

Yahoo! Internet Pharmacy Advertisements

A closer look at rogue Internet pharmacies sponsored by
Yahoo!'s online advertising program

a joint report by **legitscript** and **knujon**

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Analysis of Yahoo! Internet Pharmacy Online Advertisements

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H I G H L I G H T S

This report reviews Yahoo!'s Internet pharmacy advertisements and overall approach to Internet pharmacy verification. Our analysis indicates that Yahoo!'s online advertising program is being compromised by "rogue" Internet pharmacies that violate US federal and state laws as well as Yahoo!'s stated policies. A majority of prescription drug advertisements (82%) sponsored by Yahoo! on **Yahoo.com** that we reviewed were found to be operating outside the bounds of US law. These include some websites that do not require a valid (or any) prescription for the sale of prescription drugs.

Among the highlights of this report:

- Of the prescription drug and online pharmacy advertisements sponsored by Yahoo! that we reviewed, **82% led to Internet pharmacies** that do not require a prescription for prescription drugs or that violate other US drug safety and pharmacy laws.
- **Many advertisements we reviewed did not require a prescription for the sale of prescription drugs.** We attempted to purchase drugs without a prescription from two websites; in both cases, we received the drugs, one of which is habit-forming, without a valid prescription.
- In reviewing Yahoo!'s Internet pharmacy verification program, PharmacyChecker.com, **we were also able to purchase prescription drugs without a prescription from an Internet pharmacy listed on, and approved by, PharmacyChecker.com.** The drugs arrived from India without any prescription being required.
- Yahoo!'s policy requires Internet pharmacy advertisers to be based in the US or Canada. However, of the three Internet pharmacies we reviewed that had a Canadian pharmacy license, **none were actually shipping the drugs from Canada, but rather told us that the drugs would come from or through India, Turkey, Singapore and/or Barbados.**

About the Authors:

LegitScript is the only Internet pharmacy verification organization identified by the National Association of Boards of Pharmacy (NABP) as adhering to its standards for the review and verification of websites that sell prescription drugs. LegitScript operates the largest Internet pharmacy verification program in the United States, has approved over 200 legitimate Internet pharmacies, and designated over 40,000 Internet pharmacies as "rogue Internet pharmacies." LegitScript's staff includes licensed health care providers and former law enforcement officials.

KnjOn is the premier Internet compliance company. Through spam reduction, illicit site termination, Registrar contract monitoring, ICANN consultations and law enforcement training KnjOn has made the Internet policy structure more accountable and the end-user experience safer. KnjOn has exposed complex networks used to promote and distribute narcotics, pirated media, and knockoff merchandise as well as domain fraud perpetrated by industry insiders.

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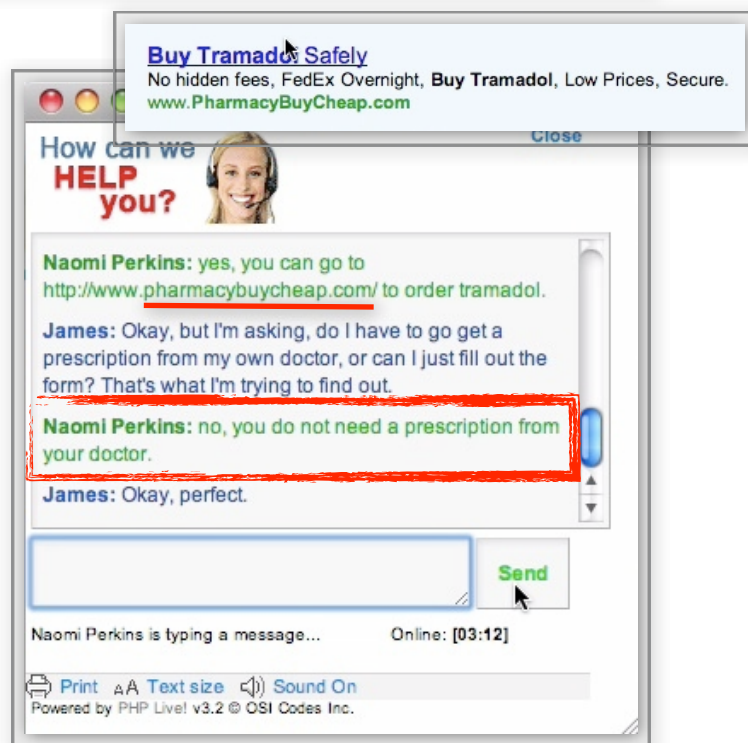
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Introduction

This report is the second in a series of in-depth analyses of the facilitation of “rogue” Internet pharmacies by US corporations. In our [first report](#), co-authors [LegitScript](#) and [KnujOn](#) focused on Microsoft and its search engine, bing.com. The report showed that most Internet pharmacy advertisements that we reviewed were unlawful in some way, including selling counterfeit drugs or selling prescription drugs without requiring a valid prescription.

Our second report is somewhat more comprehensive in nature, looking at Yahoo! Internet pharmacy advertisements as well as Yahoo!’s Internet pharmacy verification system. We confirmed that several Yahoo! advertisers do not require a prescription for the sale of prescription drugs, and that most Internet pharmacy ads are operating in violation of the law in some regard. We actually placed orders from two Yahoo! Internet pharmacy advertisers, and received prescription drugs -- in one case, a habit-forming drug -- from both. In contrast to our Microsoft purchases, we did not have an opportunity to submit either sample for testing, but the drug manufacturer we contacted confirmed that the drugs, based on their appearance, were “unauthorized knock-offs” of the legitimate version.

Yahoo! requires Internet pharmacies to be approved as legitimate by a company called PharmacyChecker before they are allowed to advertise as Yahoo!-sponsored search results. For some Yahoo!-sponsored Internet pharmacy advertisements, it is not clear whether the Internet pharmacy is using a “PharmacyChecker ID” to advertise, or has found some way around that requirement. We therefore attempted to purchase prescription drugs from two websites listed at PharmacyChecker.com without a prescription. We were successful in getting prescription drugs without a prescription from one website listed at PharmacyChecker.com, and the drugs were mailed to us from India. The other website, although operating contrary to US law in other ways, denied our request.



PharmacyBuyCheap.com, a Yahoo! Internet pharmacy ad, that told us we didn’t need a prescription from our doctor to get a habit-forming prescription drug -- just to fill out an online form.

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As in our Microsoft report, this Yahoo! report focuses exclusively on online advertisements (not organic

search results), and mainly

on Internet pharmacies that

sell prescription drugs

without requiring a

prescription. However, we

expanded our review to

look at another aspect of

Internet pharmacy

legitimacy: the source of the

drugs. To briefly explain

this, it is unlawful to import

prescription drugs directly

to the patient from outside

of the United States, even

from Canada. This is not

because authentic Canadian

brick-and-mortar

pharmacies are not generally

as safe as their US

counterparts. Rather, online

pharmacies claiming to be Canadian are not subject to US drug safety regulations, and, as we

found, a prescription from the US can simply be diverted to India or Turkey -- and the drugs

never go through Canada at all. The risk that these drugs are counterfeit or adulterated goes up

dramatically when ordered outside the US, as we illustrated in our Microsoft report by

purchasing drugs from India that turned out to be counterfeit. In this review, we found that

licensed Canadian Internet pharmacy advertisers were diverting written prescriptions to India,

Singapore, Barbados or Turkey, and sending the drugs from those locations, not from their

licensed Canadian pharmacy. This is, of course, illegal, misleading and unsafe.

