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TESTIMONY BEFORE THE COMMITTEE ON THE JUDICIARY, SUBCOMMITTEE ON CRIME, TERRORISM, AND HOMELAND SECURITY

Hearing on Online Pharmacies and the Problem of Internet Drug Abuse
June 24, 2008

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Executive Director**

Mr. Chairman and members of the Subcommittee, it is my pleasure to submit this written testimony that will outline our experiences with some Internet drug dealers masquerading as legitimate Internet pharmacies, and the problems that the states have faced in dealing with those who are operating illegally, using Ohio as an example. I will also describe some independent processes that have been started to attempt to deal with this problem and provide you with my opinion of things that Congress can do to help us resolve these issues.

Introduction

By way of introduction, the Ohio State Board of Pharmacy was established by the Ohio Legislature in May of 1884 and has been in continuous service to the citizens of Ohio since that time. The duties of the Board have grown over the years and, at this time, encompass the enforcement of the following chapters in the Ohio Revised Code:

2925. – Criminal Drug Laws

3715.– Pure Food and Drug Law

3719. – Controlled Substance Act

4729. – Pharmacy Practice Act & Dangerous Drug Distribution Act

The State Board of Pharmacy consists of nine members (eight pharmacists and one public member) appointed by the Governor to serve four year terms. Each member may be re-appointed one time at the Governor's discretion.

Like all other professional licensing boards, the Ohio State Board of Pharmacy is responsible for the licensing of the professionals that practice under the Board's authority. In our case, this includes pharmacists and pharmacy interns. In addition, the Board licenses sites where Dangerous Drugs (primarily those requiring a prescription) are purchased and stored prior to the delivery to a patient. The site licenses are issued by the Board as either a Terminal Distributor of Dangerous Drugs (mainly retail type settings) or a Wholesale Distributor of Dangerous Drugs. Terminal Distributor sites include, but are not limited to, retail pharmacies, hospitals, nursing homes, prisons and jails, emergency medical squads, clinics, medical gas distributors, etc.

In addition to the licensing function just discussed, the Ohio State Board of Pharmacy is also a law enforcement agency, unlike most other licensing boards around the country.

Until recently, we were the only agency in Ohio that had statewide jurisdiction to enforce the criminal drug laws. Therefore, we have conducted criminal investigations of doctors, nurses, dentists, veterinarians, and other individuals far removed from our licensing functions as outlined above.

As an example, in the last seven years (January, 2001-December, 2007), agents of the Board of Pharmacy conducted investigations leading to the arrest of over 750 professional individuals for violations of the criminal drug laws, including:

Pharmacists (RPh)	128
Pharmacy technicians	109
Pharmacy Interns	7
Registered Nurses (RN)	286
Licensed Practical Nurses (LPN)	184
Physicians (MD or DO)	46
Dentists (DDS)	7
Certified RN Anesthetists (CRNA)	5
Police Officers	4
Medical Assistants	10

It is our law enforcement activities that lead to this written testimony. We have completed several investigations involving Internet transactions and it is interesting how the process has changed and become more difficult and expensive to investigate and prosecute over the years.

Ohio's History With Internet Drugs

Our first experience with Internet drug trafficking was in 1998. We became aware that a doctor in the Columbus, Ohio area had set up his own website, www.get-it-on.com, where lifestyle drugs and controlled substances could be obtained by means of an on-line questionnaire. In one of the first cases of this type in the country, we investigated the doctor, Dr. Daniel Thompson, and his partner, Vincent Chabra. As far as I know, this was also the first investigation in the country to buy controlled substances for a cat. We did this to prove the inability of the physician to determine the legitimacy of the patient with his on-line questionnaire without a physical examination. Drugs were being shipped all over the country from this one company and its website. After our investigation, the doctor and the company were indicted. The doctor was indicted on 64 felony counts of illegal drug sales (both controlled substances and non-controlled substances).

Unfortunately, right before the trial was to begin and immediately after a motions hearing where the defense attorney told the judge that he could not defend his client against the charges since he had just lost on every motion he made, the elected county prosecutor stepped in. Over lunch with the defense attorney between the motions hearing in the morning and jury selection in the afternoon, he made a deal with the defense attorney. Dr. Thompson was allowed to plead to two misdemeanors instead of going to trial on the 64 felony counts. The Prosecutor made this deal without consulting with the Assistant Prosecutor handling the case, the attorney from the Pharmacy Board who had been appointed special prosecutor to assist in the case, or the Board investigators. Therefore, Dr. Thompson and Vincent Chabra were free to go on their way to bigger and better things. It's my understanding that both Vincent Chabra and Dr. Thompson had dealings

with DEA and other agencies a few years later for the same type of activities. I believe that Chabra surrendered about \$130 million from off-shore accounts as part of his federal settlement. That's a lot of illegal drug sales that might have been prevented had the Prosecutor in our case done his job.

After it became obvious that a company with an on-line questionnaire who also provided the drugs was too easy for investigators to track, the Internet drug traffickers modified their techniques. They began using multiple websites with apparently unrelated domain names that all fed back to one company. This company would then contract with physicians to review the questionnaires and sign off on prescriptions, paying them by the prescription. These "prescriptions" would then be transmitted to a pharmacy that was either owned by the Internet company or contracted to them. In some cases, like our next Internet case, the companies even went so far as to contract with doctors who were licensed in the state where the person requesting drugs was located. The doctor never saw the patient, although in some cases there were very short telephone conversations between the doctor and the person requesting drugs before the doctor approved the prescription. Rarely, if ever, did these conversations result in the doctor refusing to issue a prescription.

