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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
UNITED STATES OF AMERICA *ex rel.* :
JOHN DOE, :
 :
 :
 Plaintiff, :
 :
 v. :
 :
 COLUMBIA UNIVERSITY IN THE CITY OF :
 NEW YORK, :
 :
 Defendant. :
-----X

13 Civ. 5028 (PAE)

**COMPLAINT-IN-
INTERVENTION OF THE
UNITED STATES**

-----X
UNITED STATES OF AMERICA, :
 :
 Plaintiff-Intervenor, :
 :
 v. :
 :
 THE TRUSTEES OF COLUMBIA UNIVERSITY :
 IN THE CITY OF NEW YORK, :
 :
 Defendant. :
-----X

The United States of America (the “Government”), by its attorney Preet Bharara, United States Attorney for the Southern District of New York, alleges for its Complaint-In-Intervention as follows:

Preliminary Statement

1. The Government brings this Complaint-In-Intervention seeking damages and penalties against The Trustees of Columbia University in the City of New York (“Columbia”) under the False Claims Act, 31 U.S.C. §§ 3729 *et seq.* (the “FCA”), and, in the alternative, under the common law for payment under mistake of fact and unjust enrichment. From July 1, 2003 through June 30, 2015 (*i.e.*, fiscal years 2004 – 2015) (the “Relevant Period”), Columbia conducted research associated with certain federally sponsored research grants primarily in buildings not owned or operated by Columbia and improperly used its on-campus facilities and administrative rate (the “F&A Rate”) instead of the lower modified off-campus F&A Rate when seeking federal reimbursement for indirect costs associated with these grants. As a result, Columbia received excessive indirect cost recoveries from the Government for these federally sponsored grants.

Jurisdiction and Venue

2. This Court has subject matter jurisdiction over the Government’s claims under the FCA pursuant to 31 U.S.C. § 3730(a) and 28 U.S.C. §§ 1331 and 1345, and over the Government’s common law claims pursuant to 28 U.S.C. § 1345.

3. This Court may exercise personal jurisdiction over Columbia, and venue is proper in this District pursuant to 31 U.S.C. § 3732(a) as well as 28 U.S.C. §§ 1391(b), because Columbia resides and transacts business in the Southern District of New York.

The Parties

4. Plaintiff is the United States of America. Through the Department of Health and Human Services (“HHS”), the Government awards and administers federal research grants. HHS provides grant funding for medical research performed by academic institutions, including for the grants at issue, through the National Institutes of Health (“NIH”).

5. Defendant Columbia is a university located in New York, New York.

OMB Circular A-21 and Indirect Cost Reimbursement

6. OMB Circular No. A-21 (the “Circular”), codified at 2 C.F.R. Part 220 (Cost Principles for Educational Institutions (OMB Circular A-21)), establishes “principles for determining costs applicable to grants, contracts, and other agreements with educational institutions.” Circular, Preamble ¶ 1. The Circular is “designed to provide that the Federal Government bear its fair share of total costs.” *Id.*

7. The Circular governs, among other things, how educational institutions are reimbursed for direct and indirect costs for federally sponsored research grants. “Direct costs” refer to costs that “can be identified specifically with a particular sponsored project,” such as the salary of a principal investigator or the cost of materials used for a project. Circular, Section B.4. “Indirect costs,” which are also referred to as “facilities and administrative costs” or “F&A costs,” refer to costs “that are incurred for common or joint objectives and, therefore, cannot be identified readily and specifically” with work performed on a particular sponsored research project. Circular, Section E.1. The “facilities” component of F&A costs refers to “depreciation and use allowances, interest on debt associated with certain buildings, equipment and capital improvements, operation and maintenance expenses, and library expenses.” Circular, Section F.1. The “administrative” component refers to “general administration and general

expenses, departmental administration, sponsored projects administration, student administration and services, and all other types of expenditures not listed specifically under one of the subcategories of facilities cost.” *Id.*

8. By accepting NIH funding, educational institutions agree to comply with all applicable laws, regulations, and policies governing the use of the federal funds, including those that are intended to ensure costs charged to federal awards are permissible under cost allocation principles. As a general matter, educational institutions are only entitled to seek and receive federal reimbursement for actual costs incurred by the institution in support of federally sponsored grants.