Why This Issue is Important

The proliferation of rogue Internet pharmacies helps to fuel two dangerous trends: prescription

drug abuse and the counterfeit drug trade. Prescription drug abuse now accounts for the second

largest drug abuse category in the US, with more abusers than cocaine, heroin and

methamphetamine combined. The illicit sale of prescription drugs over the Internet helps drive

this trend. Similarly, many Internet users who have purchased drugs online subsequently report

receiving counterfeit drugs, as LegitScript and KnujOn did in our first report on Microsoft

advertisements. The consequences of ingesting counterfeit, or adulterated, drugs can be dire --

even fatal.

Generic Cialis 20mg
10-Tablets \$59.99
Free Shipping. Licensed Canadian Pharmacy. Low Prices Guaranteed.
www.OnlineCanadaRx.com

have both brand and generic
you: okay. I'm sorry for all the g
generic tablets for Viagra, which
where do they come from, and are they also 3-4 weeks?
Natasha: They are also from india and 3 to 4 weeks
Natasha: brand is from turkey
you: Okay. If they are mailed from India, what are the
chances they will get held up at customs...I am in US.
Does that happen often? last question, i promise
Natasha: lol usually we dont have any problems. 99.9%
are delivered with no problems
you: Okay great. Thanks a lot.
Natasha: no prob
Natasha: anything else I can help with?

HELLO
How May I Help You?

Live chat by
LIVEperson
Send

OnlineCanadaRx.com, a licensed Canadian pharmacy, told us that the drugs would not be shipped from its Canadian pharmacy, but rather that we would get Turkish drugs from India.

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Search engines like Yahoo! can help put a halt to these negative trends by addressing the legitimacy of their online advertisers. Without the ability to advertise online, rogue Internet pharmacies would not be able to reach nearly as many potential customers. These rogue operators rely on being able to reach customers via the prime Internet “real estate” they purchase on Yahoo!’s advertising space. Eliminating their ability to advertise would deal a crippling blow to their business strategy and would be an important step toward protecting public health and safety.

Moreover, it is in Yahoo!’s interest to provide trustworthy and reliable links in their advertising space -- both to build consumer trust and to avoid liability. Internet users, understandably, may assume that clicking on an ads displayed by Yahoo! will lead to a trustworthy and legal website. If that assumption proves false, and a consumer orders from an Internet pharmacy that is not operating legally, it poses valid consumer protection and public health concerns.

Finally, it is well accepted that reputable corporations should not draw profits from illegal activity. Yahoo! (as well as Google and Microsoft) paid millions in fines in 2007 for displaying advertisements for, and consequently profiting from, illegal online gambling. The same principle applies to ads for rogue Internet pharmacies selling real or fake drugs without a prescription, some of which may finance other illegal activity.¹

Internet Pharmacies: What’s Legal, What’s Not

For the most part, the laws that apply to Internet pharmacies in the United States are fairly clear, and are governed primarily by state laws and regulations, with some federal oversight. Pharmacies are regulated by state boards of pharmacy, which in turn, are collectively represented by the National Association of Boards of Pharmacy (NABP). The NABP has issued [clear industry standards](#) for Internet pharmacies that reflect the laws, regulations and safety standards related to pharmacy practice generally, and on the Internet specifically.

In this report, the authors focus on three types of violations of federal and state laws (as well as of NABP standards) that are particularly relevant, and are among the requirements most frequently violated by rogue Internet pharmacies. The three requirements are listed below:

1. An Internet pharmacy must supply drugs from a pharmacy that has a valid license in any state where the pharmacy dispenses or sends prescription drugs.²
2. An Internet pharmacy must not knowingly fill prescriptions for a patient who has never seen the prescribing doctor in person, but has instead only filled out an online form.

¹ Our Microsoft report contained an extensive discussion of the link between the illicit sale of pharmaceuticals on the Internet and organized crime as well as, in some cases, terrorism. Please refer to our Microsoft report for that discussion.

² Of the 51 jurisdictions in the United States, all but three require an in-state license by out-of-state pharmacy. The three jurisdictions that recognize an out-of-state US pharmacy license are Massachusetts, Pennsylvania and Georgia.

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3. An Internet pharmacy must only sell drugs that are “FDA-approved,” which means — among other things — that the prescription drugs must come directly from a licensed pharmacy in the United States, not one that is located outside of the United States, even if it has a foreign pharmacy license.

While the first point above is probably self-explanatory, the second and third points require brief explanation. Prescription drugs are designated as such because, unlike over-the-counter drugs, they require some degree of medical supervision. The requisite degree of medical supervision cannot exist without a *bona fide* doctor-patient relationship. With very rare exceptions, simply filling out a form online, without ever having seen the doctor or otherwise licensed provider (including a covering physician) in person, is not sufficient to form this relationship.

The third point — the requirement that prescription drugs be “FDA-approved” and not imported directly into the US from outside of the country — is based on the closed system of prescription drug distribution mandated by the Food and Drug Administration (FDA) and by federal law.³ With rare exceptions, prescription drugs may not be lawfully imported directly from outside of the United States to the patient. This has been the subject of a great deal of misrepresentation, particularly by Internet pharmacies that claim it is lawful to import a “personal use quantity” (up to 90 days) of prescription drugs. There has never been any such exception.⁴ In some cases, prescription drugs imported from outside of the U.S. may end up being safe; but in some cases, they have been counterfeit or adulterated. Ordering drugs directly from an Internet pharmacy outside of the U.S. is not legal, and is reasonably understood as a gamble.

In short, Internet pharmacies must be licensed in one or more US states; must be physically domiciled and source FDA-approved drugs from within in the United States; and must require patients to have been examined by a physician, not merely fill out an online form, prior to receiving prescription drugs. Internet pharmacies that fail to meet these criteria are acting unlawfully and are reasonably classified as “rogue” Internet pharmacies.

Methodology and Results

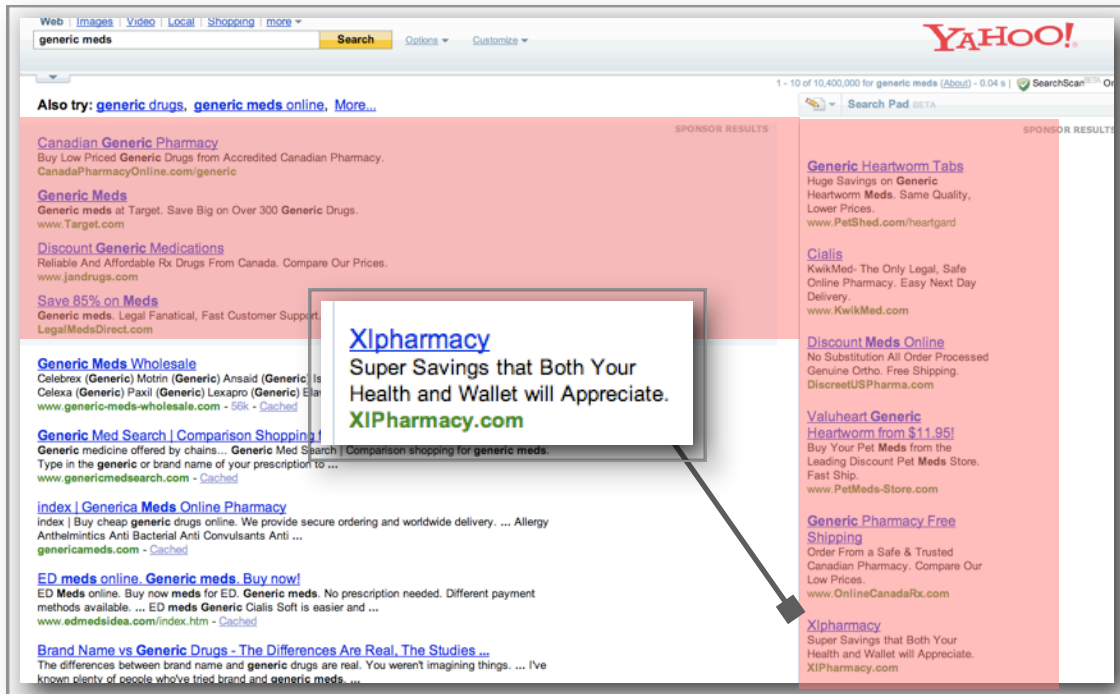
As with our report on Microsoft, the authors only evaluated online advertisements, or “sponsored search results,” for Internet pharmacies on yahoo.com. We did not review organic search results, which are unpaid and do not result in direct revenue for the search engines.