Since it was extremely difficult to identify and link the various websites with the company behind the scheme (to say nothing about the doctors, pharmacies, and patients involved with them), and since we had limited resources, we did not pursue any more Internet cases for some time. However, in May of 2000, we became aware of a pharmacy that was shipping drugs into Ohio and one of our agents managed to buy some drugs. The pharmacy (website address www.1stonlinepharmacy.com) was in North Carolina and the doctor, Warrick Barrett, MD who was also licensed in Ohio, was in Indiana. The pharmacy was actually licensed with Ohio, as well as several other states. They were operating under the guise of a legitimate mail order pharmacy. In a settlement with us, they surrendered their Ohio license and agreed to refrain from shipping drugs to Ohio or pursuing any further licensure until they were able and willing to function legally. The State Medical Board of Ohio revoked the doctor's Ohio medical license.

In the latest change that we have seen, the Internet companies are now contracting with local pharmacies (usually independent, not chain pharmacies) to fill the prescriptions. We have recently had two cases involving Ohio pharmacies who were filling prescriptions written by doctors from another state for patients living in a third state. Pharmacies in Ohio and, I assume, other states are being bombarded with offers from companies looking for someone to fill "legitimate" prescriptions. The pharmacists are being offered a significant dispensing fee, far higher than they normally make, to fill these prescriptions. While most pharmacists realize the illegal nature of these transactions, we have unfortunately found several who have agreed to participate. We have had two Board hearings so far, but there are several other active investigations going on at this time.

Based on our investigation of Caringwell Pharmacy, located in Columbus, Ohio, and its owner, Jae-Seung Lee, R.Ph., the Board found that the pharmacist sold the following amounts of drugs by filling illegal prescriptions from the Internet between November 29, 2006, through March 29, 2007, a period of 120 days:

CONTROLLED SUBSTANCE	# of Rxs	QTY. OF DRUG
hydrocodone/APAP 10/325 mg tablets	3,231	348,480
hydrocodone/APAP 10/500 mg tablets	1,412	154,336
hydrocodone/APAP 7.5/500 mg tablets	109	11,010
hydrocodone/APAP 7.5/750 mg tablets	193	19,530
hydrocodone/APAP 10/650 mg tablets	550	62,570
hydrocodone/ APAP 10/660 mg tablets	15	1,800
TOTAL hydrocodone products	5,510	597,726
alprazolam 1 mg tablets	82	6,330
alprazolam 2 mg tablets	527	46,890
TOTAL alprazolam products	609	53,220
diazepam 10 mg tablets	205	16,265

Please note that hydrocodone/APAP is the generic name for products such as Vicodin, Lortab, Norco, etc. Alprazolam is the generic name for Xanax and diazepam is the generic name for Valium.

The Board revoked the pharmacist's license and the pharmacy's license.

We also investigated Stoltz Leader Drug, located in Nelsonville, Ohio, and its owner, Steven Holtel. After hearing about our investigation, the Board revoked Holtel's pharmacist license for filling Internet prescriptions during the time period of October 17, 2005, through February 14, 2006. The following table lists only the hydrocodone containing prescriptions filled, although there were many prescriptions filled for other drugs as well.

Drug	Strength	# of Rxs	QTY. OF DRUG
hydrocodone/APAP	10/500	1,815	169,680
hydrocodone/APAP	10/650	553	52,020
hydrocodone/APAP	5/500	1,795	9,870
hydrocodone/APAP	7.5/500	623	54,060
hydrocodone/APAP	7.5/750	924	79,590
hydrocodone/APAP	10/325	3,180	296,280
hydrocodone/ibuprofen	7.5/200	98	9,270
Total hydrocodone products		8,988	670,770

Both of these pharmacies were small, independent pharmacies. However, they were shipping these large quantities of controlled substances to individuals all over the country. In most cases, the doctor, patient, and pharmacy were all separated by large distances. There were no physical examinations, there was no valid doctor-patient relationship, there was no valid pharmacist-patient relationship.

These were just two small pharmacies in Ohio. We will have more pharmacies to add to our list soon. I know from talking to my colleagues from around the country that Ohio is not unique; this is taking place all over the country. The amount of controlled substances being sold illegally must be staggering. Something needs to be done soon.

Please note that all of our cases have involved people and companies located within the United States. Even though websites and drug sales emanating from foreign countries are

a large part of the problem, we cannot deal with those sites. That will take a concerted federal effort by DEA, FDA, Customs, and other federal agencies.

Current Efforts To Combat The Problem

Currently, the National Association of Boards of Pharmacy (NABP), whose membership is made up of all of the Boards of Pharmacy in each state and territory plus several Pharmacy Boards from outside of the U.S., has two programs operating to help consumers determine whether the website offering to sell them prescription drugs is legitimate. These programs are the Verified Internet Pharmacy Practice Sites (VIPPS) and the Internet Drug Outlet Identification Program. On the NABP website (www.nabp.net) is a selection for "Internet Pharmacies" which will take the reader to a page with a header that reads: **Buying Medicine Online -How do I decide which pharmacy to use?**

By reading about the VIPPS program and by reviewing the list of suspect Internet sites, it is hoped that consumers will be able to make a more informed choice when they choose their Internet pharmacy.

Documentation describing these two programs is attached to this testimony as Addendum 1. It should be noted that NABP started the Internet Drug Outlet Identification Program without any outside funding after learning about the serious problems faced by consumers and regulators alike when they were trying to deal with the large number of Internet drug sites and determine which were legitimate and which were not. A review of the list of questionable sites will reinforce the need for federal action to provide DEA, FDA, other federal agencies, and the States with the tools needed to deal with this proliferation of drug dealing websites.

