVS Pharmacy, Inc.
Manchester North Main CVS, Inc.	1	CVS Pharmacy, Inc.
Mansfield Shopping Center CVS, Inc.	1	CVS Pharmacy, Inc.
Manton Avenue CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Maple Glen CVS, Inc.	1	CVS Pharmacy, Inc.
Maple Grove MN CVS, L.L.C.	1	CVS Pharmacy, Inc.
Marietta CVS, Inc.	1	CVS Pharmacy, Inc.
Market Street CVS, Inc.	1	CVS Pharmacy, Inc.
Maryland CVS Pharmacy, L.L.C.	2	CVS Pharmacy, Inc.
Maryland Parkway CVS, L.L.C.	1	CVS Pharmacy, Inc.
Maryland St. Paul CVS, L.L.C.	1	CVS Pharmacy, Inc.
Mason CVS, Inc.	1	CVS Pharmacy, Inc.
Massachusetts Avenue CVS, L.L.C.	1	CVS of DC and VA, Inc.
Massachusetts CVS Pharmacy, L.L.C.	301	CVS Pharmacy, Inc.
Mayfield CVS, Inc.	1	CVS Pharmacy, Inc.
McNair Farms CVS, Inc.	1	CVS Pharmacy, Inc.
Meadowbrook Newark CVS, Inc.	1	CVS Pharmacy, Inc.
Media CVS, Inc.	1	CVS Pharmacy, Inc.
Merchant Plaza CVS, Inc.	1	CVS Pharmacy, Inc.
Meridan West Main CVS, Inc.	1	CVS Pharmacy, Inc.
Meriden Parkade CVS, Inc.	1	CVS Pharmacy, Inc.

FEDERAL TRADE COMMISSION DECISIONS
VOLUME 147

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
Meriden Road CVS, Inc.	1	CVS Pharmacy, Inc.
Meriden Drug CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Mesa Brown CVS, L.L.C.	1	CVS Pharmacy, Inc.
Michigan Chicago CVS, L.L.C.	1	CVS Pharmacy, Inc.
Middle River CVS, Inc.	1	CVS Pharmacy, Inc.
Middle Smithfield Township CVS, Inc.	1	CVS Pharmacy, Inc.
Middletown CVS, Inc.	1	CVS Pharmacy, Inc.
Middletown Township CVS, Inc.	1	CVS Pharmacy, Inc.
Milford Broad St. CVS, Inc.	1	CVS Pharmacy, Inc.
Millbourne CVS, Inc.	1	CVS Pharmacy, Inc.
Milwaukee Chicago CVS, L.L.C.	1	CVS Pharmacy, Inc.
Mineral Spring Ave. CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Minnesota CVS Pharmacy, L.L.C.	1	CVS MN Holding Company, L.L.C.
Mint Hill CVS, Inc.	1	CVS Pharmacy, Inc.
Mississippi CVS Pharmacy, L.L.C.	3	CVS Pharmacy, Inc.
Missouri CVS Pharmacy, L.L.C.	30	CVS Pharmacy, Inc.
Mogadore CVS, Inc.	1	CVS Pharmacy, Inc.
Mokena CVS, L.L.C.	1	CVS Pharmacy, Inc.
Monroe CVS, Inc.	1	CVS Pharmacy, Inc.
Montana CVS Pharmacy, L.L.C.	8	CVS Caremark Corporation
Montrose Chicago CVS, L.L.C.	1	CVS Pharmacy, Inc.
Morrisville CVS, Inc.	1	CVS Pharmacy, Inc.
Morrow CVS, Inc.	1	CVS Pharmacy, Inc.
Mounds View MN CVS, L.L.C.	1	CVS Pharmacy, Inc.
Mount Carmel Plaza CVS, Inc.	1	CVS Pharmacy, Inc.
Mountain Avenue CVS, Inc.	1	CVS Pharmacy, Inc.
Mt. Joy CVS, Inc.	1	CVS Pharmacy, Inc.
Mt. Morris CVS, Inc.	1	CVS Pharmacy, Inc.
Mt. Pleasant CVS, Inc.	1	CVS Pharmacy, Inc.
Mundelein CVS, L.L.C.	1	CVS Pharmacy, Inc.
Murray CVS, Inc.	1	CVS Pharmacy, Inc.
Nashville CVS, L.L.C.	1	CVS IN Distribution, Inc.
Naugatuck Bridge St. CVS, Inc.	1	CVS Pharmacy, Inc.
Nebraska CVS Pharmacy, L.L.C.	4	CVS Pharmacy, Inc.
NEC Main CVS, Inc.	1	CVS Pharmacy, Inc.
NEC Montgomery CVS, L.L.C.	1	CVS Pharmacy, Inc.
Nevada CVS Pharmacy, L.L.C.	38	CVS NV Holding Company, L.L.C.