³ For the FDA’s position on this issue, refer to “Policy Implications of Importing Drugs into the United States,” Statement of Randall Lutter, Ph.D., Acting Deputy Commissioner for Policy, Food and Drug Administration, March 7, 2007, accessible at <http://www.fda.gov/NewsEvents/Testimony/ucm154233.htm>.

⁴ The US Food and Drug Administration has, as a matter of policy (not law or regulation), given its agents enforcement discretion in a very limited set of cases. However, the criteria require specific elements, such as the unavailability of the drug in the United States. A fuller discussion of the grant of enforcement discretion is at <http://www.fda.gov/ForIndustry/ImportProgram/ImportPolicyandInformationbyProduct/default.htm>. The claim that it is legal to import prescription drugs for personal use into the country from a foreign Internet pharmacy is false.

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The authors do not suggest that we evaluated every Internet pharmacy advertisement on Yahoo!, nor even that the sample we chose was statistically representative of all Internet pharmacy ads.



Sponsored search results (in red) are paid advertisements and appear at the top and right-hand side of the screen upon performing a search on yahoo.com. Organic search results (in white) are unpaid results to a user's search and appear in the middle of the page. This report only analyzes paid Yahoo! Sponsor Sites.

(We do not have the full list of Yahoo!'s approved Internet pharmacy advertisers, so developing a statistically representative sample would be challenging.) Rather, we used a fairly random, but popular, selection of prescription drug search terms, most of which were similar to those we used in conducting our Microsoft (bing.com) searches.

Co-Authors' Note

Before getting into the analytical portion of our report, the authors want to address one issue head-on: the fact that both PharmacyChecker and LegitScript perform Internet pharmacy verification services. Some may infer that the issuance of these reports stems from LegitScript's competitive or commercial⁵ interest. That inference misses important facts -- and the larger point. The authors believe this issue needs to be brought to light as a matter of public health and safety, regardless of who verifies Internet pharmacy advertisers for the search engines.

These are not ads for televisions or bicycles. These are ads for pharmaceuticals, which have the capacity to heal or to hurt. A serious discussion of the problem cannot occur without mentioning the company currently responsible for verifying Internet pharmacy advertisers for the search

⁵ LegitScript does not charge Internet pharmacies for verification or approval, but rather offers it as a free public service.

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engines. In this regard, the authors believe that PharmacyChecker has a valuable and constructive role to play in this discussion. In some cases discussed herein, it is not clear whether the rogue Internet pharmacy was using a PharmacyChecker ID or not to participate in Yahoo!'s advertising program. The authors encourage PharmacyChecker to publicly disclose the full list of websites -- Internet pharmacies or affiliates -- to which it has ever granted a "PharmacyChecker ID" allowing websites to participate in the search engines' advertising programs. The list is not currently public, but there is no reason to keep it a secret: after all, pharmacy licenses are a matter of public record. PharmacyChecker stated that it had approved 264 websites in May of 2008,⁶ but only 35 or so are publicly listed on its website. The authors encourage PharmacyChecker to disclose a full list as a first step in understanding how and why rogue online pharmacies are gaining access to Yahoo!'s ad program.

Moreover, the primary issue here is not which organization performs verification services. Rather, the issue is what standards Internet pharmacies are held to. The authors strongly believe that the search engines should require Internet pharmacies to adhere to standards developed or approved by the [National Association of Boards of Pharmacy \(NABP\)](#)⁷. First among the various options should be the NABP's own [Verified Internet Pharmacy Practices Sites \(VIPPS\)](#) program, the gold standard for Internet pharmacy verification. Indeed, the authors' recommendation is that search engines should first consider using the NABP's VIPPS program to verify Internet pharmacies before considering any other program, including LegitScript's.⁸ The authors would support any organization, including PharmacyChecker, that holds Internet pharmacies to standards developed or recognized by the NABP.

Why are standards developed or approved by the National Association of Boards of Pharmacy centrally relevant to Internet pharmacy legitimacy? The reason is simple: all pharmacies are regulated by state pharmacy boards, which are collectively represented by the NABP. When it comes to defining what is and what isn't a legitimate pharmacy, private organizations -- whether LegitScript, PharmacyChecker or somebody else -- can't just make up their own rules. That would be like a private company setting lower continuing medical education or ethics standards for surgeons than the American Medical Association requires. When it comes to Internet pharmacy standards, the NABP's voice is, by definition, the most important voice in the room. Moreover, those standards are fundamentally the same as those that govern brick-and-mortar pharmacies used throughout the US everyday. Shouldn't American consumers be assured the same safeguards online? Indeed, the consequences of what happens when search engines set the bar lower is contained in this report, and in our report about Microsoft: counterfeit or knock-off drugs, and prescription drugs sold without the requirement of a valid prescription.

⁶ See https://www.pharmacychecker.com/news/news_052908.asp.

⁷ Neither LegitScript nor KnuiOn have, or have ever had, a financial relationship with the NABP, including the sale or purchase of any products or services.

⁸ In prior discussions with Yahoo!, LegitScript has offered to make its program available to help identify illegal online pharmacy advertisers. However, LegitScript consistently recommends VIPPS as a more rigorous program than LegitScript's own program, including in LegitScript's [FAQs](#).

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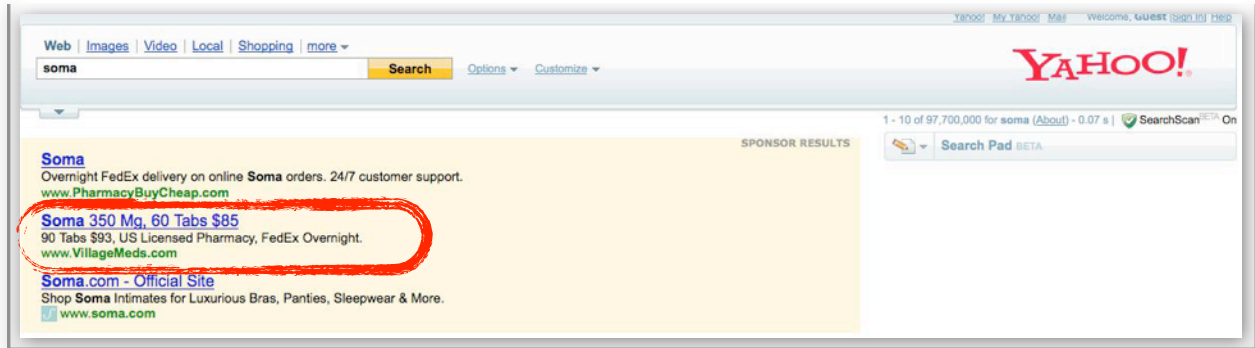
VI. Rogue Internet Pharmacies Sponsored by Yahoo!: Ten Examples

LegitScript and KnujOn reviewed ten sample Yahoo! advertisements for Internet pharmacies that violate US law and pharmacy practice standards. Here is a summary of those ten sponsored search results, and how they violate US federal or state laws as well as Yahoo!'s stated Internet pharmacy advertising policies.

