

Risk Reduction and Accountability: What's Working Today and What Do We Need for the Future?

March 2022

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ASOP Global is a nonprofit organization headquartered in Washington, D.C. with projects in the U.S., Canada, Europe, India and Asia. ASOP Global is dedicated to protecting consumers around the world, ensuring safe access to medications, and combating illegal online drug sellers and counterfeit medicines.



Educate
Provide consumers, providers, policymakers and other stakeholders information about how to stay safe when shopping for medicines online and offline.



Research
Development of credible data, trends and information on counterfeit medicines and illicit online drug sellers.



Influence
Protect consumers by influencing policymakers, ecommerce and online platforms, law enforcement and NGOs.

Collaborate
Work alongside U.S. and international partners to raise awareness and improve patient safety.



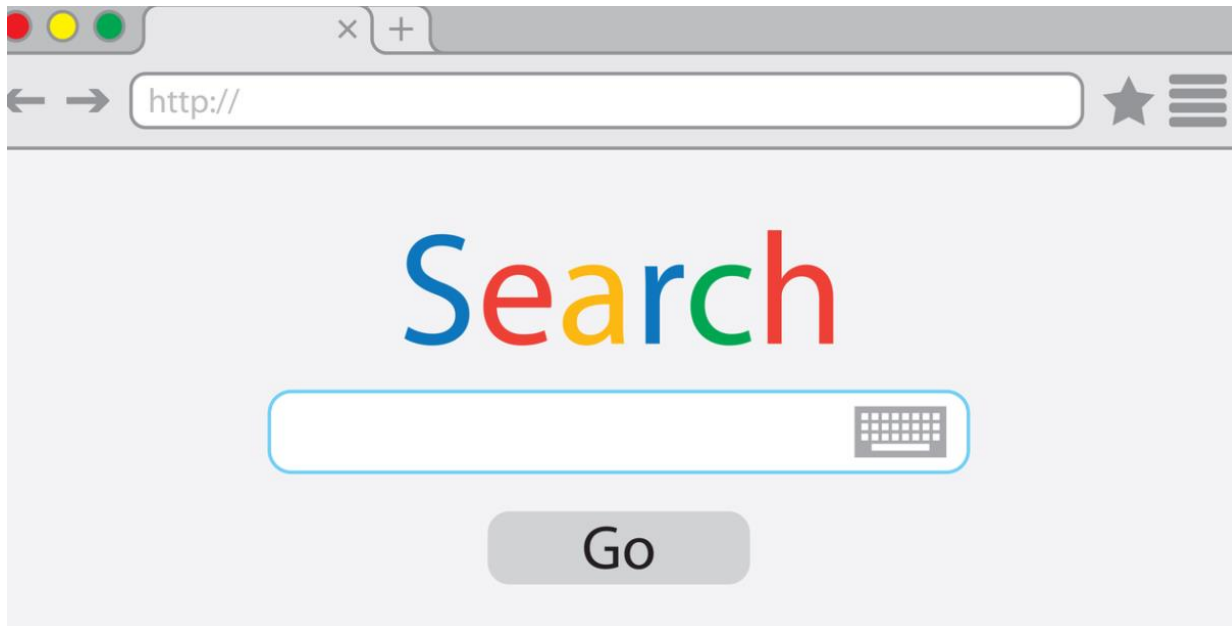
Americans Don't Understand the Risks



45% of Americans erroneously believe all websites offering healthcare services/prescription medications to Americans via the internet have been approved by the FDA or state regulators.

This misconception is even higher (59%) among those who have previously purchased prescription medicines online.

Americans Don't Understand the Risks



72% of Americans believe verified, safe websites selling prescription medications should appear first in search results or be clearly identified as legitimate.

Americans are Willing to Risk Safety

- **1 in 4 Americans say they would **accept higher risk**** when purchasing medicine online if it meant increased convenience and savings.
- **46% of Americans *would* be open to purchasing prescription medicines from an online source not sanctioned by a FDA or a state Board of Pharmacy if it increased their access, decreased their cost, and provided convenience to more medicines.**