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
New Britain CVS, Inc.	1	CVS Pharmacy, Inc.
New Britain Township CVS, Inc.	1	CVS Pharmacy, Inc.
New Haven Crown CVS, Inc.	1	CVS Pharmacy, Inc.
New Hope MN CVS, L.L.C.	1	CVS Pharmacy, Inc.
New Jersey Avenue CVS, L.L.C.	1	CVS of DC and VA, Inc.
New Jersey CVS Pharmacy, L.L.C.	224	CVS Pharmacy, Inc.
New Lenox CVS, L.L.C.	1	CVS Pharmacy, Inc.
New London Ocean Avenue CVS, Inc.	1	CVS Pharmacy, Inc.
New London Turnpike CVS, Inc.	1	CVS Pharmacy, Inc.
Newark East Main CVS, Inc.	1	CVS Pharmacy, Inc.
Newington Cedar CVS, Inc.	1	CVS Pharmacy, Inc.
Newman CVS, Inc.	1	CVS Pharmacy, Inc.
Newport CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Newtown CVS, Inc.	1	CVS Pharmacy, Inc.
Niles CVS, Inc.	1	CVS Pharmacy, Inc.
Niles CVS, L.L.C.	1	CVS Pharmacy, Inc.
Norristown CVS, Inc.	1	CVS Pharmacy, Inc.
North Carolina Acquisition Corp.	1	CVS Pharmacy, Inc.
North Carolina CVS Pharmacy, L.L.C.	18	CVS Pharmacy, Inc.
North Charleston SC CVS, Inc.	1	CVS Pharmacy, Inc.
North Grace Lombard CVS, L.L.C.	1	CVS Pharmacy, Inc.
North Haven CVS, Inc.	1	CVS Pharmacy, Inc.
North Las Vegas CVS, L.L.C.	1	CVS Pharmacy, Inc.
North Olmstead OH CVS, Inc.	1	CVS Pharmacy, Inc.
Northwest K Street CVS, Inc.	1	CVS Pharmacy, Inc.
Northwest M Street CVS, L.L.C.	1	CVS of DC and VA, Inc.
Norwalk Broad Street CVS, Inc.	1	CVS Pharmacy, Inc.
Norwich Main Street CVS, Inc.	1	CVS Pharmacy, Inc.
Notre Dame CVS, Inc.	1	CVS Pharmacy, Inc.
Oak Lane CVS, Inc.	1	CVS Pharmacy, Inc.
Oak Ridge NC CVS, Inc.	1	CVS Pharmacy, Inc.
Oakwood CVS, Inc.	1	CVS Pharmacy, Inc.
Ocean City MD CVS, L.L.C.	1	CVS of Maryland, Inc.
Ohio CVS Stores, L.L.C.	6	CVS Pharmacy, Inc.
Oklahoma CVS Pharmacy, L.L.C.	2	CVS Pharmacy, Inc.
Old Buncombe Road CVS, Inc.	1	CVS Pharmacy, Inc.
Old Greenwich CVS, Inc.	1	CVS Pharmacy, Inc.

FEDERAL TRADE COMMISSION DECISIONS
VOLUME 147

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
Old Hickory CVS, Inc.	1	CVS Pharmacy, Inc.
Old National CVS, Inc.	1	CVS Pharmacy, Inc.
Old Saybrook CVS, Inc.	1	CVS Pharmacy, Inc.
Orange CVS, Inc.	1	CVS Pharmacy, Inc.
Oregon Avenue CVS, Inc.	1	CVS Pharmacy, Inc.
P Street CVS, Inc.	1	CVS Pharmacy, Inc.
PA CVS, Inc.	1	CVS Pharmacy, Inc.
Paoli, PA, CVS, Inc.	1	CVS Pharmacy, Inc.
Paria CVS, Inc.	1	CVS Pharmacy, Inc.
Park Street CVS, Inc.	1	CVS Pharmacy, Inc.
Parkwood Circle CVS, Inc.	1	CVS Pharmacy, Inc.
Parsonage CVS, Inc.	1	CVS Pharmacy, Inc.
Pataskala CVS, L.L.C.	1	Revco Discount Drug Centers, Inc.
Pawtucket CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Pawtucket Plaza CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Paxton Square CVS, Inc.	1	CVS Pharmacy, Inc.
Pecos Gilbert CVS, L.L.C.	1	CVS Pharmacy, Inc.
Penn - Daw CVS, Inc.	1	CVS of DC and VA, Inc.
Pennsauken CVS, Inc.	1	CVS Pharmacy, Inc.
Pennsylvania Ave. CVS, Inc.	1	CVS of DC and VA, Inc.
Pennsylvania Avenue CVS, Inc.	1	CVS Pharmacy, Inc.
Pennsylvania CVS Pharmacy, L.L.C.	20	CVS Pharmacy, Inc.
Peoria AZ CVS, L.L.C.	1	CVS Pharmacy, Inc.
Perry Highway CVS, Inc.	1	CVS Pharmacy, Inc.
Pershing Drive CVS, Inc.	1	CVS Pharmacy, Inc.
Phila Sun CVS, Inc.	1	CVS Pharmacy, Inc.
Philadelphia Broad CVS, Inc.	1	CVS Pharmacy, Inc.
Philadelphia Foxchase CVS, Inc.	1	CVS Pharmacy, Inc.
Philadelphia Frankford CVS, Inc.	1	CVS Pharmacy, Inc.
Philadelphia Harbison CVS, Inc.	1	CVS Pharmacy, Inc.
Philadelphia PA CVS, Inc.	1	CVS Pharmacy, Inc.
Philadelphia South Street CVS, Inc.	1	CVS Pharmacy, Inc.
Philly Broad Street CVS, Inc.	1	CVS Pharmacy, Inc.
Pigeon Forge TN CVS, Inc.	1	CVS Pharmacy, Inc.
Pinal County AZ CVS, L.L.C.	1	CVS Pharmacy, Inc.
Pio Nono Avenue CVS, Inc.	1	CVS Pharmacy, Inc.
Piper Glen CVS, Inc.	1	CVS Pharmacy, Inc.