1. **VillageMeds.com (MedsRx1.com)**. The authors were able to purchase addictive prescription drugs without a prior prescription from these identical websites, one in late 2008 and the other in mid-2009.
 - 1a. **ShopEastWest.com** (via *pharmacychecker.com*, also advertises on Yahoo! via [pricegrabber.com](#)). We purchased Nexium, a prescription-only drug, without a prescription from this Internet pharmacy, which we accessed via its listing on PharmacyChecker.com, Yahoo's Internet pharmacy verification service. The drugs arrived from India.
2. **RoyalDrugstore.com**. We purchased Carbatrol, a prescription-only medication, without a prescription from this Yahoo! Internet pharmacy advertiser. The drugs arrived from India.
3. **CheapoDrugs.com**. This Internet pharmacy claims a Canadian pharmacy license, but the only country it refuses to do business in is Canada. It told us the drugs we would order were from India via Barbados, not Canada, and it cannot legally do business in Canada because prescription drug importation into Canada would be illegal.
4. **JanDrugs.com**. Likewise, this Internet pharmacy has a Canadian license, but some orders to the US aren't sent from its Canadian pharmacy, but rather from India via Singapore.
5. **OnlineCanadaRx.com**. This Internet pharmacy cites a Canadian pharmacy license, but says the drugs would be packaged in Turkey and sent from India.
6. **Drug-comparison.com**. Sometimes, this website directs users to a licensed pharmacy in the US, but at other times, redirects users to a no-prescription-required website affiliated with spammers.
7. **PharmacyBuyCheap.com**. This website told us that we would not need a prescription from our doctor to purchase a habit-forming prescription medication.
8. **Med-search.org**. This advertiser is a "prescription drug search engine" that acts as a front for Internet pharmacies that sell controlled substances without requiring a prescription.
9. **Cialis-club.net**. From its homepage, the website seems to be merely informational, but its ads lead first to the website, then redirect users to a no-prescription-required website overseas.
10. **Generic-pharmacy.net**. This advertiser also told us that we would not need a prescription in order to purchase prescription drugs.

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I. Yahoo rogue advertiser #1: VillageMeds.com (related to MedsRx1.com, other ads)



A Yahoo! advertisement for VillageMeds.com, an approved Yahoo! advertiser that does not require a prescription in order to submit an order for potentially addictive drugs like Soma.

We begin our analysis of Yahoo!-sponsored rogue Internet pharmacy ads with an example that demonstrates a common pattern among these advertisers. Rogue Internet pharmacies usually do not operate independently. Rather, they operate in groups, or networks, of affiliated websites. This means that multiple pharmacy websites might link back through the same payment processing service, use the same supplier, and/or share website design and contact information. The only thing truly different among them is their domain names. It's a convoluted business model, but one that also helps elude authorities. There are ways, however, to spot the pattern and uncover common links among rogue Internet pharmacies in order to keep them from advertising. Our first example illustrates how this can be done.

In late 2008, LegitScript was able to obtain addictive prescription drugs without a prior prescription from Yahoo! advertiser **MedsRx1.com**. LegitScript notified Yahoo!, and that ad was removed. However, it was quickly replaced with an ad for a virtually identical website, **DoRiteRx.com**. This site also appeared to offer prescription drugs without requiring a prescription and seemed different in name only from **MedsRx1.com**. Several weeks after that, **DoRiteRx.com** was replaced by **VillageMeds.com**, another site that seemed related to

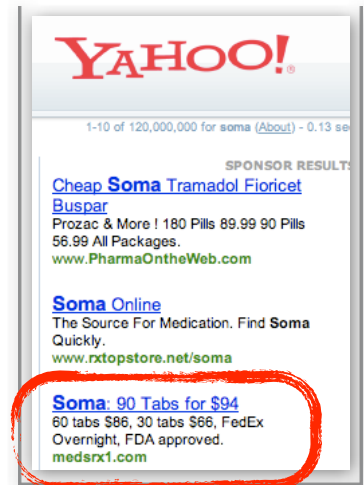


LegitScript notified Yahoo! about MedsRx1.com after we were able to buy prescription drugs without a prior prescription. That advertisement was taken down, but quickly replaced with a series of websites with virtually identical content, like VillageMeds.com, from which we also purchased prescription drugs without a prior prescription.

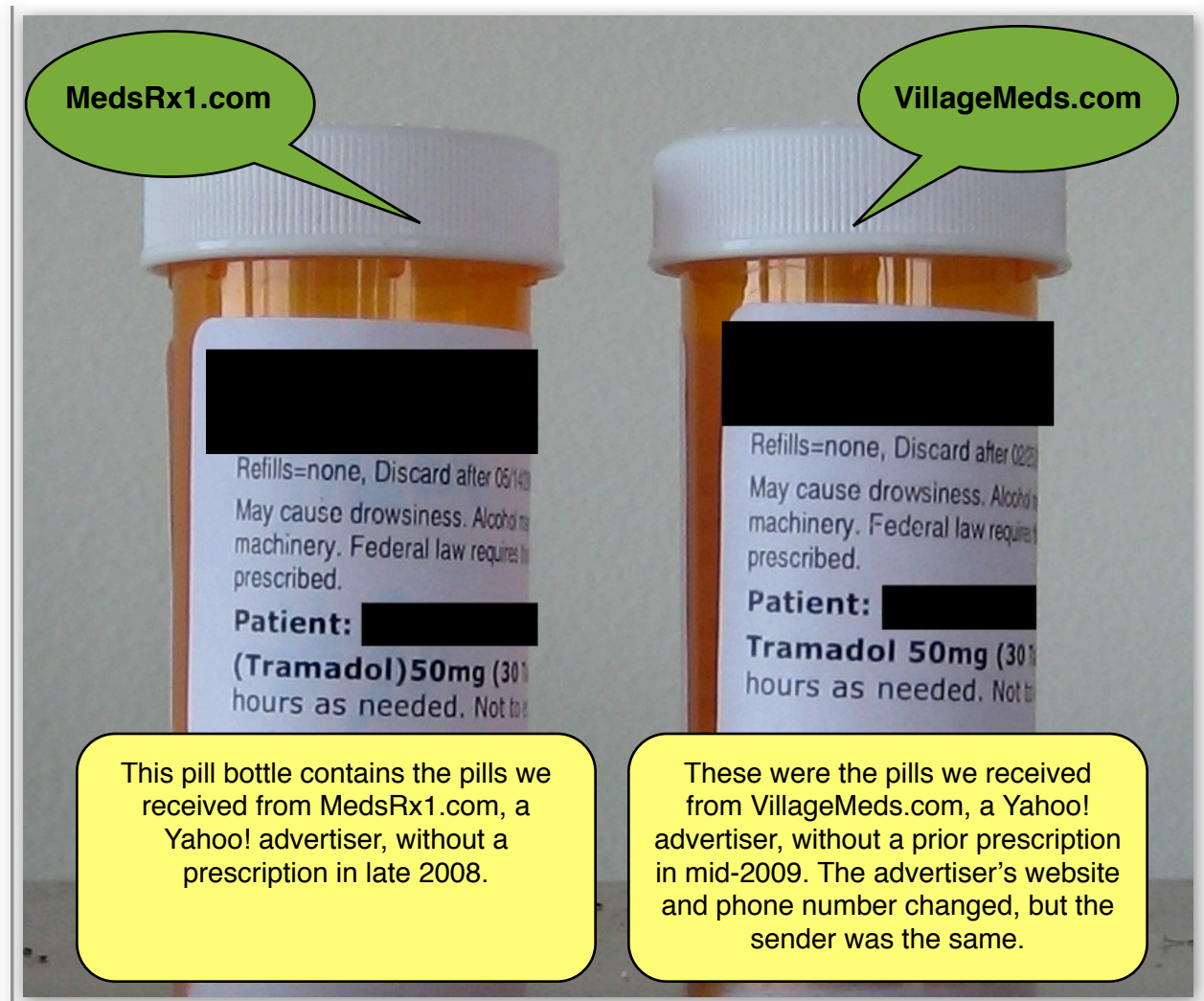
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MedsRx1.com and appeared to sell prescription medications without requiring a doctor's visit. At that point, in July 2009, LegitScript conducted a second test buy to confirm that these advertisers were merely changing domain names and a valid prescription would not be required. The drugs received from **VillageMeds.com** were identical in every way, from the dispensing pharmacy to the type of bottle used, method of delivery, credit card charge, and pills, to the drugs we received from **MedsRx1.com** without a prescription some months earlier.

