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**UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION**

**COMMISSIONERS:**                   **Edith Ramirez, Chairwoman  
Maureen K. Ohlhausen  
Terrell McSweeney**

**Docket No. C-4602**

**COMPLAINT**

Pursuant to the provisions of the Federal Trade Commission Act and the Clayton Act, and its authority thereunder, the Federal Trade Commission (“Commission”), having reason to believe that the above-named respondent Valeant Pharmaceuticals International, Inc. (“Valeant”) acquired Paragon Holdings I, Inc. (“Paragon”), and that acquisition violated Section 5 of the Federal Trade Commission Act as amended, 15 U.S.C. § 45, and Section 7 of the Clayton Act, as amended, 15 U.S.C. § 18, and it appearing to the Commission that a proceeding by it in respect thereof would be in the public interest, hereby issues this Complaint, stating its charges as follows:

1. Respondent’s principal executive offices are located at 2150 St. Elzéar Blvd. West, Laval, Quebec, H7L 4A8, Canada. Respondent has offices in the United States, including at 400 Somerset Corporate Blvd., Bridgewater, New Jersey 08807 and 50 Technology Drive, Irvine, California 92618.

2. Respondent engages in, among other things, developing, manufacturing, and selling plastic discs





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