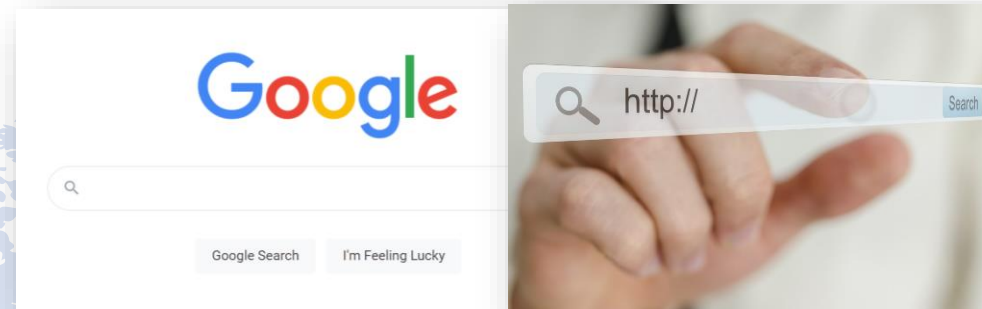


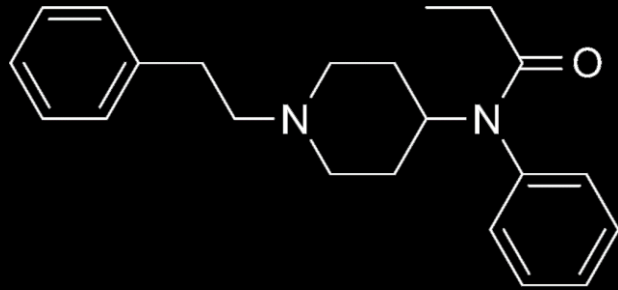
Americans' Exposure to Harm is Increasing

38% are familiar with an event where someone received a substandard or counterfeit prescription medication from an online source.

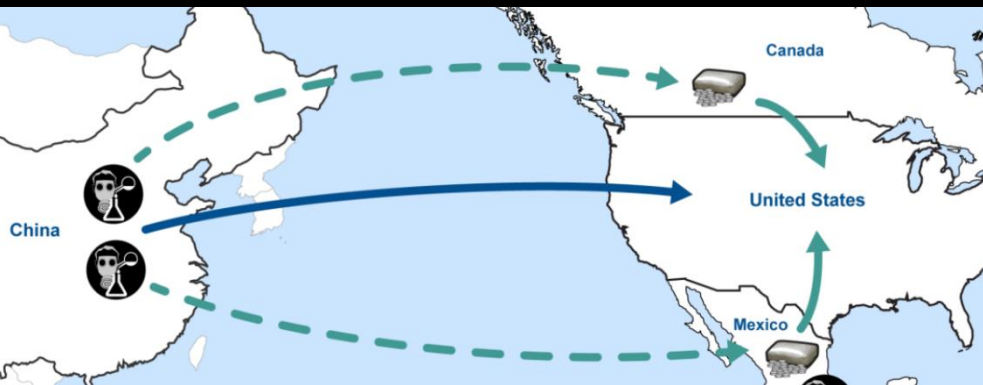
9 % increase from 2020.

The Consumer Internet Experience: Search, Social, Online Marketplaces





Websites



FOR IMMEDIATE RELEASE

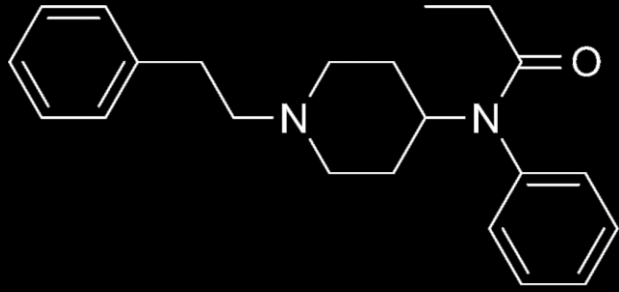
Tuesday, May 14, 2019

Flagler Beach Man Sentenced To Nearly Eleven Years In Federal Prison For Selling Benzoyl Fentanyl And Other Drugs Online



Robert Jodoin imported controlled substances (fentanyl, methamphetamine and ketamine) from outside the U.S. to sell on his website **primalvisions.net**

Multiple overdose victims around the country identified the website as their drug source.



Websites

Counterfeit

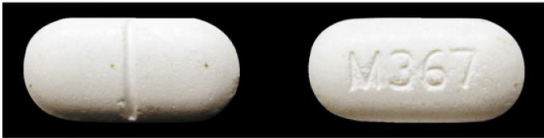


Photo courtesy of California Poison Control System, San Francisco Division

According to the DEA, this pill is a replica. Analysis of a tablet from the same batch indicated that it contained fentanyl, promethazine, acetaminophen and trace amounts of cocaine.