MedsRx1.com and **VillageMeds.com** are, for all practical purposes, the same Internet pharmacy: they have different domain names, but the site design is largely the same, the payment system is identical, they advertise for and carry the same drugs, and most importantly, for both orders, the drugs that we received without a prescription came from the same address. (The Pharmacy is not licensed in the state where we received the drugs -- yet another violation of the law.)

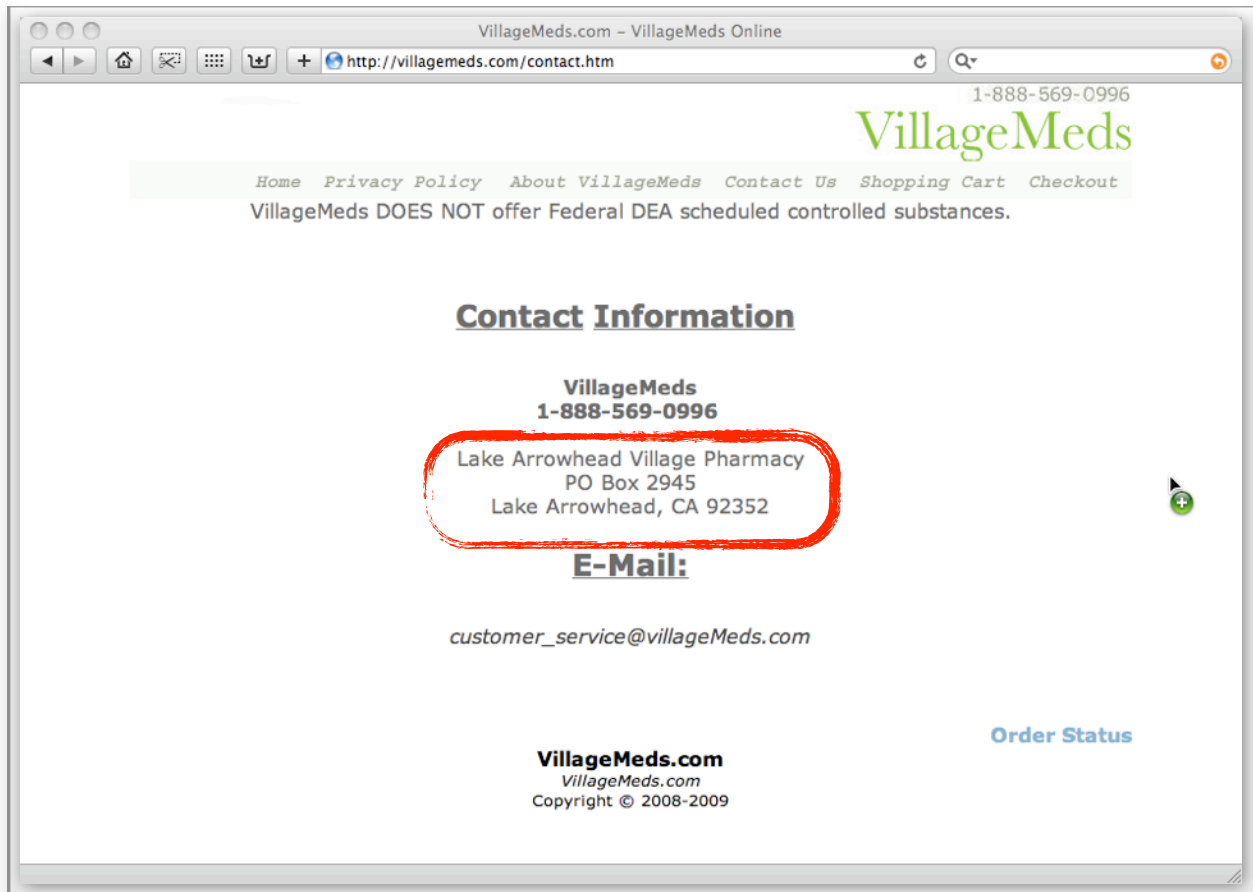


A Yahoo! ad from 2008, when we first bought from **MedsRx1.com** without seeing a doctor.



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To add to the deceptive and fraudulent nature of this website, **VillageMeds.com** displays on its website the contact information for a pharmacy in California: Lake Arrowhead Village Pharmacy. (The pharmacy actually exists.) Any reasonable Internet user would conclude that Lake Arrowhead Village Pharmacy fills the prescriptions for **VillageMeds.com**. However, as noted above, the drugs came from a completely different pharmacy in another state. And while it may seem encouraging that the pharmacies at least appear to be located within the US, consider this: if these pharmacies are willing fill prescription orders without requiring valid prescriptions, what other regulations are they willing to bend and/or break?



The contact page for VillageMeds.com, an approved Yahoo! advertiser that implies it fills prescriptions at this pharmacy in California. The prescriptions were filled, without requiring a doctor's visit, by the same pharmacy that we notified Yahoo was filing prescriptions without requiring a doctor's visit months before.

VillageMeds.com (and MedsRx1.com) are thus accurately described as rogue Internet pharmacies for several reasons. First, we received a potentially addictive drug without having a prior prescription or ever seeing a doctor. There was no verification of our identity or actual need for the medication. Second, the pharmacy identified on the website is not the dispensing pharmacy. Third, the dispensing pharmacy is not licensed in the state where we received the drug.

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VillageMeds.com is (and **MedsRx1.com**, was) a Yahoo! and Google advertiser, though these orders were both completed via Yahoo! Internet pharmacy advertisements. The orders were completed absent a visit with a physician, and without a valid prescription. Instead, all that was required was completion of an online form and payment with a credit card. Within days, the order arrived containing tramadol, a potentially addictive pain reliever.

How and why were **MedsRx1.com** and **VillageMeds.com** allowed to gain admittance to Yahoo!'s advertising program? As noted earlier, Yahoo! requires Internet pharmacies to be PharmacyChecker-approved. However, PharmacyChecker does not require approved websites to display a PharmacyChecker seal of approval, and has not released a full list of the websites it has approved, making it difficult to discern which pharmacy websites use a PharmacyChecker ID to participate in search engines' advertising programs. It is therefore unknown whether **VillageMeds.com** and **MedsRx1.com**, as well as related websites like **DoRiteRx.com** and **First-Dose.com**, were ever provided a PharmacyChecker ID or not.