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
Pittston CVS, Inc.	1	CVS Pharmacy, Inc.
Plainfield CVS, Inc.	1	CVS Pharmacy, Inc.
Plainfield IL CVS, L.L.C.	1	CVS Pharmacy, Inc.
Plainville East CVS, Inc.	1	CVS Pharmacy, Inc.
Plymouth MN CVS, L.L.C.	1	CVS Pharmacy, Inc.
Port Huron CVS, Inc.	1	CVS Pharmacy, Inc.
Porters Pass CVS, Inc.	1	CVS Pharmacy, Inc.
Portsmouth CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Post Office Square CVS, Inc.	1	CVS Pharmacy, Inc.
Pottstown High Street CVS, Inc.	1	CVS Pharmacy, Inc.
Powell OH CVS, Inc.	1	CVS Pharmacy, Inc.
Prospect CVS, Inc.	1	CVS Pharmacy, Inc.
Prospect Park CVS, Inc.	1	CVS Pharmacy, Inc.
Providence Charlotte CVS, Inc.	1	CVS Pharmacy, Inc.
Providence Road CVS, Inc.	1	CVS Pharmacy, Inc.
Putnam Pike CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Quakertown CVS, Inc.	1	CVS Pharmacy, Inc.
Queen Anne Plaza CVS, Inc.	1	CVS Pharmacy, Inc.
Quention Road CVS, Inc.	1	CVS Pharmacy, Inc.
Race Street CVS, Inc.	1	CVS Pharmacy, Inc.
Raleigh CVS, Inc.	1	CVS Pharmacy, Inc.
Raleigh Millbrook CVS, Inc.	1	CVS Pharmacy, Inc.
Ralph's Corner CVS, Inc.	1	CVS Pharmacy, Inc.
Ray McClintock CVS, L.L.C.	1	CVS Pharmacy, Inc.
Rea & Derick, Inc.	67	CVS of DC and VA, Inc.
Reading, Penna., CVS, Inc.	1	CVS Pharmacy, Inc.
Recker Mesa CVS, L.L.C.	1	CVS Pharmacy, Inc.
Reed Street CVS, Inc.	1	CVS Pharmacy, Inc.
Rehoboth Beach CVS, Inc.	1	CVS Pharmacy, Inc.
Reidville Drive CVS, Inc.	1	CVS Pharmacy, Inc.
Reston Plaza America CVS, Inc.	1	CVS Pharmacy, Inc.
Revco Discount Drug Centers, Inc.	895	CVS Caremark Corporation
Revco Drug Stores, Inc.	5	Revco Discount Drug Centers, Inc.
Reynoldsburg CVS, Inc.	1	CVS Pharmacy, Inc.
Rhode Island CVS Pharmacy, L.L.C.	2	CVS Pharmacy, Inc.
Richboro Market CVS, Inc.	1	CVS Pharmacy, Inc.
Richmond CVS, Inc.	1	CVS Pharmacy, Inc.