REQUEST FOR FEDERAL ASSISTANCE

Currently, the federal laws and regulations that exist do not go far enough to deal with this problem effectively. State laws and rules vary widely, see Addendum 2 for some of Ohio's current laws and rules, which has led to some states almost seeming to be safe havens for the people operating these websites. The changes proposed in Senate Bill 980 would go a long way to remedying that problem. Much of the wording of this bill is very close to language already existing in several states. By making this change federally, federal agencies will be able to operate effectively even in states that have weak laws and rules or no laws or rules on this topic at all. This bill would give the federal agencies more ability to stop these websites from operating and would also provide a better chance of getting consistent and better prosecution if they persist.

Having appropriate laws in place is not enough, however. In order to enforce the laws, it takes personnel, equipment, and expertise. In addition to strengthening the laws that deal with the problem, Congress needs to allocate adequate funding to the various agencies involved in the enforcement of these new laws. While the states can often conduct their own investigations, resources are even more limited on that level. Cooperation between the states and the federal agencies would be very beneficial to resolving this issue.

Ohio Testimony - Addendum 1

NABP's Verified Internet Pharmacy Practice Site program and Internet Drug Outlet Identification Program

VIPPS

In response to public concern of the safety of pharmacy practices on the Internet, the Association developed the Verified Internet Pharmacy Practice Sites (VIPPS) program in the spring of 1999. A coalition of state and federal regulatory associations, professional associations, and consumer advocacy groups provided their expertise in developing the criteria that VIPPS-accredited pharmacies follow.

To be VIPPS accredited, a pharmacy must comply with the licensing and survey requirements of their state and each state to which they dispense pharmaceuticals. In addition, pharmacies displaying the VIPPS seal have demonstrated to NABP compliance with VIPPS criteria including patient rights to privacy, authentication and security of prescription orders, adherence to a recognized quality assurance policy, and provision of meaningful consultation between patients and pharmacists.

VIPPS pharmacy sites are identified by the VIPPS hyperlink seal displayed on their Web sites. By clicking on the seal, a visitor is linked to the NABP VIPPS site where verified information about the pharmacy is maintained by NABP. The public is also welcome to access the VIPPS site to search for a VIPPS Internet pharmacy that matches their needs.



Recommended Internet Pharmacies

Web Business Name	Web Site Address
Caremark.com	www.caremark.com
DrugSource, Inc	www.drugsourceinc.com
drugstore.com	www.drugstore.com
Familymeds.com	www.Familymeds.com
HOOK SUPERX, Inc, dba CVS/pharmacy	www.cvs.com
Liberty Medical Supply, Inc	www.libertymedical.com
Medco Health Solutions, Inc	www.medco.com
Prescription Solutions	www.rxsolutions.com
Prime Therapeutics, LLC	www.primetherapeutics.com
Rx Direct, Inc	www.rxdirect.com
Savon.com	www.savon.com
Tel-Drug, Inc/CIGNA	www.teldrug.com
Walgreen Co	www.walgreens.com
WellDyneRx	www.welldynerx.com
WellPoint NextRx	www.wellpointnextrx.com



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Internet Drug Outlet Identification Program

**Progress Report for State and
Federal Regulatory Bodies:
June 2, 2008**

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INTERNET DRUG OUTLET IDENTIFICATION PROGRAM PROGRESS REPORT: JUNE 2, 2008

I. INTRODUCTION

NABP is pleased to announce that our Internet Drug Outlet Identification program is well under way. The new Internet Pharmacies section of the NABP Web site went live on May 16, 2008, its primary purpose, to educate patients on the potential dangers of buying medicine online and empowering them to make informed choices. As of May 29, the Web site lists 139 Internet drug outlets that appear to be out of compliance with state and federal laws or NABP patient safety and pharmacy practice standards, thereby posing a significant risk to the public health.

II. OBJECTIVE

The main objective of this program is to review and monitor Web sites selling prescription drugs and to distinguish those sites that do, and do not, comply with state and federal laws and/or NABP patient safety and pharmacy practice standards. NABP has developed these standards with input from several industry, professional, and regulatory groups, including the US Food and Drug Administration (FDA) and the US Drug Enforcement Administration (DEA). Internet drug outlets that appear to operate in conflict with these criteria are listed on the NABP Web site as “not recommended.”

At this time, NABP recommends that patients buying medicine online use only Internet pharmacies accredited through the Verified Internet Pharmacy Practice Sites™ (VIPPS®) program. NABP has verified that these pharmacies are appropriately licensed and have successfully completed the well-recognized and rigorous VIPPS criteria evaluation and on-site inspection. These pharmacies, representing more than 12,000 pharmacies, are listed on the NABP Web site as “recommended.” These lists, along with program criteria and related patient information, are accessible in the new Internet Pharmacies section of the NABP Web site, www.nabp.net. The program criteria are also included as Appendix A of this report.

III. RESULTS

As of May 29, NABP has conducted initial reviews and, via a subsequent review, verified its findings on 148 Internet drug outlets selling prescription medications. Of these 148 sites, 139 (94%) appear to be in conflict with state and federal laws and NABP patient safety and pharmacy practice standards. These sites are listed as “not recommended” on the NABP Web site. Complete findings on these sites are included in Appendix B of this report (see attached spreadsheet). Only nine (6%) of those 148 sites have been found to be potentially legitimate, pending verification of licensure and other criteria.

NABP has identified another 317 suspiciously operating Internet drug outlets and is in the process of verifying its findings before posting these sites to the “not recommended” list. Staff has identified another six potentially legitimate sites and, likewise, is in the process of verifying these findings.