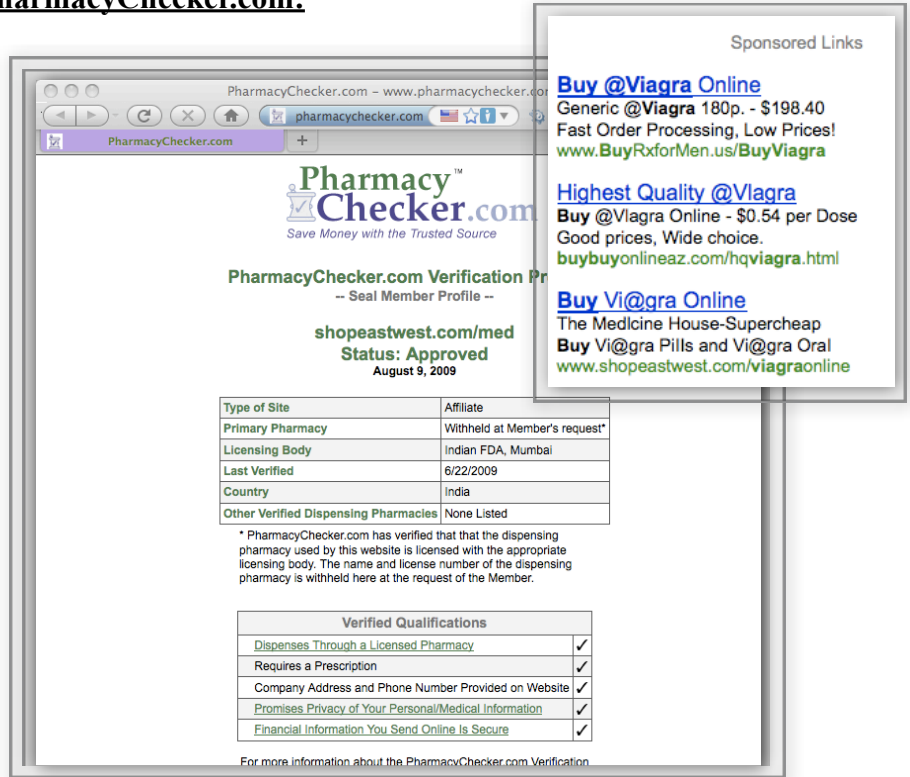
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IA. Rogue Internet pharmacy via PharmacyChecker.com: ShopEastWest.com

Because it is difficult to tell with any certainty whether many Yahoo! advertisers have been approved by PharmacyChecker, the authors took a brief detour to look at Yahoo!'s Internet pharmacy verification system.

In July 2009, the authors visited PharmacyChecker.com, as part of our comprehensive evaluation of Yahoo!'s Internet pharmacy ads as well as its Internet pharmacy verification program. We [clicked](#) on ShopEastWest.com, an Internet pharmacy listed on PharmacyChecker's website, and approved by PharmacyChecker. ShopEastWest.com/med/ displays the PharmacyChecker Seal of Approval, and some Yahoo! prescription drug price comparison advertisements direct to websites listing ShopEastWest.com.⁹ After arriving at ShopEastWest.com, we purchased generic Nexium, a prescription-only medication, without a prescription or ever having seen a doctor. It arrived from India, and we were never required to provide a prescription.

To walk through this process, we first visited PharmacyChecker.com. On its website, the Internet pharmacy verification company lists about 35 Internet pharmacies that it has approved.



The PharmacyChecker.com approval page and Google ad for ShopEastWest.com, an Internet pharmacy that the authors purchased a prescription-only drug without a prescription from, accessing the Internet pharmacy via PharmacyChecker.com.

The image shows a screenshot of the PharmacyChecker.com website's 'online pharmacy ratings and profiles' page. The browser address bar shows 'http://www.pharmacychecker.com/onlinepharmacyratings.asp'. The page displays a table of pharmacy profiles with columns for location, ratings, and other details.

Profile	UK, USA										
Profile	Canada, India	✓✓✓✓✓	✓	✓	✓	✓	✓	✓	See Comments	Worldwide	OTC, Pets
Profile	India	✓✓✓✓✓	✓	✓	✓	✓	✓	✓	See Comments	Worldwide excluding Africa	Pets, Herbal and Ayurvedic

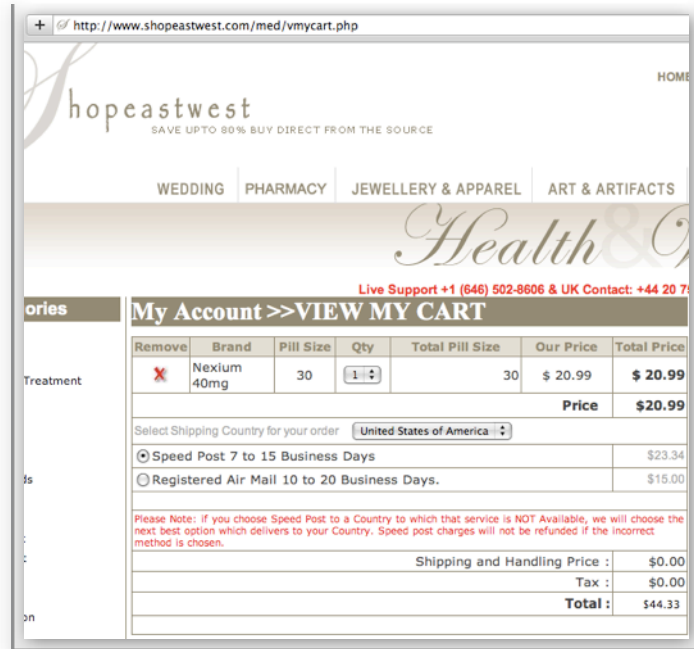
The PharmacyChecker.com listing for shopeastwest.com as of late July/early August, 2009.

⁹ Shopeastwest.com advertises prescription drugs for sale on Yahoo! via price comparison websites such as PriceGrabber.com and Calibex.com, and directly on Google (as shown above). Affiliates or price comparison websites are also required to adhere to Yahoo! policy on prescription drug advertising (PharmacyChecker verification) if results may include Internet pharmacies.

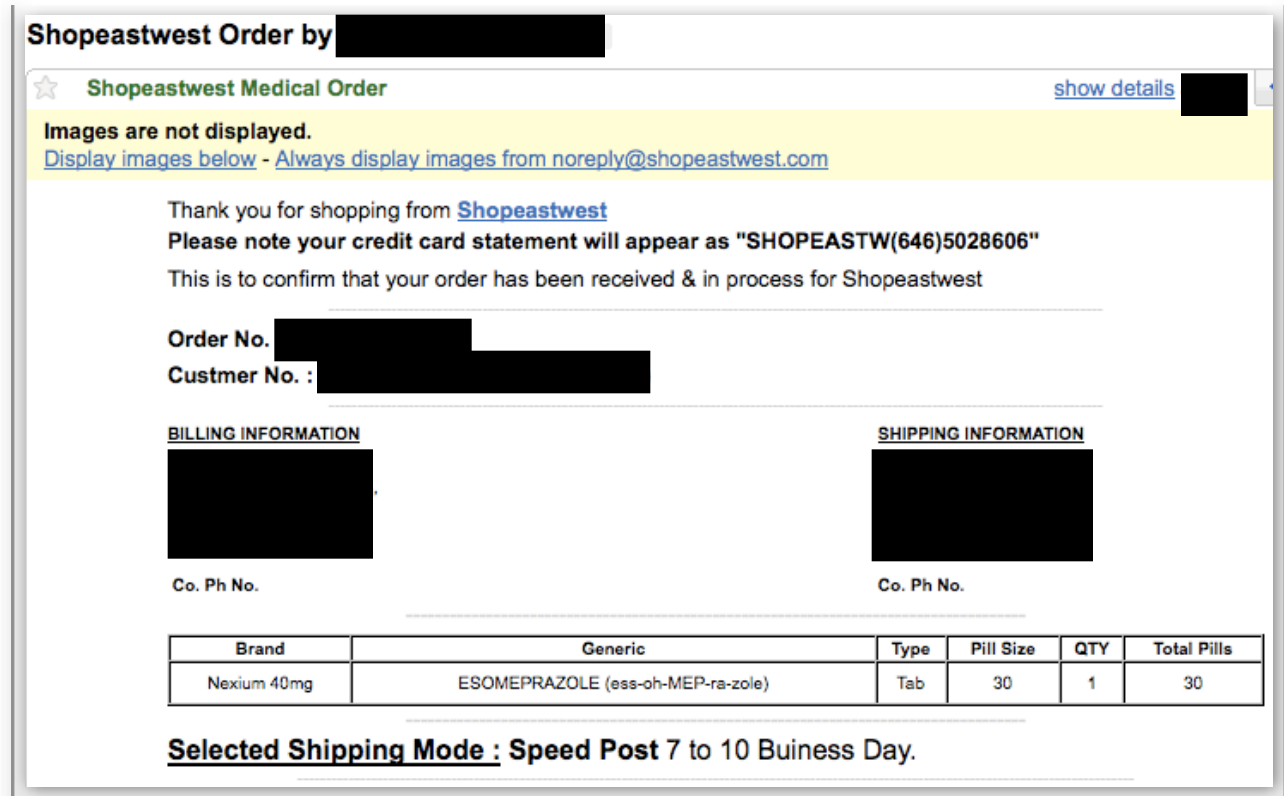
Analysis of Yahoo! Internet Pharmacy Online Advertisements