FEDERAL TRADE COMMISSION DECISIONS
VOLUME 147

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
Richmond Highway CVS, Inc.	1	CVS Pharmacy, Inc.
Richmond RI CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Richmond Woodman CVS, Inc.	1	CVS Pharmacy, Inc.
Ridgefield Grove CVS, Inc.	1	CVS Pharmacy, Inc.
Ridley Acres CVS, Inc.	1	CVS Pharmacy, Inc.
Ridley CVS, Inc.	1	CVS Pharmacy, Inc.
Rising Sun CVS, Inc.	1	CVS Pharmacy, Inc.
River Forest CVS, L.L.C.	1	CVS Pharmacy, Inc.
Riverdale IL CVS, L.L.C.	1	CVS Pharmacy, Inc.
Riverwatch CVS, Inc.	1	CVS Pharmacy, Inc.
Robious CVS, Inc.	1	CVS Pharmacy, Inc.
Rockingham CVS, L.L.C.	1	CVS MI Distribution, Inc.
Rockville MD CVS, L.L.C.	1	CVS of Maryland, Inc.
Rockville Pike CVS, Inc.	1	CVS Pharmacy, Inc.
Rocky Hill Cromwell CVS, Inc.	1	CVS Pharmacy, Inc.
Rocky Hill CVS, Inc.	1	CVS Pharmacy, Inc.
Rolling Meadows CVS, L.L.C.	1	CVS Pharmacy, Inc.
Roosevelt CVS, L.L.C.	1	CVS Pharmacy, Inc.
Roper Mountain Road CVS, Inc.	1	CVS Pharmacy, Inc.
Rosa Narg CVS, Inc.	1	CVS Pharmacy, Inc.
Rosemont PA CVS, Inc.	1	CVS Pharmacy, Inc.
Roswell CVS, Inc.	1	CVS Pharmacy, Inc.
Roswell Rivermont Station CVS, Inc.	1	CVS Pharmacy, Inc.
Round Lake CVS, L.L.C.	1	CVS Pharmacy, Inc.
Route 202 Whitpain CVS, Inc.	1	CVS Pharmacy, Inc.
Roxborough CVS, Inc.	1	CVS Pharmacy, Inc.
Royersford CVS, Inc.	1	CVS Pharmacy, Inc.
Russell FL Apache CVS, L.L.C.	1	CVS Pharmacy, Inc.
Sagev CVS, L.L.C.	1	CVS Pharmacy, Inc.
Sem Furr Road CVS, Inc.	1	CVS Pharmacy, Inc.
Sandusky CVS, Inc.	1	CVS Pharmacy, Inc.
Sandy Plains CVS, Inc.	1	CVS Pharmacy, Inc.
Sayre CVS, Inc.	1	CVS Pharmacy, Inc.
Schaumburg CVS, L.L.C.	1	CVS Pharmacy, Inc.
Schnecksville CVS, Inc.	1	CVS Pharmacy, Inc.
Scranton Davis CVS, Inc.	1	CVS Pharmacy, Inc.
Scranton Main CVS, Inc.	1	CVS Pharmacy, Inc.

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
SEC CVS, Inc.	1	CVS Pharmacy, Inc.
Sedalia NC CVS, Inc.	1	CVS Pharmacy, Inc.
Sedwick Durham CVS, L.L.C.	1	CVS IN Distribution, Inc.
Senip CVS, L.L.C.	1	CVS Pharmacy, Inc.
Severn CVS, Inc.	1	CVS Pharmacy, Inc.
Seymour CVS, Inc.	1	CVS Pharmacy, Inc.
Shallowford Road CVS, Inc.	1	CVS Pharmacy, Inc.
Shamokin CVS, Inc.	1	CVS Pharmacy, Inc.
Sharon Hill CVS, Inc.	1	CVS Pharmacy, Inc.
Sheffield Avenue CVS, L.L.C.	1	CVS RX Services, Inc.
Shelby Township CVS, Inc.	1	CVS Pharmacy, Inc.
Shelbyville Main CVS, Inc.	1	CVS Pharmacy, Inc.
Shoemaker CVS, Inc.	1	CVS Pharmacy, Inc.
Shoppers Village CVS, Inc.	1	CVS Pharmacy, Inc.
Shopperstown CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Showalter CVS, Inc.	1	CVS Pharmacy, Inc.
Sibley Chicago CVS, L.L.C.	1	CVS Pharmacy, Inc.
Sillington Road CVS, Inc.	1	CVS Pharmacy, Inc.
Silver Hill CVS, Inc.	1	CVS Pharmacy, Inc.
Silverbrook CVS, Inc.	1	CVS Pharmacy, Inc.
Silverton CVS, Inc.	1	CVS Pharmacy, Inc.
Simsbury CVS, Inc.	1	CVS Pharmacy, Inc.
Skokie CVS, L.L.C.	1	CVS Pharmacy, Inc.
Smith Palatine CVS, L.L.C.	1	CVS Pharmacy, Inc.
Smyrna Concord Road CVS, Inc.	1	CVS Pharmacy, Inc.
Smyrna CVS, Inc.	1	CVS Pharmacy, Inc.
Snelville CVS, Inc.	1	CVS Pharmacy, Inc.
Snelville GA CVS, Inc.	1	CVS Pharmacy, Inc.
Socastee SC CVS, Inc.	1	CVS Pharmacy, Inc.
Souderton CVS, Inc.	1	CVS Pharmacy, Inc.
South Brook CVS, Inc.	1	CVS Pharmacy, Inc.
South Carolina CVS Pharmacy, L.L.C.	7	CVS Pharmacy, Inc.
South Carolina CVS, Inc.	1	CVS Pharmacy, Inc.
South Lincoln Newtown CVS, Inc.	1	CVS Pharmacy, Inc.
South Lyon CVS, Inc.	1	CVS Pharmacy, Inc.
South Philadelphia CVS, Inc.	1	CVS Pharmacy, Inc.
South Providence CVS, Inc.	1	Cranston-Reservoir CVS, Inc.