Real



Photo courtesy of Mallinckrodt PLC

This legitimate prescription pill made by Mallinckrodt PLC contains hydrocodone bitartrate and acetaminophen.

GENERAL NEWS

The Pill Makers Next Door: How America's Opioid Crisis Is Spreading

Ingredients for the deadly synthetic narcotic fentanyl are so easy to obtain that mom-and-pop drug labs are cropping up around the country, Breaking Bad-style

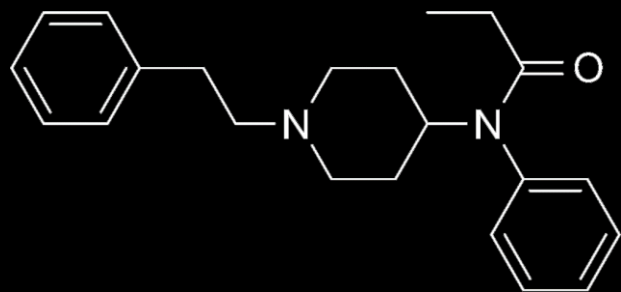


A California couple operated an illegal pill-making lab from their third-floor apartment in this San Francisco building, according to the Drug Enforcement Administration.

ILLUSTRATION: LAURA MORTON FOR THE WALL STREET JOURNAL

A San Francisco couple used a pill press to stamp at least 13,000 pills counterfeit pills containing fentanyl to look like genuine oxycodone and sell to buyers around the US.

The pills were sold online for bitcoin, shipped out of the local post office, and once payment was received, the cryptocurrency was then converted to cash through unlicensed bitcoin brokers.



Websites

Independent Websites & The Supporting Role of Social Media

E-commerce websites and marketplaces are not the only clear web platforms synthetic drug sellers use to find customers and retail products. Many vendors also operate independent websites where they list available chemicals for sale, and use social media to help build a network of clients and direct traffic to their sites.

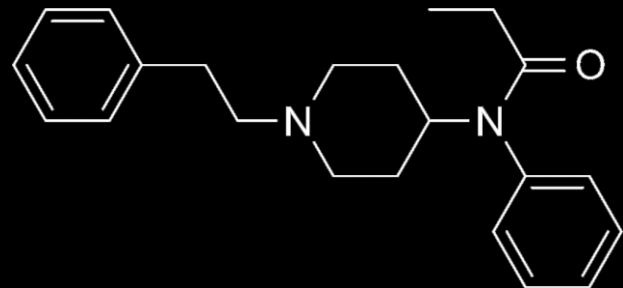
For instance, Huilitongda Biological Technology Company (HBTC) is a Chinese pharmaceutical company whose name has appeared in advertisements for fentanyl and other drugs online. We originally found an online profile for HBTC via a search for fentanyl analogues, which returned a Google Image result with a visible email address: "huilitongda.rc@gmail.com" (Figure 12)

Figure 12: The Google Image result for fentanyl analogue "Fu-F" that includes the email huilitongda.rc@gmail.com.



Figure 13: A fentanyl advertisement connected to the email huilitongda.rc@gmail.com.

Buyer / Seller	Seller
Business Type	Manufacture
Year established	2012
Employees total	11 - 50



Websites

Illegal actors use companies with U.S. nexus to operate these websites

ENOM, INC.

securechemicalstore.com

703 Pine St, San Antonio, CO 81200 | contact@securechemicalstore.com | +1 (314) 900 7970

SECURE CHEMICAL STORE

Oxycodone 30mg - 100 Tablets Per Box
 \$200.00

GODADDY.COM, LLC

drugs4saleltd.com

DRUGS STOREONLINE

Home / Pain Medication / Buy Fentanyl 75 MCG Patch Online (5Patch)

Buy Fentanyl 75 MCG Patch Online (5Patch)
~~\$330.00~~ \$300.00

NAMECHEAP INC,
intlmedshop.com

Oxycodone

Oxycodone
 \$137.00 - \$2,730.00

How it works
 Oxycodone belongs to a class of drugs called opioid agonists. A class of drugs is a group of medications that work in a similar way. These drugs are often used to treat similar conditions.

Oxycodone is similar to a group of natural substances in the brain called endorphins. These substances work to decrease the pain messages that your body sends to your brain.