9. Indirect costs are recovered through the application of a university’s F&A Rate for organized research, which is a percentage applied to a subset of direct costs incurred for a project (referred to as “Modified Total Direct Costs”) to determine the indirect cost recovery. As the “cognizant Federal agency” under the Circular, HHS is responsible for negotiating and approving the F&A Rates used by educational institutions.

10. HHS and educational institutions negotiate one F&A Rate for organized research that is primarily performed on-campus (“On-Campus F&A Rate”), and a separate F&A Rate for research that is primarily performed off-campus (“Off-Campus F&A Rate”). The On-Campus F&A Rate is typically more than double the Off-Campus F&A Rate to account for the fact that when conducting research off-campus educational institutions do not incur the indirect facilities-related costs (*e.g.*, maintenance and operations expenses) that they would otherwise incur if the activities were performed on-campus.

11. During the Relevant Period, Columbia’s On-Campus F&A Rate was approximately 61% and its Off-Campus F&A Rate was 26%. Columbia also negotiated a

modified Off-Campus F&A Rate with HHS, which included a small additional allowance for library costs and was to be applied to research conducted within a certain proximity of the Columbia campus (“Modified Off-Campus F&A Rate”). During the Relevant Period, Columbia’s Modified Off-Campus F&A Rate was 29.4%.

12. These rates were memorialized in a F&A Rate agreement executed by Columbia and HHS (the “F&A Rate Agreement”). The F&A Agreement states in pertinent part:

For all activities within a 50 mile radius of the campus and performed in facilities not owned and operated by the institution and to which rent is directly allocated to the project, the off-campus modified rate will apply. For all activities outside a 50 mile radius of campus the off campus rate will apply. Grants or contracts will not be subject to more than one indirect cost rate. If more than 50% of a project is performed off-campus, the appropriate off-campus rate will apply to the entire project.

Defendant’s Improper Conduct

13. Columbia has a collaborative relationship with the New York State Psychiatric Institute (“NYSPI”), a clinical research facility administered by the New York State Office of Mental Health (“OMH”). Columbia and NYSPI share certain staff, facilities, and equipment, and participate in joint research projects.

14. Columbia faculty perform research in two off-campus buildings owned by the State of New York and operated by NYSPI: (i) the Lawrence Kolb Research Building, located at 40 Haven Avenue in New York, New York (the “Kolb Building”); and (ii) the Herbert Pardes Building, located at 1051 Riverside Drive, New York, New York (the “Pardes Building”) (collectively, the “NYSPI Buildings”). Columbia faculty also perform research in another off-campus building owned and operated by the City of New York, located at 600 West 168th Street, New York, New York (the “City Building”).

15. For most of the Relevant Period, Columbia did not pay the State of New York for use of the NYSPI Buildings, and therefore did not incur indirect “facilities-related” costs with respect to the medical research performed in these buildings.¹ Similarly, Columbia did not pay the City of New York for use of the City Building.

16. During the Relevant Period, Columbia received NIH funding for 423 grants where the research primarily took place in the off-campus NYSPI Buildings or the off-campus City Building (the “NIH Grants”). Columbia improperly applied the On-Campus F&A Rate — instead of the much lower Modified Off-Campus F&A Rate — when seeking indirect cost reimbursements from NIH for the NIH Grants. As a result, Columbia’s sought and received excessive indirect cost recoveries from NIH. The NIH Grants are listed in Exhibit A, attached hereto.

17. Columbia’s practice of using the On-Campus F&A Rate to calculate the indirect cost reimbursements sought for the NIH Grants was contrary to the cost principles set forth in the Circular. A grantee is not permitted to recover indirect costs at the On-Campus F&A Rate if it does not incur costs relating to the space where the research is conducted, as Columbia did here.

18. During the Relevant Period, to obtain indirect cost reimbursements, Columbia periodically submitted to NIH certified Federal Financial Reports (“FFRs”) that improperly applied the On-Campus F&A Rate to calculate the indirect cost amounts claimed by the university. The certified FFRs signed by Columbia stated that they were “true, complete, and accurate.” At the time that Columbia submitted the FFRs for the NIH Grants, the university knew that it did not own or operate the NYSPI Buildings or the City Building where the research

¹ Starting in July 2011, shortly after the Office of the State Comptroller issued a report recommending that OMH seek fair consideration from Columbia for its ongoing use of state-owned facilities, Columbia began reimbursing New York State for the operating expenses, utilities, and telephone costs associated with space used in the Pardes Building.

was being primarily performed and did not incur any costs relating to those spaces for most of the Relevant Period, but nevertheless sought reimbursement based on the On-Campus F&A Rate.