FEDERAL TRADE COMMISSION DECISIONS
VOLUME 147

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
South Wabash CVS, L.L.C.	1	CVS RX Services, Inc.
South Windsor CVS, Inc.	1	CVS Pharmacy, Inc.
Southbury CVS, Inc.	1	CVS Pharmacy, Inc.
Southern Greenfield CVS, L.L.C.	1	CVS Pharmacy, Inc.
Southern Tempe CVS, L.L.C.	1	CVS Pharmacy, Inc.
Southington Main Street CVS, Inc.	1	CVS Pharmacy, Inc.
Southington Queen CVS, Inc.	1	CVS Pharmacy, Inc.
Sparkleberry Lane CVS, Inc.	1	CVS Pharmacy, Inc.
Springfield PA CVS, Inc.	1	CVS Pharmacy, Inc.
Springfield Spans CVS, Inc.	1	CVS Pharmacy, Inc.
Sproul Broomall CVS, Inc.	1	CVS Pharmacy, Inc.
St. Clair CVS, Inc.	1	CVS Pharmacy, Inc.
Stamford CVS, Inc.	1	CVS Pharmacy, Inc.
Stamford Hope Street CVS, Inc.	1	CVS Pharmacy, Inc.
Stamford Ridgeway CVS, Inc.	1	CVS Pharmacy, Inc.
Standard Drug Company	18	CVS Pharmacy, Inc.
State Park Road CVS, Inc.	1	CVS Pharmacy, Inc.
Stenton Avenue CVS, Inc.	1	CVS Pharmacy, Inc.
Sterrettanle Road CVS, Inc.	1	CVS Pharmacy, Inc.
Stone Mountain CVS, Inc.	1	CVS Pharmacy, Inc.
Stony Island Chicago CVS, L.L.C.	1	CVS Pharmacy, Inc.
Suffield CVS, Inc.	1	CVS Pharmacy, Inc.
Sugarloaf Parkway CVS, Inc.	1	CVS Pharmacy, Inc.
Sun Lakes CVS, L.L.C.	1	CVS Pharmacy, Inc.
Sunset Crossing CVS, Inc.	1	CVS Pharmacy, Inc.
Sunset Henderson CVS, L.L.C.	1	CVS Pharmacy, Inc.
Surprise CVS, L.L.C.	1	CVS Pharmacy, Inc.
Suwanee CVS, Inc.	1	CVS Pharmacy, Inc.
Swamp New Britain CVS, Inc.	1	CVS Pharmacy, Inc.
Swansea IL CVS, L.L.C.	1	CVS Pharmacy, Inc.
Swatara Square CVS, Inc.	1	CVS Pharmacy, Inc.
SWC CVS, Inc.	1	CVS Pharmacy, Inc.
Tannersville CVS, Inc.	1	CVS Pharmacy, Inc.
Tara Boulevard CVS, Inc.	1	CVS Pharmacy, Inc.
Telegraph CVS, Inc.	1	CVS Pharmacy, Inc.
Tennessee CVS Pharmacy, L.L.C.	5	CVS Pharmacy, Inc.
Third Lake CVS, L.L.C.	1	CVS Pharmacy, Inc.