ShopEastWest.com is one of these Internet pharmacies. (ShopEastWest also sells non-drug items; the Internet pharmacy is located at shopeastwest.com/med/.) We clicked on the link and arrived at shopeastwest.com/med/. We confirmed that the website was PharmacyChecker-approved by clicking on the Seal of Approval, which redirected us to PharmacyChecker.com's website and a page telling us that shopeastwest.com meets PharmacyChecker's standards.

Once we arrived at shopeastwest.com/med/, we randomly chose Nexium, a prescription-only proton pump inhibitor prescribed for a number of conditions, most commonly Gastroesophageal reflux disease. While safe when used as prescribed, Nexium also has a number of potential side effects and potential interactions with



Our order for "generic Nexium" at ShopEastWest.com.



Our order confirmation for prescription drugs without a prescription from ShopEastWest.com.

Analysis of Yahoo! Internet Pharmacy Online Advertisements

other drugs that make it dangerous to take without medical supervision. By law, the drug requires a prescription. By law, the drug cannot be imported into the US from outside of the country.

We simply paid for the Nexium, and received an email confirmation soon thereafter. At no point did the website, or any representative from shopeastwest.com, contact us to request a prescription; indeed, we did not have one and never saw a doctor. Upon completing the payment information, we received an email confirmation that the order was being processed.

A few days later, the generic Nexium -- “Esomi 40”, not made by the approved manufacturer of Nexium, but rather by “Preet Remedies Pvt. Ltd., at 184 HPSIDC Industrial Area, Baddi-173205” -- arrived in the mail. (Incidentally, the generic version of this drug is not approved for use in the United States.) The exact drugs we received are shown below. The package did not contain any drug safety or use instructions.



The actual drugs we received, including packaging, from ShopEastWest.com, without a prescription, from India.

The authors note that shopeastwest.com has been listed for some time as a “not recommended” Internet pharmacy by the National Association of Boards of Pharmacy (NABP). LegitScript has similarly identified the website as a “rogue Internet pharmacy” -- indeed, ShopEastWest.com is the primary website within a small network of “affiliate” sites that similarly do not require a prescription for the sale of prescription drugs. While the website sent us drugs from India, the website itself is hosted in China (Hong Kong), has WhoIs proxy information in Malaysia, and it openly uses a payment processor, veripayment.com, that is primarily a boutique payment service provider for no-prescription-required Internet pharmacies, has strong connections to a number of other rogue pharmaceutical networks, and operates mainly from Panama. VeriPayment.com is also the primary payment service provider for at least one other rogue Internet pharmacy advertiser covered in this report, generic-pharmacy.net (our tenth example), and several other no-prescription-required websites and networks.

It is beyond dispute that shopeastwest.com is an illegal, rogue Internet pharmacy that does not require a prescription for the sale of prescription drugs. Nonetheless, the authors accessed this site via [PharmacyChecker](http://PharmacyChecker.com)'s list of approved Internet pharmacies.

Analysis of Yahoo! Internet Pharmacy Online Advertisements

II. Rogue Yahoo! Advertiser #2: RoyalDrugstore.com

Returning to our review of Yahoo! advertisers, the authors conducted a Yahoo! search for “generic drugs”. One of the Yahoo! sponsored search results, or advertisements, was for **royaldrugstore.com**. Clicking on this advertisement, LegitScript was able to purchase Carbatrol, a prescription-only seizure medication, without a prescription. The drugs arrived from India, which is illegal and raises the risk that the drugs are counterfeit.

As shown in the image below, we engaged RoyalDrugstore.com in an online chat. They confirmed that no prescription would be required -- despite the fact that Carbatrol side effects can be serious and have fatal consequences in certain populations. The drugs arrived, without any instructions, in a plain yellow envelope.

The authors did send the Carbatrol to Shire Pharmaceuticals, the manufacturer. Shire informed us that they do not have domestic facilities for conducting a test to determine if the drugs are counterfeit. However, Shire did inform us that the drugs are a “knock-off” of their product. In

YAHOO!

57,900,000 for generic drugs (About) - 0.20 s | SearchScanSM On

SPONSOR RESULTS

[Canadian Generic Drug](#)
We Beat All Competitors' Price.
Save up to 90%. Order Online Now.
www.CanadaDrugPharmacy.com

[Generic Drug Company](#)
Buy Rx Meds and Save. Canada's Premier Online Pharmacy.
www.CanadaDrugsOnline.com

[Generic Viagra 100mg](#)
Generic Viagra - Sildenafil
50/100mg.
www.royaldrugstore.com

A Yahoo ad for royaldrugstore.com, an Internet “pharmacy” sells prescription drugs without requiring a prescription, from India.

Royal Drugstore Carbatrol online - Carbamazepine 200mg

Customer Support Messenger

You are speaking with Customer Service operator

Live Support

Currently in room: Francis, Ann James

Francis: Hello, do I need a prescription for Carbatrol or can I simply order?

Welcome Francis! Your request has been directed to the Customer Service (English only) department. Please wait for our operator to answer your call.

Your call is accepted. If your question concerns your order with us, please specify the order number.

Ann James: You don't need it.

Francis: Thanks.

Send

Powered by ProvideSupport.com

US Toll Free: +1 800 532 4808
Regular US: +1 718 887 3424
UK Phone: +44 200 222 7084

20% save

Trial Packs

- >01 Viagra + Cialis
- >02 Viagra + Levitra
- >03 Viagra + Levitra + Cialis

Our Benefits

- Free shipping
- Free product packaging
- Free shipping
- Free product selection
- 24/7 customer support

Live Support

online

Your Shopping Cart

\$61.00 (1 Items) [Checkout](#)

Generic Medications Info | Medications by A/Z | Pharmaceutical News & Reviews

Home > Generic Carbatrol

Generic Carbatrol
Carbamazepine 200mg

Package	Price	Per Pill	Order
200mg x 30 pills	51.00	US \$ 1.70	Add to cart
200mg x 60 pills	60.00	US \$ 1.00	Add to cart

In this online chat, royaldrugstore.com told us that we don't need a prescription to order Carbatrol, a prescription-only anti-seizure medication.

Analysis of Yahoo! Internet Pharmacy Online Advertisements

contrast to the photo image of what we ordered, which displayed genuine Shire Carbatrol, we received a version that the company confirmed it did not make, raising the risk that the drugs were counterfeit.



The knock-off Carbatrol that we received from RoyalDrugstore.com, without a prescription. The drugs came from India, and contained no instructions for use -- just pills. The address is the same as internationaldrugmart.com, with an India address.