The 139 Internet drug outlets currently listed as “not recommended” on the NABP Web site are characterized as follows:

- 61 have a physical address located outside of the United States
- 128 do not require a valid prescription
- 65 offer foreign or non-FDA-approved drugs
- 114 do not offer medical consult with a pharmacist
- 39 do not have secure sites
- 131 do not accept insurance
- 39 have server locations in foreign countries
- 84 appear to be affiliated with a network
- 62 dispense controlled substances
- 39 sell precursor products

Potentially legitimate sites appear to meet program criteria that could be verified solely by looking at the site. Staff has not verified licensure or DEA registration or requested attestation of compliance with the remaining criteria for any potentially legitimate sites at this time. These sites are not posted on the NABP Web site.

Sites encountered that appear to sell only over-the-counter products or herbal supplements, that are displayed in an indecipherable foreign language, or that

appear to be based in a foreign country and not selling prescription medications to customers in the United States have been deferred for possible review at a later date.

NABP obtained leads for the sites we have reviewed thus far from the following sources:

- PayPal: PayPal sends NABP lists of suspiciously operating Internet drug outlets and related Web sites based on customer complaints
- Suspicious sites compiled from 2001-2004: Information on these sites was obtained by NABP staff in previous years. Staff revisited these sites (a) to see if they still exist, and (b) to evaluate them according to current program criteria.
- Customer inquiries and Report a Site: These suspiciously operating sites were reported by customers either to Customer Service staff or via the electronic "Report a Site" tool on the NABP Web site.
- Google key-word search for common prescription drugs of abuse
- Unsolicited e-mail messages (ie, spam) advertising Internet drug outlets
- February 2008 *Ohio State Board of Pharmacy Newsletter*
- Pfizer news release, "Microsoft and Pfizer Target Sellers of Illegal Generic Viagra and International Pharmacy Spam Rings," describing legal proceedings in which Pfizer is suing Internet drug distributors for selling fraudulent versions of its brand-name drug
- Reverse IP look-ups (search conducted using a Web site's IP address or domain name that provides a listing of all sites hosted on the same IP address)
- Internet drug outlets named on previously reviewed Web sites

In our research, NABP staff continues to come across many sites that appear to be affiliates of one another. For example:

- Twenty-one sites are subsidiaries of Alliance Health Group/Handy Healthcare Group;

- Twenty-eight sites appear to be affiliates of Health Network Solutions LLC/Millennium Pharmaceuticals;
- Five sites appear to be affiliated with Trusted Tab/Trusted Tabs;
- Fourteen sites appear to be affiliates operating with 877-479-2455 listed as the toll-free number;
- Twelve sites appear to be affiliates of UltraMeds;
- Thirty-one sites appear to be affiliates with DesktopDrugs;
- Five sites appear to be affiliates of Real-medical.com;
- Ten sites appear to be affiliates of CanadaMeds;
- Six sites appear to be affiliates of Secure Medical; and
- Nine sites appear to be affiliates of UnitedPharmacies

NABP will investigate these networks of affiliated rogue sites and will provide further information in a future report.

IV. DISCUSSION

NABP will continue evaluating Internet drug outlets and will continue to list sites that appear to be in conflict with state and federal laws and NABP patient safety and pharmacy practice standards as “not recommended” on the NABP Web site. We also will provide the boards of pharmacy, federal regulatory agencies, and other interested stakeholders with periodic updates of our findings. Our hope is that regulators will find the information helpful in their efforts to crack down on illegally operating Internet drug outlets. We also welcome any partnership opportunities to help us spread the word to the public about the potential dangers of buying medicine online and about the information available on the NABP Web site, *www.nabp.net*.

In addition, we ask that you share with NABP any knowledge or concerns you might have pertaining to illegally or unprofessionally operating Internet drug outlets, so that we may pass this information along to the public, as well as to the state and federal regulatory bodies and interested stakeholders. By working in concert, we can make considerable progress toward curbing the illegal trade

of prescription drugs and protecting the public health from illegal operators of Internet drug outlets.

For further information, please contact Melissa Madigan, Policy and Communications Senior Manager, via e-mail at mmadigan@nabp.net or by phone at 847-375-4487.

APPENDICES

APPENDIX A (CONT.)

Internet Drug Outlet Identification Program Criteria

Patient Safety and Pharmacy Practice Standards

Licensure and Residency

1. The pharmacy, in accordance with applicable state and federal laws and regulations, must be licensed or registered in good standing to operate a pharmacy or engage in the practice of pharmacy in all applicable jurisdictions.
2. The pharmacy, in accordance with applicable state and federal laws and regulations, must not be or not have been subject to significant disciplinary action.
3. The pharmacy, in accordance with applicable state and federal laws and regulations, must be registered with Drug Enforcement Administration (DEA) if dispensing controlled substances.
4. The pharmacy, in accordance with applicable state and federal laws and regulations, must be domiciled in the United States.