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
Thomas Phoenix CVS, L.L.C.	1	CVS RX Services, Inc.
Thornbury CVS, Inc.	1	CVS Pharmacy, Inc.
Thorndale PA CVS, Inc.	1	CVS Pharmacy, Inc.
Tiverton CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Tolland CVS, Inc.	1	CVS Pharmacy, Inc.
Toombs Avenue CVS, L.L.C.	1	CVS IN Distribution, Inc.
Torresdale CVS, Inc.	1	CVS Pharmacy, Inc.
Torrington Main Street CVS, Inc.	1	CVS Pharmacy, Inc.
Towanda CVS, Inc.	1	CVS Pharmacy, Inc.
Tower CVS, Inc.	1	CVS Pharmacy, Inc.
Towne Lake Parkway CVS, Inc.	1	CVS Pharmacy, Inc.
Trappe CVS, Inc.	1	CVS Pharmacy, Inc.
Tucker CVS, Inc.	1	CVS Pharmacy, Inc.
Tucson AZ CVS, L.L.C.	1	CVS Pharmacy, Inc.
Twenty Third Falmount CVS, Inc.	1	CVS Pharmacy, Inc.
Tyrone CVS, Inc.	1	CVS Pharmacy, Inc.
Union Boulevard CVS, Inc.	1	CVS Pharmacy, Inc.
Union Lehigh CVS, Inc.	1	CVS Pharmacy, Inc.
University Mesa CVS, L.L.C.	1	CVS Pharmacy, Inc.
University St. Paul CVS, L.L.C.	1	CVS Pharmacy, Inc.
University-Wheaton CVS, Inc.	1	CVS of DC and VA, Inc.
Upper Gwynedd CVS, Inc.	1	CVS Pharmacy, Inc.
Upper Hembree CVS, Inc.	1	CVS Pharmacy, Inc.
Upper Uwchlan CVS, Inc.	1	CVS Pharmacy, Inc.
Valley Verde NV CVS, L.L.C.	1	CVS Pharmacy, Inc.
Vernon CVS, Inc.	1	CVS Pharmacy, Inc.
Village Plaza CVS, Inc.	1	CVS Pharmacy, Inc.
Vine & Taft CVS, Inc.	1	CVS Pharmacy, Inc.
Vinings Jubilee CVS, Inc.	1	CVS Pharmacy, Inc.
Virginia CVS Pharmacy, L.L.C.	10	CVS Pharmacy, Inc.
W. Ponce DeLeon CVS, Inc.	1	CVS Pharmacy, Inc.
Wadsworth CVS, Inc.	1	CVS Pharmacy, Inc.
Wadsworth High Street CVS, Inc.	1	CVS Pharmacy, Inc.
Wake Forest CVS, Inc.	1	CVS Pharmacy, Inc.
Waldorf MD CVS, L.L.C.	1	CVS of Maryland, Inc.
Walnut Hill Plaza CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Walnut Street CVS, Inc.	1	CVS Pharmacy, Inc.

FEDERAL TRADE COMMISSION DECISIONS
VOLUME 147

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
Warm Springs Rainbow CVS, L.L.C.	1	CVS Pharmacy, Inc.
Warm Springs Road CVS, L.L.C.	3	CVS Pharmacy, Inc.
Warner McQueen CVS, L.L.C.	1	CVS Pharmacy, Inc.
Warren Avenue CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Warren CVS, L.L.C.	1	CVS MI Distribution, Inc.
Warren R.I. CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Warwick City Hall CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Warwick Neck CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Washington Chicago CVS, L.L.C.	1	CVS Pharmacy, Inc.
Washington Connecticut CVS, Inc.	1	CVS Pharmacy, Inc.
Washington E Street CVS, Inc.	1	CVS Pharmacy, Inc.
Washington Lamb CVS, L.L.C.	1	CVS RX Services, Inc.
Waterbury Chase CVS, Inc.	1	CVS Pharmacy, Inc.
Waterbury West Main CVS, Inc.	1	CVS Pharmacy, Inc.
Waterbury Westwood CVS, Inc.	1	CVS Pharmacy, Inc.
Waterford Boston Post CVS, Inc.	1	CVS Pharmacy, Inc.
Waterway Drive CVS, Inc.	1	CVS Pharmacy, Inc.
Weaukegan CVS, L.L.C.	1	CVS Pharmacy, Inc.
Waverly TN CVS, Inc.	1	CVS Pharmacy, Inc.
Wayne Avenue CVS, Inc.	1	CVS Pharmacy, Inc.
Wayne CVS, Inc.	1	CVS Pharmacy, Inc.
Webster Avenue CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
West Aspetuck CVS, Inc.	1	CVS Pharmacy, Inc.
West Avenue CVS, Inc.	1	CVS Pharmacy, Inc.
West Broad Street CVS, Inc.	1	CVS of DC and VA, Inc.
West Calhoun CVS, Inc.	1	CVS Pharmacy, Inc.
West Chester Pike CVS, Inc.	1	CVS Pharmacy, Inc.
West College Ave CVS, Inc.	1	CVS Pharmacy, Inc.
West Hartford Boulevard CVS, Inc.	1	CVS Pharmacy, Inc.
West Hartford CVS, Inc.	1	CVS Pharmacy, Inc.
West Hartford Route 4 CVS, Inc.	1	CVS Pharmacy, Inc.
West Hubbard CVS, L.L.C.	1	CVS Pharmacy, Inc.
West Hunter Street CVS, L.L.C.	1	CVS VA Distribution, Inc.
West Jackson CVS, L.L.C.	1	CVS Pharmacy, Inc.
West Lemon CVS, Inc.	1	CVS Pharmacy, Inc.
West Warwick CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
West Warwick Main Street CVS, Inc.	1	Cranston-Reservoir CVS, Inc.