NAMESILO, LLC
guaranteepharmacy.com

Order Tramadol Online

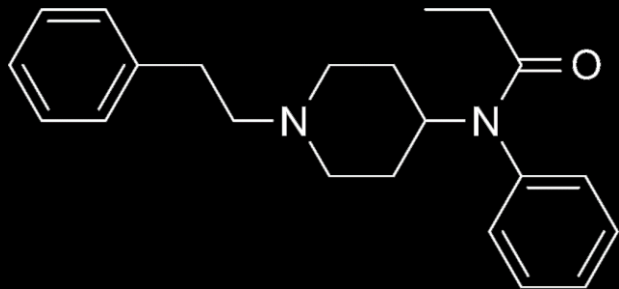
Buy Oxycotin Online - Buy Modafinil Online

Home / PAINKILLERS / Fentanyl Citrate - Actiq (Lozenges)

Fentanyl Citrate - Actiq (Lozenges)
 \$210.00 - \$390.00

Actiq - Fentanyl Citrate - Fentanyl Lollipop

https://



Social Media



Federal Authorities Announce 11 Cases Charging Alleged Drug Dealers with Providing Opioids that Led to Fatal Overdoses

Investigations by the DEA's Overdose Justice Task Force Lead to Cases in which 12 People Died, Most from Acute Fentanyl Intoxication

LOS ANGELES – Federal authorities today announced 11 criminal cases against alleged drug dealers who sold or provided narcotics to users who suffered fatal overdoses from opioids such as fentanyl or fentanyl analogues.

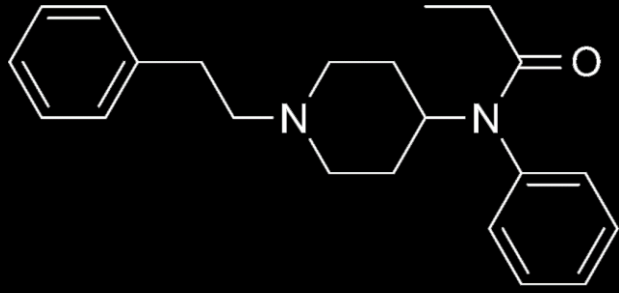
“Drug dealers who market and sell counterfeit pills via online marketplace and social media platforms may think they can hide behind technology and are absolved from responsibility, but they are not. While our actions can’t bring back a loved one, we hope that we can save other lives by putting these individuals behind bars so they can’t continue to distribute dangerous opioids in the community.”

U.S. v. Wilson

Alexander Declan Bell Wilson, 20, of Rolling Hills, was arrested Wednesday after being indicted on Tuesday on one count of distributing pills containing fentanyl that led to the death of a 15-year-old boy on May 15, 2020. Law enforcement reviewed Snapchat conversations between the two that show the victim thought he was buying oxycodone, a commonly used and widely abused semi-synthetic opioid.

U.S. v. Lopez

Edwin Lopez, 21, of Riverside, was arrested this morning on a grand jury indictment that charges him with one count related to a May 17, 2020, transaction in which he allegedly sold counterfeit oxycodone pills containing fentanyl to a 20-year-old Fontana man who suffered a fatal overdose two days later. The evidence in the case indicates that Lopez used Snapchat to negotiate the drug deal, and possibly other transactions, with the victim.



Charlie Ternan

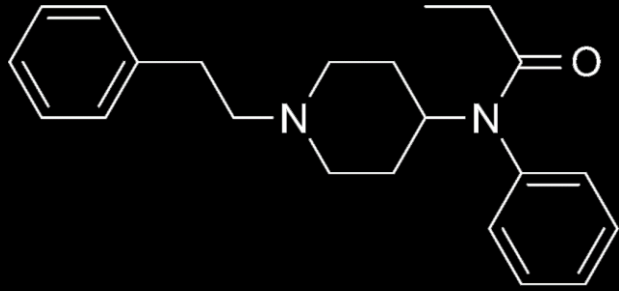
Charlie had **purchased a Percocet online** because his back was hurting. But it wasn't real. It was a **"fentapill."** We think Charlie took the pill around 3pm and died within 30 minutes. He **never had a chance.**

Social Media



Sammy Chapman

"A drug dealer connected with him on Snapchat and gave him fentanyl (sic) laced Xanax or Percocet (toxicology will tell) and he overdosed in his room. They do this because it hooks people even more and is good for business but it causes overdose and the kids don't know what they are taking."



Social Media



Arizona task force tracking apps that are becoming a DoorDash for drugs

Sponsored by TalkNowAZ.com

NICOLE CRITES
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Arizona High Intensity Drug Trafficking Area Taskforce devotes 30% of its time to Snapchat surveillance.

\$3 Million cash seized in the last three years on just those cases alone.