19. During the Relevant Period, Columbia did not disclose to HHS, including NIH, that it did not own or operate the NYSPI Buildings or the City Building and did not pay facilities-related costs for the space. For example, Columbia did not disclose this fact in the F&A Rate proposal it submitted to HHS or during the subsequent lengthy F&A Rate negotiations that took place between the university and HHS. If NIH had known that Columbia did not own or operate the NYSPI Buildings and the City Building, it would not have paid Columbia indirect cost reimbursements at the On-Campus F&A Rate for the NIH Grants.

20. Furthermore, Columbia did not state on the applications for the NIH Grants that the research would be primarily performed off-campus. HHS' guide for preparing these applications states that "the Primary Location should be that of the applicant organization or identified as off-site in accordance with the conditions of the applicant organization's negotiated Facilities and Administrative (F&A) agreement." SF424 (R&R) Application Guide for NIH and Other PHS Agencies, Section 4.3. However, Columbia did not designate the NIH Grants as off-site and instead frequently included the main address for the College of Physicians & Surgeons in the section of the application that was supposed to list the primary performance location. Even where the NYSPI Buildings or the City Building were listed in that section of the grant application, or mentioned elsewhere in the application, Columbia failed to disclose that these buildings were not owned and operated by the university.

21. During the Relevant Period, Columbia personnel questioned whether it was appropriate to apply the On-Campus F&A Rate to the NIH Grants based on their understanding that the NYSPI Buildings were off-campus locations. Notwithstanding these internal concerns,

Columbia continued to apply the On-Campus F&A Rate to the NIH Grants and did not reach out to HHS to discuss the propriety of this practice.

22. Starting in fiscal year 2009, in lieu of paying rent for use of the Kolb Building, Columbia paid NYSPI a portion of the inflated indirect cost recoveries it received from NIH for research projects performed in the Kolb Building.

23. NIH agreed to calculate Columbia's indirect cost recoveries for the NIH Grants by applying the On-Campus F&A Rate based on its incorrect understanding that the research was being performed at sites owned and operated by Columbia. If NIH had known that the research was being performed in facilities owned and operated by the State of New York and City of New York and that Columbia was not incurring indirect "facility-related" costs in connection with these projects, NIH would have applied the much lower Modified Off-Campus F&A Rate to the NIH Grants.

FIRST CLAIM

Violations of the False Claims Act: Presenting False Claims for Payment (31 U.S.C. § 3729(a)(1)(2000), and, as amended, 31 U.S.C. § 3729(a)(1)(A))

24. The United States incorporates by reference paragraphs 1 through 23 above as if fully set forth in this paragraph.

25. The United States seeks relief against Columbia under Section 3729(a)(1) of the FCA, 31 U.S.C. § 3729(a)(1)(2000), and, as amended, 31 U.S.C. § 3729(a)(1)(A).

26. In seeking and receiving indirect cost recoveries for the NIH Grants that were calculated based on the improper application of the On-Campus F&A Rate, Columbia presented false or fraudulent claims for payment or approval in violation of 31 U.S.C. § 3729(a)(1)(2000), and, as amended, 31 U.S.C. § 3729(a)(1)(A).

27. By reason of the false or fraudulent claims that Columbia knowingly presented, the United States has been damaged in a substantial amount to be determined at trial, and is entitled to recover treble damages plus a civil monetary penalty for each false claim.

SECOND CLAIM

Violations of the False Claims Act: Use of False Statements (31 U.S.C. § 3729(a)(2)(2000) and, as amended, 31 U.S.C. § (a)(1)(B)(Supp. 2009))

28. The United States incorporates by reference paragraphs 1 through 23 above as if fully set forth in this paragraph.

29. The United States seeks relief against Columbia under Section 3729(a)(2) of the FCA, 31 U.S.C. § 3729(a)(2)(2000) and, as amended, 31 U.S.C. § 3729(a)(1)(B)(Supp. 2009).

30. In seeking and receiving indirect cost recoveries for the NIH Grants that were calculated based on the improper application of the On-Campus F&A Rate, Columbia made, used, and caused to be made and used, false records or statements that were material to getting false or fraudulent claims paid.