Decision and Order

Privileged and Highly Confidential

CVS/pharmacy
Rx Store Entities with Store Count

EntityName	Store Count by Entity	Owner
West Warwick Providence CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Western Chic CVS, L.L.C.	1	CVS Pharmacy, Inc.
Westland MI CVS, L.L.C.	1	CVS Pharmacy, Inc.
Wethersfield CVS, Inc.	1	CVS Pharmacy, Inc.
Whalley Avenue CVS, Inc.	1	CVS Pharmacy, Inc.
Wheaton CVS, L.L.C.	1	CVS Pharmacy, Inc.
White Bear Lake CVS, L.L.C.	1	CVS Pharmacy, Inc.
White Cross Stores, Inc. No. 14	58	Revco Discount Drug Centers, Inc.
White Lake CVS, Inc.	1	CVS Pharmacy, Inc.
Whitpain CVS, Inc.	1	CVS Pharmacy, Inc.
Williamsburg CVS, Inc.	1	CVS Pharmacy, Inc.
Williamatic Main Street CVS, Inc.	1	CVS Pharmacy, Inc.
Wilmer Road CVS, L.L.C.	1	CVS IN Distribution, Inc.
Wilmore Washington CVS, L.L.C.	1	CVS IN Distribution, Inc.
Wilson Boulevard CVS, Inc.	1	CVS of DC and VA, Inc.
Wilton CT CVS, Inc.	1	CVS Pharmacy, Inc.
Windsor Broad Street CVS, Inc.	1	CVS Pharmacy, Inc.
Windsor CVS, Inc.	1	CVS Pharmacy, Inc.
Windward Plaza CVS, Inc.	1	CVS Pharmacy, Inc.
Winfield CVS, L.L.C.	1	CVS Pharmacy, Inc.
Winsted CVS, Inc.	1	CVS Pharmacy, Inc.
Wisconsin CVS Pharmacy, L.L.C.	25	CVS Pharmacy, Inc.
Woodbridge CVS, Inc.	1	CVS Pharmacy, Inc.
Woodbury MN CVS, L.L.C.	1	CVS Pharmacy, Inc.
Woodlawn Avenue CVS, Inc.	1	CVS Pharmacy, Inc.
Woodlawn Chicago CVS, L.L.C.	1	CVS Pharmacy, Inc.
Woodridge CVS, L.L.C.	1	CVS Pharmacy, Inc.
Woodruff Road CVS, Inc.	1	CVS Pharmacy, Inc.
Woodward Detroit CVS, L.L.C.	13	CVS Pharmacy, Inc.
Woonsocket CVS, Inc.	1	Cranston-Reservoir CVS, Inc.
Woonsocket Prescription Center, Inc.	1	Cranston-Reservoir CVS, Inc.
Wyoming MI CVS, Inc.	1	CVS Pharmacy, Inc.
Yardley CVS, Inc.	1	CVS Pharmacy, Inc.
Yeadon (Pa.) CVS, Inc.	1	CVS Pharmacy, Inc.
York Road CVS, Inc.	1	CVS Pharmacy, Inc.
Grand	6186	

Analysis to Aid Public Comment

**ANALYSIS OF CONSENT ORDER TO AID PUBLIC
COMMENT**

The Federal Trade Commission has accepted, subject to final approval, a consent agreement from CVS Caremark Corporation (“CVS”).

The proposed consent order has been placed on the public record for thirty (30) days for receipt of comments by interested persons. Comments received during this period will become part of the public record. After thirty (30) days, the Commission will again review the agreement and the comments received, and will decide whether it should withdraw from the agreement and take appropriate action or make final the agreement’s proposed order.

The Commission’s proposed complaint alleges that CVS is in the business of selling prescription and non-prescription medicines and supplies, as well as other products. It operates, among other things, approximately 6,300 retail pharmacy stores in the United States (collectively, “CVS pharmacies”) and online and mail order pharmacy businesses. The company allows consumers buying products in CVS pharmacies to pay for their purchases with credit, debit and electronic benefit transfer cards; insurance cards; personal checks; or cash.

The complaint alleges that in conducting its business, CVS routinely obtains information from or about its customers, including, but not limited to, name; telephone number; address; date of birth; bank account number; payment card account number and expiration date; driver’s license number or other government-issued identification; prescription information, such as medication and dosage, prescribing physician name, address, and telephone number, health insurer name, and insurance account number and policy number; and Social Security number. The company also collects and maintains employment information from its employees, which includes, among other things, Social Security numbers.