Prescriptions

5. The pharmacy, in accordance with applicable state and federal laws and regulations, must assure the legitimacy and authenticity of all prescription drug orders. A legitimate and authentic prescription drug order must be based upon a valid patient-prescriber relationship, which requires the following to have been established: a) The patient has a legitimate medical complaint; b) A face-to-face physical examination adequate to establish the legitimacy of the medical complaint has been performed by the prescribing practitioner or in the instances of telemedicine through a telemedicine practice approved by the appropriate Practitioner Board; and c) Some logical connection exists between the medical complaint, the medical history, and the physical examination and the drug prescribed.
6. The pharmacy, in accordance with applicable state and federal laws and regulations, must adhere to the Federal Controlled Substances Act and DEA rules regarding prescriptions for controlled substances, including but not limited to the following: a) Prescriptions for Schedule II controlled substances must be provided in writing by the prescriber; b) Prescriptions for Schedule III - V controlled substances must be provided in writing by the patient or prescriber, or verbally or by facsimile by the prescriber; c) Schedule II controlled substance prescriptions may not be refilled; a new prescription must be issued for each quantity of the substance.
7. The pharmacy, in accordance with applicable state and federal laws and regulations, must *not* dispense or offer prescriptions originating from telephonic, electronic, or online medical consultations without a pre-existing

patient-prescriber relationship that has included a face to face physical examination.

8. The pharmacy, in accordance with applicable state and federal laws and regulations must *not* offer to dispense or dispense medications that have not been approved by FDA.

Patient Privacy

9. The pharmacy, in accordance with applicable state and federal laws and regulations, must maintain a secure Web site and ensure patient identifiable information and prescription transactions are encrypted per industry standards.
10. The pharmacy, in accordance with applicable state and federal laws and regulations must have and provide patients with a statement of patients' rights to privacy and attempt to obtain from patients signed confirmation of receipt of such statement.

Patient Services

11. The pharmacy must provide, on the Web site, a 24-hour toll free number for patients who experience or believe they have experienced an adverse event involving their medication.
12. The pharmacy must provide, on the Web site, the US street address of the pharmacy that dispenses prescription medications on behalf of (or through) the Web site.
13. The pharmacy must provide, on the Web site, the US street address of the site's corporate headquarters or primary place of business.
14. The pharmacy must provide, on the Web site, instructions to patients describing how to submit complaints or concerns.
15. The pharmacy must offer pharmacist medication consultation via secure means through the Web site, via telephone, or in person for walk-in patients.

Professional Practices

16. The pharmacy must attest and provide documentation to NABP that they obtain medications from US licensed wholesale drug distributors and/or US licensed or FDA registered pharmaceutical manufacturers.
17. The pharmacy must maintain a currently registered domain name that is not anonymous or private.

APPENDIX B

Internet Drug Outlets Evaluated and Listed as 'Not Recommended'

Not Recommended Sites : These Internet drug outlets appear to be out of compliance with state and federal laws or NABP patient safety and pharmacy practice [standards](#).

Not Recommended Sites

Web Business Name

1 Stop Pharmacy
trusted.com
111 Drugstore.com
1800-Viagra.com
1drugstore-online.com
24HoursPPC
4Rx.com
4Rx.com
800-MEDS
800-Pharmacy.com
90-day Supply
ABCOnline Pharmacy
AccessRx
Aclepsa.com
Aclepsa.com
AdvCare Pharmacy
AFFORDAPHARMA
AlliedPharmaWorld
America Pharmacy World
America1rx.com
American Drug Club
American Nutrition Inc.
Americanameds.com
Anabolic Labs
Anabolics Supplementary
Anabolics-Supplements.com
Anabolics-supplement.com
ApexRx.com
Avoidmiddleman.com
BM Pharmacy
Bodybuilding.com
BolixHolix
Burrendah Pharmacy
Buy Viagra Online
BuyDeca Durabolin
Buyephedraonline.com

Web Site Address

http://1stop-pharmacy.e-
www.111drugstore.com
www.1800-viagra.com
www.1drugstore-online.com
www.24hoursppc.org
www.worldexpressrx.com
www.4rx.com
www.800-meds.com
www.800-pharmacy.com
www.90-daysupply.com
www.abconlinepharmacy.com
www.blue-pill.com
www.bigmeds.com
www.privatepills.com
www.coloradomeds.com
www.radiomeds.com
www.consumermeds.com
www.peoplemeds.com
www.tvmeds.com
www.medstoday.com
www.accessrx.com
www.aclepsa.com
www.viagraclones.com
www.adv-care.com
www.affordapharma.com
www.alliedpharmaworld.com
www.americapharmacyworld.com
www.america1rx.com
www.americandrugclub.com
www.americannutrition.com
www.americanameds.com
www.anaboliclabs.co.uk
www.anabolics-steroid.net
www.synthetic-androgen.com
www.anabolic-supplement.com
www.pilldrugstore.com
www.avoidmiddleman.com
www.budgetmedicines.com
www.bodybuilding.com/store
www.bolixholix.com
www.burrendahpharmacy.com
www.buy-viagraonline.com
http://buydecadurabolin.com
www.buyephedraonline.com

