

CALIFORNIA COMPREHENSIVE COMPLIANCE PROGRAM DECLARATION

Victory Pharma, Inc. (“Victory”) has developed a Comprehensive Compliance Program that is designed to comply with applicable federal and state laws and industry standards relating to the marketing and promotion of our products. To our knowledge as of the date of this declaration, Victory is in compliance with our Comprehensive Compliance Program and with California Health & Safety Code sections 119400-119402.

Dated July 1, 2008