Analysis to Aid Public Comment

The complaint further alleges that CVS engaged in a number of practices that, taken together, failed to provide reasonable and appropriate security for sensitive information from consumers and employees. In particular, CVS failed to: (1) implement policies and procedures to dispose securely of such information, including, but not limited to, policies and procedures to render the information unreadable in the course of disposal; (2) adequately train employees to dispose securely of such information; (3) use reasonable measures to assess compliance with its established policies and procedures for the disposal of such information; or (4) employ a reasonable process for discovering and remedying risks to such information.

The complaint alleges that as a result of these failures, CVS pharmacies discarded materials containing sensitive information in clear readable text (such as prescriptions, prescription bottles, pharmacy labels, computer printouts, prescription purchase refunds, credit card receipts, and employee records) in unsecured, publicly-accessible trash dumpsters on numerous occasions. For example, in July 2006 and continuing into 2007, television stations and other media outlets reported finding such information about customers and employees in unsecured dumpsters used by CVS pharmacies in at least 15 cities throughout the United States. When discarded in publicly-accessible dumpsters, such information can be obtained by individuals for purposes of identity theft or the theft of prescription medicines.

The proposed order applies to sensitive information about consumers and employees obtained by CVS. It contains provisions designed to prevent CVS from engaging in the future in practices similar to those alleged in the complaint.

Part I of the proposed order prohibits misrepresentations about the security, confidentiality, and integrity of sensitive information.

Part II of the order requires CVS to establish and maintain a comprehensive information security program that is reasonably designed to protect the security, confidentiality, and integrity of such information (whether in paper or electronic format) about

Analysis to Aid Public Comment

consumers, employees, and those seeking to become employees. The order covers health and other sensitive information obtained by all CVS entities, including, but not limited to, retail pharmacies and the pharmacy benefit management business. The security program must contain administrative, technical, and physical safeguards appropriate to CVS's size and complexity, the nature and scope of its activities, and the sensitivity of the information collected from or about consumers and employees. Specifically, the order requires CVS to:

- Designate an employee or employees to coordinate and be accountable for the information security program.
- Identify material internal and external risks to the security, confidentiality, and integrity of customer information that could result in the unauthorized disclosure, misuse, loss, alteration, destruction, or other compromise of such information, and assess the sufficiency of any safeguards in place to control these risks.
- Design and implement reasonable safeguards to control the risks identified through risk assessment, and regularly test or monitor the effectiveness of the safeguards' key controls, systems, and procedures.
- Develop and use reasonable steps to select and retain service providers capable of appropriately safeguarding personal information they receive from CVS, and require service providers by contract to implement and maintain appropriate safeguards.
- Evaluate and adjust its information security programs in light of the results of testing and monitoring, any material changes to operations or business arrangements, or any other circumstances that it knows or has reason to know may have material impact on its information security program.

Analysis to Aid Public Comment

Part III of the proposed order requires CVS to obtain within one year, and on a biennial basis thereafter for a period of twenty (20) years, an assessment and report from a qualified, objective, independent third-party professional, certifying, among other things, that: (1) it has in place a security program that provides protections that meet or exceed the protections required by Part II of the proposed order; and (2) its security program is operating with sufficient effectiveness to provide reasonable assurance that the security, confidentiality, and integrity of sensitive consumer and employee information has been protected.

Parts IV through VIII of the proposed order are reporting and compliance provisions. Part IV requires CVS to retain documents relating to its compliance with the order. For most records, the order requires that the documents be retained for a five-year period. For the third-party assessments and supporting documents, CVS must retain the documents for a period of three years after the date that each assessment is prepared. Part V requires dissemination of the order now and in the future to persons with responsibilities relating to the subject matter of the order. Part VI ensures notification to the FTC of changes in corporate status. Part VII mandates that CVS submit a compliance report to the FTC within 90 days, and periodically thereafter as requested. Part VIII is a provision “sunsetting” the order after twenty (20) years, with certain exceptions.

The Commission conducted its investigation jointly with the Office for Civil Rights in the Department of Health and Human Services (“OCR-HHS”). Working together, the Commission and OCR-HHS each entered into separate but coordinated agreements with CVS to resolve all the issues of both agencies.

This is the Commission’s twenty-fourth case to challenge the failure by a company to implement reasonable information security practices, and the first case: (1) involving a health provider, (2) proceeding jointly with OCR-HHS, and (3) challenging the security of employee data.

Analysis to Aid Public Comment

The purpose of this analysis is to facilitate public comment on the proposed order. It is not intended to constitute an official interpretation of the proposed order or to modify its terms in anyway.

INTERLOCUTORY, MODIFYING,
VACATING, AND MISCELLANEOUS
ORDERS