BZPSupply.com	http://bzpsupply.com
Canada Discount Rx	www.canadascript.com
Canada Drugs	www.canadadrugs.com
Canada Drugs	www.smartmed.ca
Canada Drugs	www.pharmacycan.com
Canada Drugs	www.libertymeds.com
Canada Drugs	www.economicalrx.com
Canada Drugs	www.directpharmacyrx.com
Canada Drugs	www.usapharmacy.com
Canada Drugs	www.redwooddrugs.com
Canada Drugs	www.rx1.biz
Canada Drugs	www.rxcarecanada.com
Canada Drugs	www.valuemartpharmacy.com
Canada Drugs	www.pricemartpharmacy.com
Canada Drugs	www.universalmeds.com
Canada Drugs	www.europeanmeds.com
Canada Drugs	www.onlinerxdrugstore.com
Canada Drugs	www.rxnorth.com
Canada Drugs	www.onlinecanadiadrugstore.com
Canada Pharmacy	www.canadapharmacy.com
Canadian Meds World	www.canadianmedsworld.com
Canadian Pharmacy	www.l-pharmacy24.com
Canadian Pharmacy	www.simple-op.com/index.php
CheapDrugs.com, CheapMeds.com	www.cheapmeds.com
CheapDrugs.com, CheapMeds.com	www.cheapdrugstoday.com
Cipro Pharmacy.com	www.cipropharmacy.com
CrazyMuscle.com	www.crazymuscle.com
Cross Border Pharmacy	www.affordableprescriptions.com
Cross Border Pharmacy	www.crossborderpharmacy.com
CutPriceChemist.com	www.cutpricechemist.com
Cybermedsrx.com	http://www.cybermedsrx.com
Desktop Pills	www.desktoptills.com
DirectDocLink.com	www.directdoclink.com
Discount Drugs from Canada	www.discountdrugsfromcanada.com
DISCREET-PHARMACY.com	www.discreet-pharmacy.com
DoctorSolve	www.doctorsolve.com
dotcomScripts.com	www.dotcomscripts.com
dotdrugstore.com	www.dotdrugstore.com
DrugsFromCanada.com - Prescriptions Direct	www.drugsfromcanada.com
DrugsWell	http://www.drugswell.com
E Prescribe	www.eprescribe.com
E3R Information System Pvt. Ltd.	www.1vermainfo.e-trusted.com
Easierrxmeds.com	www.easierrxmeds.com
Easy MD	www.discount-rx.net
elegalhighs.com	www.elegalhighs.com
Elitepharmashop	http://www.elite-pharmashop.com
e-Pharmacy	www.e-pharmacy.com
Eprescriptions.com	www.eprescriptions.com
Eprescriptions.com	www.americanpharmacy.com
European Rx Pharmacy	www.europeanrxpharmacy.com
EverythingPills.com	http://www.everythingpills.com
Express Pharmacy	www.express.expresspharmacyonline.com
e.com	

EzDocLink.com
EzDocOnline.com
EzMedLink.com
EzPharmaLink.com
Finpecia/Generic Finasteride
FitnessMed.net
Freedom-Pharmacy.com
FrontierPharmacies.com
FrontierPharmacies.com
Generic-Pharmacy.net
genuinegenerics
Gererics.ws
Group-Rx.com
Guaranteed Supplements.com
HBEES
Health Solutions Network
Hello Pharmacy.com
Imperialpills.com
International Antiaging Systems Ltd
(IAS Offshore Pharmacy)
Israel Online Meds
just ephedrine

drine
KIMS Pharmacy
Littlebluepill.net
LowCostMeds24-7.com
Main Meds Online.com
Main Meds Online.com
MedHaven.net
Medical Discounts International Inc.
MedicalTouch.net
MedPrescribe.com
Meds Discount
MedStore
MedzOnline.com
MexicoRXstore.com
mexmeds4you.com

asp
MK Medical Services
My Pharma Stop
MyDrugstorePlus
MyFirstPharma
MyPharmaCentral
MyPharmaNow
MyPharmaOne
MyRxScripts
MySaveMeds.com
neopills
NetPrescribe.com
NoPrescriptionPharma.com
Offshore Pharmacy
Online Health Pharmacy

www.ezdoclink.com
www.ezdoonline.com
www.ezmedlink.com
www.ezpharmalink.com
http://generic-finasteride.tripod.com
www.fitnessmed.net
www.freedom-pharmacy.com
www.frontierpharmacies.com
www.feelingfattooday.com
www.generic-pharmacy.net
www.genuinegenerics.com
www.generics.ws
www.group-rx.com
www.guaranteedsupplements.com
www.hbees.com
www.PrescriptionsKeyWest.com
www.pharmacyworldwide.biz
www.imperialpills.com

www.antiaging-systems.com
www.israelonlinemeds.com

<http://sankuarydesign.com/justephe>

<http://stores.kimspharmacy.net>
www.littlebluepill.net
www.canadianpharmacy24-7.com
www.yourprescriptionforless.com
www.mainmedsonline.com
www.medhaven.net
www.wecaremedicalmall.com
www.medicaltouch.net
www.medprescribe.com
www.meds-discount.com
<http://www.medstore.biz>
www.medzonline.com
www.mexicorxstore.com

www.mexmeds4you.com/contactus

www.mkmedicalservices.com
www.mypharmastop.net
www.mydrugstoreplus.com
www.myfirstpharma.com
www.mypharmacentral.com
www.mypharmanow.com
www.mypharma1.net
www.myrxscripts.com
<http://mysavemeds.com>
www.neopills.com
www.netprescribe.net
www.noprescriptionpharma.com
www.offshorepharmacy.net
www.online-health-pharmacy.com