Drug dealers are targeting teenagers on social media platforms. A narcotics detective shares advice with parents on what to look for on kids' phones. (Sponsored by TalkNowAZ.com)

"You can find drugs on any app, like Facebook, Instagram, or TikTok."

"Snapchat could easily be identifying these accounts and contacting law enforcement"

"waiting on Snapchat to turn over what they have on accounts can take up to six weeks with a warrant and who knows how many people will overdose from those drugs hitting the streets in the meantime"

Key Applicable Laws

Laws have not kept up with criminal behavior and patient risk

Federal Laws

- Federal Food, Drug & Cosmetic Act
- Controlled Substances Act, including the Ryan Haight Act
- Customs & Border Patrol laws

State Laws

- Board of Pharmacy regulations regarding licensure and internet pharmacy practice
- Medical Board regulations regarding licensure, standards of care, and telemedicine
- State controlled substance authorities

SOLUTIONS: Supply-Side

Rubio Introduces Bill to Combat Illegal Sale of Fentanyl, Other Drugs Online

DEC 16 2021

Washington, D.C. — U.S. Senators Marco Rubio (R-FL) and Amy Klobuchar (D-MN) introduced the [Domain Reform for Unlawful Drug Sellers \(DRUGS\) Act](#) (S. 3399) to

National Telecommunications and Information Administration
United States Department of Commerce

Management
System
Telecommunication

NTIA, FDA Pilot Program to Curb Access to Illegal Opioids Online Delivers Promising Results

January 19, 2021 by Jasna Wray, Associate Administrator, Office of International Affairs
NTIA and the U.S. Food and Drug Administration (FDA) have successfully concluded a "trusted notifier" pilot program to curb access to illegal online opioid sales by working with domain name registries. A trusted notifier is generally recognized by a registry or registrar for providing credible and accurate information about illegal or abusive website content to domain name registries and/or registrars.

The new working relationships created through the program led to nearly 30 domain names associated with websites that were offering misbranded and/or unapproved opioids for sale to U.S. consumers being rendered inaccessible via the Domain Name System. The pilot also yielded valuable insights into potential mechanisms to help in the fight against the opioid crisis.

The Department of Commerce and the Department of Health and Human Services (HHS) in June announced the **voluntary, 120-day pilot program**, conducted in cooperation with three U.S. domain name registries: Verisign, Registry Services, LLC (formerly Neustar Registry Services), and Public Interest Registry.

JOEMANCHIN

ABOUT

NEWSROOM

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NEWSROOM / PRESS RELEASES

SEPTEMBER 29, 2020

MANCHIN, CORNYN BILL TO REQUIRE COMPANIES REPORT ILLICIT ONLINE DRUG SALES

Washington, DC – Today, U.S. Senators Joe Manchin (D-WV) and John Cornyn (R-TX) introduced the *See Something, Say Something Online Act* to stop the illicit sale of opioids and other drugs online by amending Section 230 of the Communications Decency Act to require companies report illegal activity on their online platforms.

Nadler, Johnson, Issa & Cline Introduce Bipartisan SHOP SAFE Act House Judiciary Committee to Hold Hearing on SHOP SAFE Act on May 27th

MARCH 23, 2021

Durbin, Cassidy, Grassley, Hirono, Coons, Tillis Introduce Bill to Ensure Greater Transparency for Third-Party Sellers of Consumer Products Online

WASHINGTON – U.S. Senators Dick Durbin (D-IL) and Bill Cassidy, M.D. (R-LA) today introduced legislation to combat the online sale of stolen, counterfeit, and dangerous consumer products by ensuring transparency of high-volume third-party sellers in online retail marketplaces. *The Integrity, Notification, and Fairness in Online Retail Marketplaces for Consumers (INFORM Consumers) Act* would direct

SOLUTIONS: Demand-Side



BUY SAFELY

Beware of fraudulent and unsafe prescription medication sold on websites.
Only buy prescription medication from legitimate, verified pharmacies.

Search for a website to see if it is safe or not recommended:

www.example.com



Download an Excel list of safe pharmacy websites, or email custserv@safe.pharmacy to request the list in another format.

