

Rogue Internet Pharmacies

Voluntary Initiatives: Rogue Internet Pharmacies



A Quick Introduction to LegitScript

- Largest database of Internet pharmacies, classified by legality (public health laws)
- Legality = where operate from, and where ship to
- Endorsed/classified on behalf of drug safety regulators | partnerships
- Partners include Google, Visa, Microsoft, Pinterest, Facebook, Twitter, Amazon, numerous registrars
- Complimentary support for registrars' anti-abuse efforts and policy development



Why should intermediaries care about rogue Internet pharmacies?

- Among highest-risk sectors (97% illegal)
- Patient safety
 - Overdoses
 - Fake drugs – toxins
 - Fake drugs - untreated medical conditions
 - Deaths
 - Prescription drug addiction
- Regulatory risk



General approach by most registrars, some registries

- Typically fits within registrars' existing policies (but clarification never hurts!)
- Reactive, not proactive; based notifications from LegitScript and/or regulatory authorities
 - We don't charge registrars or registries for alerts and our support.
 - We stand by you throughout the process.
 - We review other complaints for accuracy.
- Not automated. Three+ analysts manually review all submissions to a registrar and must agree. Criminal activity and screenshots documented.
- Focus on clear-cut, easily verifiable criminal behavior



Anatomy of a rogue Internet pharmacy







How Does An Online Consultation Work?

Online consultations are a new concept in health care that utilize the Internet to improve patient access to physician care. The patient does not receive a traditional physical exam by the physician, but rather completes an online questionnaire and communicates with the physician using our secure online communication tool. Although online consultations will never take the place of traditional medicine, they do provide a means for patients to receive treatment for a limited number of conditions that, in certain circumstances, may not require a physical exam. We do not charge for online consultation.

How Can I Order Medications Without Seeing A Doctor?

As you know, the Internet has changed the way we live. A lot of the new services that were never in existence a few years ago, are now commonplace. Online medical reviews are among the "new" services that have been created as a result of the Internet. Although they are a relatively new idea in health care, they are becoming widely accepted as a convenient way to improve patient access to physician care. Instead of a traditional physical exam by the physician, the patient completes an online questionnaire and communicates with the physician using our secure online communication system. Even

QUANTITY	What Are Your Shipping Rates And Policies?				ADD TO CART
360 Pills	<u>Shipping</u> We ship to almost every country you can think of. i				
240 Pills					
180 Pills	2mg	\$949	\$460	\$2.56	
120 Pills	2mg	\$675	\$350	\$2.92	



Focus | Process

- Three “big bad” types of unsafe online pharmacy behavior that’s illegal everywhere.
 - **Sale of prescription drugs without a prescription.**
 - **Sale of** drugs that are considered unapproved for sale.
 - **The** practice pharmacy without the legally required license(s).
- Domain name suspension and locking
- The registrant has the right to appeal!



LegitScript Appeals Process

- First step: to provide pharmacy license or registration in jurisdictions where registrant was shipping drugs to.* We verify it.
 - **General rule: you have to be licensed as a pharmacy in the jurisdictions you are shipping drugs to. Burden of production on seller.**
 - **There is no privacy right to a pharmacy license. It's a public document.**
- Second step: re-review and document to registrar and registrant other illegal activity.
- Number of successful appeals beyond first step: zero (0). This is as it should be.



Common Questions

- Liability?
- Accuracy?
- Do you represent or act on behalf of third-parties?
- Which jurisdictions' laws apply? Point A and Point B.
- Are you US/English language only?
 - **No, we have policy experts and native speakers in all countries rogue Internet pharmacies primarily target: JP, CN, KR, FR, DE, IE, UK, ES, IT, PT, RU, BR, ID, IL, TR, NL, CA, TH, US**