Online Ordering and Consulting for Prescription Drugs	www.aplusviagra.com
Order-Rx	www.order-rx.com
PharmSite	www.canadian-drugs-shop.com
PharmSite	www.allpills.net
PHD PharmacyRX	http://phdpharmacyrx.com
Phentermine	www.phentermine-discreet.com
pill quest	www.pillquest.com
PillDeals.com	www.pilldeals.com
Pillman.com	www.idealmeds.com
Pills for all	www.pillsforall.com/
Pills-For-Less.com	www.pills-for-less.com
Pillsourcemd.com	www.pillsourcemd.com
Planetdrugsdirect.com	www.planetdrugsdirect.com
PlanetSkunk	www.planetskunk.com
Pot Seed Bargains.com	www.potseedbargains.com
PremiumRx.com	www.premiumrx.com
PrescripNet.com	www.PrescripNet.com
PricePills.com	www.pricepills.com
PriorityDrugs.com	www.prioritydrugs.com
PriorityPills.com	www.prioritypills.com
PrivacyPharmacy.com	www.privacypharmacy.com
ProFarmacia	www.profarmacia.com
Propecia For Less	www.propeciaforless.com
PropeciaPharmacy	www.propeciapharmacy.com
ProzacPharmacy	www.prozacpharmacy.com
RapidMedsOnline.com	www.rapidmedsonline.com
Raremeds.com	www.raremeds.com
Real Medical	www.real-medical.com
Renee Boje Legal Defense Fund	www.reneeboje.com/donations.html
RFDrugstore.com	www.realfastdrugstore.com
RFDrugstore.com	www.rfdrugstore.com
RoyalCanadianMeds.com	www.royalcanadianmeds.com
Rx Go Express	http://rxgoexpress.es.tl
Rx2world.com	www.rx2world.com
Rx4Us	www.rx4us.com
Rxdirectdrugs.com	www.rxdirectpharmacy.com
RxMart.com	www.rxmart.com
RxMedsCanada	www.RxMedsCanada.com
Rx-now	www.rx-now.com
RxUSA.com	www.rxusa.com
Rx-Web	www.rx-web.com
Safe Pharmacy	www.safepharmacy.com
Safe Web Medical.com	www.safewebmedical.com
Salvia World	www.salviaworld.com
Senior Rx Care	www.canadianpharmacyservice.com
Senior Rx Care	www.seniorrxcare.com
Ship Rx Canada	www.shiprx.com
Shop Anabolic Online Steroids Store	www.shopanabolic.com
SILAGRA 100	www.silagra100.com
SimplePharmacy.com	www.simplepharmacy.com
Smart Choice Pharmacy	www.smartchoicepharmacy.com
Spanien Express	www.spanienexpress.org
Steroids Express	http://steroids-express.com
Summitmeds	www.summitmeds.com

supreme-pharmacy.com	www.supreme-pharmacy.com
SureDocLink.com	www.suredoclink.com
Sureway	www.sureway.com
The Canadian Drug Store	www.tcds.com
The Free Garage Sale	www.freegaragesale.net/medic.htm
ThriftyMedsNow.com	www.thriftymedsnow.com
Top-Pharmacies.com	www.rx-product.com
Top-Pharmacies.com	www.rx-list.com
Top-Pharmacies.com	www.prescription-drug.net
Total Meds	www.xanax4less.com
TriChrome World	www.trichomeworld.co.uk
Turbo Drugs	www.turbodrugs.com
Turbo Meds	www.turbopills.com
Turbo Meds	www.turbomeds.com
Turbo Pharmacy	www.turbopharmacy.com
UltimateRx.com	www.ultimaterx.com
United Pharmacies	www.menspharmacy.com
United Pharmacies	www.unitedpharmacies.com
United Pharmacies	www.hairpharmacy.com
United Pharmacies	www.slimmerspharmacy.com
United Pharmacies	www.womenspharmacy.com
United Pharmacies	www.lifepharmacy.com
United Pharmacy	www.united-pharmacy.com
Universal Drugstore	www.medisavecanada.com
UPS - United Prescription Service	http://unitedprescriptionservice.com
Urban Shaman Etheobotanicals	www.urbanshaman.net
US Can Pharmacy	www.uscanpharmacy.com
US Value Pharm	www.drug-store-outlets.com
US Value Pharm	www.us-value-pharm.com
USA Prescription	www.usaprescription.com
USADrugonline.com	www.usadrugonline.com
USARx.com	www.usarx.com
ValMeds	www.valmeds.com
Value Pharmaceuticals	www.valuepharmaceuticals.com
Viagra Online Pharmacy .com	www.viagraonlinepharmacy.com
Viagra.com.ua	www.viagra.com.ua
ViagraOnlinePharmacy.net	www.viagraonlinepharmacy.net
viagraonlinestore.com	www.viagraonlinestore.com
ViaMedic	www.viamedic.com
Viapro.com	www.via100.com
Viapro.com	www.viapro.com
Vidrin	www.vidrin.com
Vidrin	www.vidrin.biz
Watson's Pro	www.watsonspro.com
WorldCheapestGenerics.com	www.herbalviagraceuticals.com
Worldwide Value Meds	www.canadavaluemeds.com
XL Pharmacy	www.xlpharmacy.com
XL Pharmacy	www.supervalue-rx.com
Yartook.com	www.yartook.com
Yasmin	www.buyyasmin.com
YourSafeMed.com	www.yoursafemed.com
Zopiclone4sale	www.zopiclone4sale.com

Ohio Testimony - Addendum 2

OHIO REVISED CODE (Laws)

4729.551 Licensing of retail sellers.

Each person, whether located within or outside this state, who sells dangerous drugs at retail for delivery or distribution to persons residing in this state, shall be licensed as a terminal distributor of dangerous drugs pursuant to sections 4729.54 and 4729.55 of the Revised Code.

The board of pharmacy may enter into agreements with other states, federal agencies, and other entities to exchange information concerning the licensing and inspection of terminal distributors of dangerous drugs who are located within or outside this state and to investigate any alleged violations of the laws and rules governing the legal distribution of drugs by such persons.

Effective Date: 07-21-1994

OHIO ADMINISTRATIVE CODE (Administrative Rules)

Rule 4729-9-24 Retail And Wholesale Sales Of Dangerous Drugs On-Line (Ohio Pharmacy Board Rule)

(A) All persons selling or offering to sell dangerous drugs at retail or wholesale in Ohio must be licensed or registered with the Ohio state board of pharmacy as a dangerous drug distributor.