31. By reason of these false records or statements, the United States has been damaged in a substantial amount to be determined at trial and is entitled to recover treble damages plus a civil monetary penalty for each false record or statement.

THIRD CLAIM

Payment by Mistake of Fact

32. The Government incorporates by reference paragraphs 1 through 23 above as though fully set forth in this paragraph.

33. The Government seeks relief against Columbia to recover monies paid under mistake of fact.

34. The Government made payments to Columbia in connection with the indirect costs associated with the NIH Grants based on a mistaken and erroneous understanding that the research associated with these grants was being primarily performed on Columbia's campus in facilities owned and operated by Columbia and that Columbia was incurring indirect "facility-related" costs in connection with these grants.

35. This erroneous belief was material to the Government's calculation of the amount of indirect cost payments paid to Columbia in connection with the NIH Grants. If NIH had known that the research associated with the NIH Grants was being performed in facilities owned and operated by the State of New York and the City of New York and that Columbia was not incurring indirect "facility-related" costs in connection with these grants, NIH would have used the Modified Off-Campus F&A Rate to calculate the indirect costs payments for the NIH Grants, which would have resulted in lower payments to Columbia.

36. By reason of the foregoing, the Government has sustained damages in a substantial amount to be determined at trial.

FOURTH CLAIM

Unjust Enrichment

37. The Government incorporates by reference paragraphs 1 through 23 above as though fully set forth in this paragraph

38. In seeking and receiving indirect cost recoveries for the NIH Grants that were calculated based on the improper application of the On-Campus F&A Rate, Columbia received money to which it was not entitled and therefore was unjustly enriched. The circumstances of these payments are such that, in equity and good conscience, Columbia should not retain these payments, the amount of which is to be determined at trial

PRAYER FOR RELIEF

WHEREFORE, plaintiff, the United States, requests that judgment be entered in its favor as follows:

- (a) On the First and Second Claims for relief (violations of the FCA, 31 U.S.C. §§ 3729(a)(1) and 3729(a)(2) and, as amended, 31 U.S.C. §§ 3729(a)(1)(A) and 3729(a)(1)(B)), a judgment against Columbia for treble the United States' damages, in an amount to be determined at trial, plus an \$11,000 penalty for each false claim submitted in violation of the FCA;
- (b) On the First and Second Claims for relief, an award of costs pursuant to 31 U.S.C. § 3729(a)(3);
- (c) On the Third Claim for relief (Payment Under Mistake of Fact), a judgment in an amount to be determined at trial, together with costs and interest;
- (d) On the Fourth Claim for relief (Unjust Enrichment), a judgment in an amount to be determined at trial, together with costs and interest; and
- (e) Such further relief as is proper.

Dated: New York, New York
July 11, 2016

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EXHIBIT A

Exhibit A

Covered Grants

	<u>Grant Number</u>
1	1006609-1-24393
2	200SGV810
3	A06795 M-08-154
4	A07216 M07A00249
5	AA011293
6	AA017862
7	AG005213
8	AG017761
9	AG041795
10	AG043688
11	AI042848
12	AIR SC-03-02054-008
13	ASPH S2133-22/23S1
14	BRPI CU11-1189
15	CA072647
16	CA102484
17	CA109551
18	CA114064
19	CA133595
20	CA172814
21	CASAC CU13-3389
22	CCWRU CU09
23	CE000731
24	CNYCF 1R34MH096854-01A1COL
25	CU514107
26	CU514922
27	CU518621
28	CU519769
29	CU519938
30	CU5207
31	CU52109501
32	CU52112802
33	CU52123301
34	CU52190801

35 CU521993
36 CU522010
37 CU522205
38 CU522263
39 CU522358
40 CU522369
41 CU522484
42 CU522517
43 CU522721
44 CU522818
45 CU523056
46 CUMC 09020215
47 CUMC 120100300
48 CUMC 12070954-01
49 DA010755
50 DA012874
51 DA014055
52 DA017293
53 DA019399
54 DA020733
55 DA021108
56 DA021242
57 DA022455
58 DA023650
59 DA024001
60 DA025250
61 DA027124
62 DA027777
63 DA030095
64 DA030459
65 DA035485
66 DA036226
67 DA038530
68 DA06234
69 DA09862
70 DAMD17-03-1-0148
71 DARTC 5-30365.570
72 DE-FG02-07ER64334
73 DFCI 1154001
74 DK031813