✓ Accreditation requirements for online payment processing and advertising

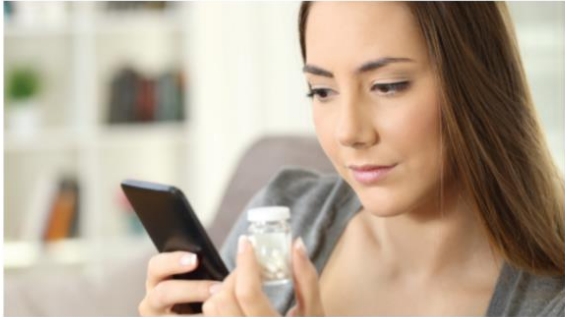
✓ Consumer education embedded in search results

SOLUTIONS: Demand-Side




BeSafeRx: Your Source for Online Pharmacy Information

Learn more about online pharmacy safety:



[Considering an Online Pharmacy?](#)

Learn how to recognize the signs of safe online pharmacies and the warning signs of websites that appear to be pharmacies but may be unsafe.

 Gathering of diverse people on their phones

[Resources for Consumers](#)

Additional resources for online pharmacy



[Locate a State-Licensed Online Pharmacy](#)

Look up a state-licensed online pharmacy.

 Couple with their doctor

[Resources for Health Professionals](#)

Tools to help health professionals educate

SOLUTIONS: Demand-Side

ASOP GLOBAL | ALLIANCE FOR SAFE ONLINE PHARMACIES

www.BuySafeRx.pharmacy

BUYING MEDICINE?

How to Stay Safe & Save Money

1 | **Talk to your healthcare professional** about how & where to buy medicine safely



3 | **Shop around** - not every pharmacy sells medicine at the same price

2 | **Use prescription services** like GoodRx, RefillWise & NeedyMeds to help find discounts & the lowest price at local pharmacies

4 | **Look for .pharmacy in the website address** to make sure your online pharmacy is safe & verified by the National Association of Boards of Pharmacy

5 | **Visit BuySafeRX.pharmacy** to learn more about how to stay safe & save money when buying medicine in stores or online

ASOP GLOBAL | ALLIANCE FOR SAFE ONLINE PHARMACIES

#staySAFEandSAVE

Find Safe Online Pharmacies in the U.S.

With more than 33,000 illegal online pharmacies, ASOP Global is dedicated to helping consumers stay safe online. To ensure the online pharmacy sites you visit are safe and legitimate, use the LegitScript URL verification tool or search the National Association of Boards of Pharmacy's database of verified .pharmacy websites.

LegitScript's Verification Program

LegitScript maintains the world's largest comprehensive database of regulated healthcare products, organized by legitimacy and safety. LegitScript monitors and catalogs warnings from over 100 government agencies on an on-going basis and follows regulatory developments in nearly 20 countries around the world.

NABP's .Pharmacy Program

The .pharmacy verified domain, established by NABP, creates a safe space for consumers throughout the world to purchase medicine online, while enabling businesses to show that their websites are trustworthy. Unlike seals of approval posted on websites, the .pharmacy domain is part of a website's address and cannot be faked.

Verify your online pharmacy

Powered by:  LegitScript

 pharmacy

With .pharmacy in the URL, the National Association of Boards of Pharmacy "seal of quality" is built into the website address.
Find an NABP-approved .pharmacy website

ASOP GLOBAL | ALLIANCE FOR SAFE ONLINE PHARMACIES

www.ASOPFoundation.pharmacy

TAKEAWAY: What Can State Regulators Do?

1. Work with Congress on New Federal Laws

1. **Illegal websites** → *Domain Reform for Unlawful Drug Sellers (DRUGS) Act (S. 3399 / H.R. 6352)*

- Go to www.BuySafeRx.Pharmacy to send a letter to your members of Congress
- Support DEA permanently authorizing and regulating legal telemedicine involving controlled substances → DEA regulations under the Ryan Haight Act

2. **Social media accountability** → *See Something, Say Something Act (S. 27); Section 230 Reform*

3. **Online marketplace transparency** → *INFORM Consumers (S.936); SHOP SAFE (H.R. 3429)*

TAKEAWAY: What Can State Regulators Do?

2. Update Your Own State Laws & Regulations

- Distinguish between legal telemedicine vs. illegal online drug sales in regulation
- Require entities dispensing medicine in your state to be accredited by NABP's .Pharmacy Program or other trusted party

3. Support Public Awareness & Education

- Educate your colleagues and community
Articles, fact-sheets, infographics available from ASOP Global and NABP
- Tell your trade association and/or me that you'd like to help

Where to Get More Information

For Policy Solutions: www.BuySafeRx.Pharmacy

For Provider Tools & Research: www.ASOPfoundation.Pharmacy

For Regulator Education: www.NABP.Pharmacy

Thank You!



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