(B) All dangerous drug distributors registered or licensed with the Ohio state board of pharmacy and who sell or offer to sell dangerous drugs at retail or wholesale on the "Internet" to persons located in Ohio or any other state must make such sales only in compliance with all state and federal laws governing the legal distribution of dangerous drugs.

(C) "Internet" sites owned and/or maintained by Ohio registered or licensed dangerous drug distributors must provide the following information to the public on the "Internet" site and no drugs are to be shipped at wholesale or retail except in accordance with Ohio's drug laws:

- (1) Name dangerous drug distributor is licensed to do business as in Ohio.
- (2) Full address of licensed or registered site.
- (3) Name of responsible person as it appears on the dangerous drug distributor license.
- (4) Telephone number where responsible person may be contacted.
- (5) A list of the states in which the dangerous drug distributor may legally sell prescription drugs at wholesale or retail.
- (6) The name, address, and how the drug law enforcement agency may be contacted in each state in which the person is authorized to do business. This may include a link to the drug law enforcement agency's "Internet" site and/or their e-mail address.

(D) Any Ohio licensed or registered dangerous drug distributor requesting personal information from the public by way of the "Internet" site (questionnaire forms or e-mail) must provide for security and confidentiality of the information. This portion of the "Internet" site must also provide information regarding how the personal information will be used, pursuant to all federal and state laws, rules, and regulations, and ensure that such information is not used for purposes not disclosed without the written informed consent of the patient or person submitting personal information.

HISTORY: Eff 3-1-99; 1-1-04

4731-11-09 Prescribing to persons not seen by the physician. (Ohio Medical Board Rule)

(A) Except in institutional settings, on call situations, cross coverage situations, situations involving new patients, protocol situations, situations involving nurses practicing in accordance with standard care arrangements, and hospice settings, as described in paragraphs (D) and (E) of this rule, a physician shall not prescribe, dispense, or otherwise provide, or cause to be provided, any controlled substance to a person who the physician has never personally physically examined and diagnosed.

(B) Except in institutional settings, on call situations, cross coverage situations, situations involving new patients, protocol situations, situations involving nurses practicing in accordance with standard care arrangements, and hospice settings, as described in paragraphs (D) and (E) of this rule, a physician shall not prescribe, dispense, or otherwise provide, or cause to be provided, any dangerous drug which is not a controlled substance to a person who the physician has never personally physically examined and diagnosed, except in accordance with the following requirements:

(1) The physician is providing care in consultation with another physician who has an ongoing professional relationship with the patient, and who has agreed to supervise the patient's use of the drug or drugs to be provided; and

(2) The physician's care of the patient meets all applicable standards of care and all applicable statutory and regulatory requirements.

(C) A physician shall not advertise or offer, or permit the physician's name or certificate to be used in an advertisement or offer, to provide any dangerous drug in a manner that would violate paragraph (A) or paragraph (B) of this rule.

(D) Paragraphs (A) and (B) of this rule do not apply to or prohibit the provision of drugs to a person who is admitted as an inpatient to or is a resident of an institutional facility. For purposes of this rule, "institutional facility" has the same meaning as in rule 4729-17-01 of the Administrative Code. This paragraph does not authorize or legitimize practices that would violate other applicable standards or legal requirements.

(E) Paragraphs (A) and (B) of this rule do not apply to or prohibit:

(1) The provision of controlled substances or dangerous drugs by a physician to a person who is a patient of a colleague of the physician, if the drugs are provided pursuant to an on call or cross coverage arrangement between the physicians;

(2) The provision of controlled substances or dangerous drugs by a physician to a person who the physician has accepted as a patient, if the physician has scheduled or is in the process of scheduling an appointment to examine the patient and the drugs are intended to be used pending that appointment;

(3) The provision of controlled substances or dangerous drugs by emergency medical squad personnel, nurses, or other appropriately trained and licensed individuals, in accordance with protocols approved by the state board of pharmacy pursuant to rule 4729-5-01 of the Administrative Code; or

(4) The provision of controlled substances or dangerous drugs by a nurse practicing in accordance with a standard care arrangement that meets the requirements of Chapter 4723. of the Revised Code and rules promulgated by the board of nursing pursuant thereto.

(5) The provision of controlled substances or dangerous drugs by a physician who is a medical director or hospice physician of a hospice program licensed pursuant to Chapter 3712. of the Revised Code, to a patient who is enrolled in that hospice program. This paragraph does not

authorize or legitimize practices that would violate other applicable standards or legal requirements.

(F) For purposes of this rule, "controlled substance" has the same meaning as in section [3719.01](#) of the Revised Code.

(G) For purposes of this rule, "dangerous drug" has the same meaning as in section [4729.01](#) of the Revised Code.

(H) A violation of any provision of this rule, as determined by the board, shall constitute "failure to maintain minimal standards applicable to the selection or administration of drugs," as that clause is used in division (B)(2) of section [4731.22](#) of the Revised Code; "selling, prescribing, giving away, or administering drugs for other than legal and legitimate therapeutic purposes," as that clause is used in division (B)(3) of section [4731.22](#) of the Revised Code; and "a departure from, or the failure to conform to, minimal standards of care of similar practitioners under the same or similar circumstances, whether or not actual injury to a patient is established," as that clause is used in division (B)(6) of section [4731.22](#) of the Revised Code.

Effective: 08/31/2006

R.C. 119.032 review dates: 05/18/2006 and 08/31/2011

Promulgated Under: 119.03

Statutory Authority: 4731.05

Rule Amplifies: 4731.22

Prior Effective Dates: 10/1/99