75 DK060148
76 DREXEL 232547-3684
77 DUKEU 2032500
78 EB00416201A2
79 EB006855
80 EPA RD-83284801-1
81 ES010922
82 ES011601
83 ES013308
84 ES014400
85 ES015347
86 ES016074
87 ES017875
88 ES019004
89 ES019670
90 EY01001
91 EY011001
92 EY013435
93 EY013759
94 EY014978
95 EY015634
96 EY017039
97 EY017938
98 EY019007
99 EY019500
100 EY020631
101 F013474
102 FHI 630-5
103 FHI PO15000459
104 GBNEU0169BJ
105 GHC 2012119722
106 GM062246
107 GM070934
108 HD046786
109 HD055155
110 HD061940
111 HD071561
112 HD075664
113 HD55155
114 HG002806

115 HG005535
116 HG006596
117 HG007257
118 HHSN271201200543P
119 HJF 661110
120 HJFAMM 671292
121 HL065568
122 HL077096
123 HL081131
124 HL088942
125 HS013738
126 HSC 3210515046
127 JH 2001003650
128 JHU 2002342875
129 MD004768-02
130 MGH 217153
131 MH026212
132 MH036197
133 MH040210
134 MH040695
135 MH042206
136 MH045923
137 MH048514
138 MH048850
139 MH050733
140 MH058754
141 MH059244
142 MH060249
143 MH060387-10
144 MH060970-01A2 SC3
145 MH061399-07
146 MH061530-03
147 MH061906-03
148 MH062155-03
149 MH063852-04
150 MH064092-08
151 MH066058-03
152 MH066620-02
153 MH067068-06
154 MH067761-01A2

155 MH067912-02
156 MH071430
157 MH073640
158 MH073728
159 MH073821
160 MH073915
161 MH074118
162 MH076137
163 MH077156
164 MH077161
165 MH078993
166 MH079439
167 MH079488
168 MH079905
169 MH080022
170 MH080745
171 MH081107
172 MH081153
173 MH081968
174 MH082017
175 MH08225501
176 MH084029
177 MH084241
178 MH085227
179 MH086385
180 MH087395
181 MH087758
182 MH088405
183 MH088458
184 MH088702
185 MH090276
186 MH091276
187 MH091320
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192 MH092250
193 MH093338
194 MH093637

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197 MH096132
198 MH096274
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200 MH098039
201 MH098786
202 MH099251
203 MH099265
204 MH099322
205 MH104602
206 MH48858
207 MH50733
208 MH59602
209 MH63264
210 MH96132
211 MSKCC BD513579
212 MSSM 0255-5881-4609
213 MSSM 0255-6211-4609
214 MSSM 0255-7432-4609
215 MUSC 07-1657
216 MUSC CU07-1662
217 MUSC MH069887-01-01
218 MWRI 26-3301-4286
219 MWRI 4341
220 MWRI 7279
221 MWRI 9252
222 MWRI 9336
223 NBER 323552000799617700
224 NR010474
225 NR010822
226 NS029255
227 NS036658
228 NS036835
229 NS041603
230 NS042159
231 NS051566
232 NS064004
233 NS083037
234 NS083690

235 NS089456
236 NS38636
237 NSUH 11027
238 NWU 0600 520 S308 34
239 NYU CU11-2639
240 NYU F7107
241 NYUMC 08-1159
242 NYUMC CU12-1700
243 OD000114
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245 OH007432
246 OH008215
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248 ORHSUN 1002304
249 ORHSUN CU11-0385
250 P003427501
251 RFCUNY 41750B
252 RFCUNY 41848-A
253 RFMH #24619
254 RFMH #24756
255 RFMH #24891
256 RFMH #25200
257 RFMH #25237
258 RFMH #25238
259 RFMH #25310
260 RFMH #8690
261 RFMH 1007886-1-24791
262 RFMH 1007967-1-24812
263 RFMH 1008564/24989
264 RFMH 25034
265 RFMH 25038
266 RFMH 25055
267 RFMH 25131
268 RFMH 25207
269 RFMH 25220
270 RFMH 25237
271 RFMH 25304
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284 RFMH 25925
285 RFMH 25938
286 RFMH 25962
287 RFMH 25998
288 RFMH 26184
289 RFMH CU08-7508
290 RFMH CU09-3988
291 RFMH CU09-4659
292 RFMH CU09-4672
293 RFMH CU10-2743
294 RFMH CU10-2772
295 RFMH CU11-2347
296 RFMH CU11-2560
297 RFMH#101438
298 RFMH#101567
299 RIH 701-5530
300 RR024156-04S2 S5
301 RUTGER 4099
302 SDHRF-2007-03
303 SRFMH 903-1561D
304 SRFMH 1003593/2/2323
305 SRFMH 1004300/1/2370
306 SRFMH 1004341/6/2372
307 SRFMH 107612
308 SRFMH 114647
309 SRFMH 114780
310 SRFMH 116862
311 SRFMH 24382
312 SRFMH 24558
313 SRFMH 24586
314 SRFMH 24752

315 SRFMH 25021
316 SRFMH 25022
317 SRFMH 25032
318 SRFMH 25063
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321 SRFMH 25477
322 SRFMH 25484
323 SRFMH 25760
324 SRFMH 25771
325 SRFMH 25781
326 SRFMH 25824
327 SRFMH 88975
328 SRFMH 89613
329 SRFMH 903-1318X
330 SRFMH 903-1546C
331 SRFMH 903-1585A
332 SRFMH 903-1711E
333 SRFMH CU07-1868
334 SRFMH CU08-9228
335 SRFMH CU09-1603
336 SRFMH CU09-3133
337 SRFMH CU10-2265
338 SRFMH CU10-3765
339 SRFMH N01DA-5552
340 SRFMH-07-1820
341 SUNYOPT 580-41135
342 SUNYRF 44042
343 TULANE CU08-4476
344 TUL-HSC-120-08/09
345 TUL-HSC-3222-10/11
346 TUSM 5007836-SERV
347 UCHICA 37137
348 UCHICA 43359-5-31486-8608
349 UCSF 138342-4000
350 UCSF 4026SC
351 UCSF 4972SC
352 UCSF 557416-29863
353 UFLRDA UF11169
354 UMARY CU12-1520

355 UMARY CU12-1680
356 UMARY CU12-1681
357 UMARY CU12-1828
358 UMARY PO#S00002276
359 UMARY SR00002274
360 UMARY SR00002275
361 UMASS 6088143/RFS800
362 UMASS 6114667/RF9002
363 UMASS 6114667/RF900210
364 UMASS 6116829/RFS900
365 UMD SR00002273
366 UMIAMI CU09-2629
367 UMICHG 3000818901
368 UMICHG 3000971404
369 UMICHG 3001392918
370 UMINN N634619702
371 UMINN P663658701
372 UNC-CH 5-30772
373 UPENN 559189
374 UPMC 0025282(123087-2)
375 URMC 415292-G
376 USOC 11-1853
377 WSU10058
378 YU A07570 M07A00249
379 YU A07902 M07A00249
380 YU CU10-0193
381 YU MI2A11309
382 CU52248501
383 CU52248601
384 MH062089
385 MH074813
386 MH54793
387 SRFMH 1004344-9-2372
388 SRFMH 1005414/1/2403
389 SRFMH 10054142/5/240
390 SRFMH 1006611-2-2439
391 SRFMH 1006604-5-2439
392 SRFMH 1006604-5-24392
393 SRFMH 1006611-3-2439
394 SRFMH 25461

395 SRFMH 25762
396 SRFMH CU08-4091
397 SRFMH CU08-7402
398 SRFMH CU51896802
399 SRFMH-24388
400 TUL-HSC-120-09/10
401 TUL-HSC-3222-14/15
402 UCLA 2000-S-GV810
403 UCSD CU08-4471
404 UCSF CU07-1900
405 UMARY 00-0353
406 UMASS 6114667/RFS900
407 UMASS CU08-0474
408 UOFNC CU08-4478
409 UPENN 564260
410 UTSWMC GMO-000025
411 OD017908
412 OD019897
413 MH090356
414 BARNARD R01-068073-CU
415 CUMC 15070987
416 RFCUNY 41896A
417 RFMH 25004
418 RFMH 25834
419 RFMH 25939
420 RFMH 26054
421 UCI No.2014-3142
422 UCL CU14-1548
423 UMASS WA00250104/RFS2015109