Analysis of Yahoo! Internet Pharmacy Online Advertisements

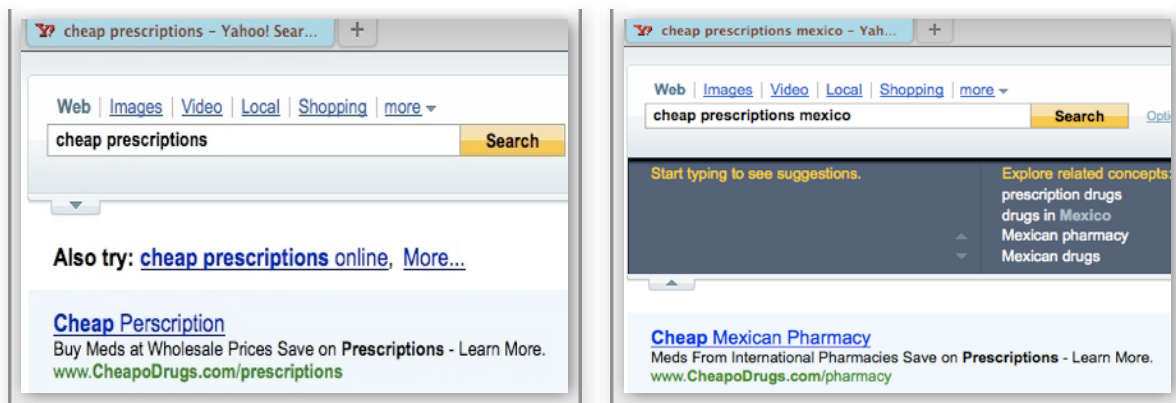
III. Rogue Internet Pharmacy Ad #3: CheapoDrugs.com (= CanadaDrugs.com)

Our third example tackles the issue of “licensed Canadian Internet pharmacies” allowed to advertise on Yahoo!. Yahoo!’s stated policy (below, on PharmacyChecker.com) requires its Internet pharmacy advertisers to be based in the US or Canada. We take this to mean that the pharmacy must be located within, and its drugs must come from, the US or Canada and follow the laws of those countries.



Yahoo!’s policy, via PharmacyChecker, requires that the pharmacy “be based in the U.S. or Canada” in order to participate in the search engine’s advertising program. However, CheapoDrugs.com, a PharmacyChecker-approved Yahoo! advertiser, told us that they would ship the drugs from India via Barbados.

On its website, PharmacyChecker indicates that Yahoo! advertiser CheapoDrugs.com is an approved Internet pharmacy and has a Canadian pharmacy license. However, the Internet pharmacy openly told us that the drugs we wanted to order would come from India and be routed through Barbados. The Internet pharmacy, which sometimes advertises on Yahoo! as a “Mexican pharmacy” (as shown below), indicates that it will ship to any country in the world EXCEPT Canada, because it would be illegal to do so -- a statement that makes little sense for a *bona fide* licensed Canadian pharmacy.

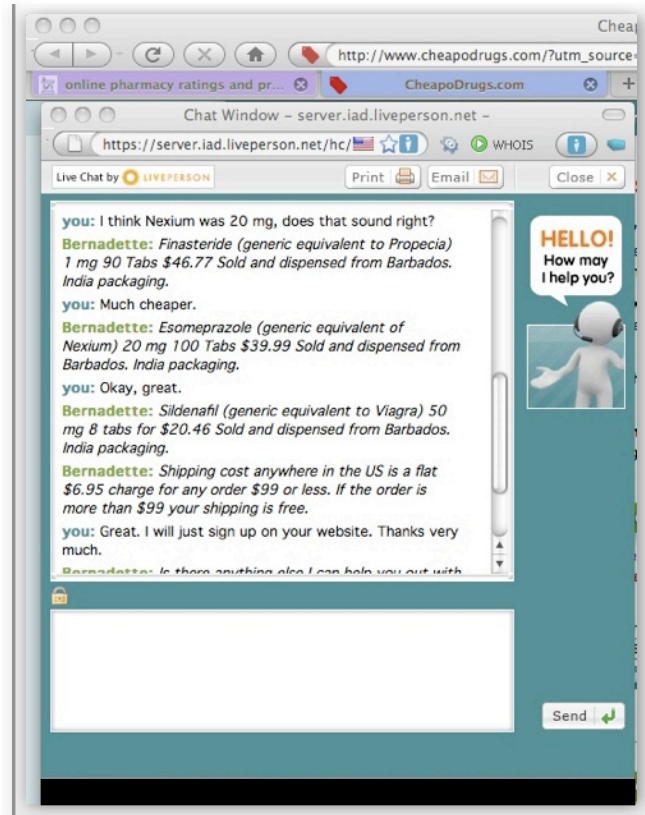


CheapoDrugs.com is a PharmacyChecker-approved “Canadian” Internet pharmacy advertiser for Yahoo!. However, it advertises as a “Cheap Mexican Pharmacy” and admitted to us in an online chat that the drugs actually are shipped from India via Barbados -- not Canada.

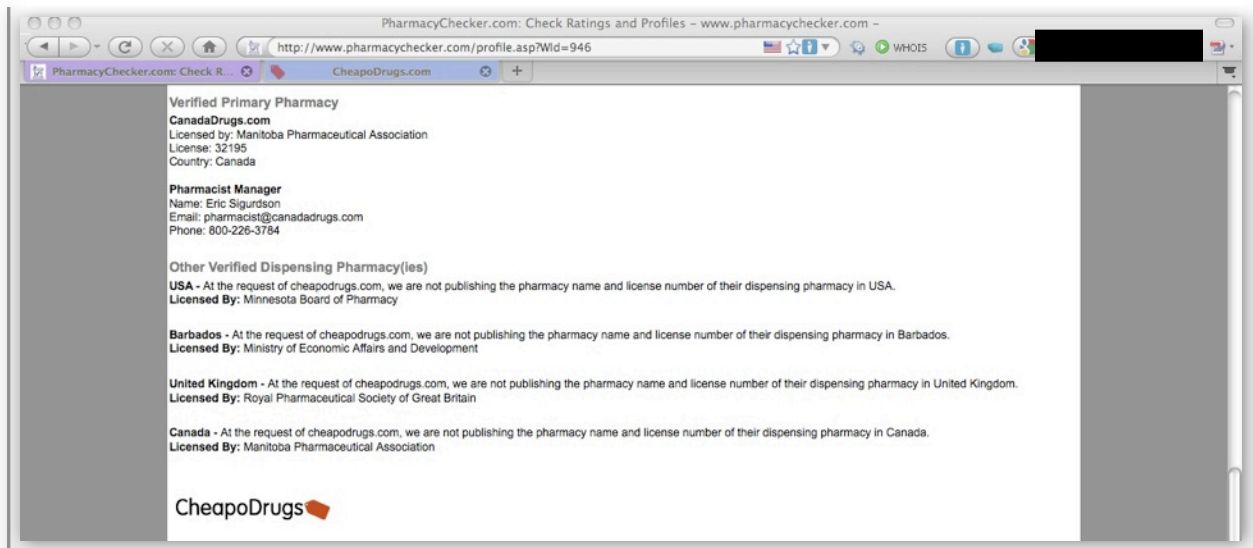
Analysis of Yahoo! Internet Pharmacy Online Advertisements

What's going on here -- is CheapoDrugs.com really a Canadian Internet pharmacy or not? If so, why is Canada the only country in the world where it won't fill prescriptions? The Internet pharmacy certainly gives the impression it is "Canadian": on its "Contact Us" page, it lists an address in Canada. PharmacyChecker.com cites Canadian pharmacy license number 32195 with the Manitoba Pharmaceutical Association -- the same license used by CanadaDrugs.com.¹⁰ All signs point to the pharmacy being Canadian. But scratch the surface and that illusion quickly falls apart.

We engaged CheapoDrugs.com in an online Live Chat and inquired about filling a prescription for generic versions of Viagra, Nexium and Propecia. We asked where those drugs would actually come from. **The answer: the drugs would be packaged in India, sold and dispensed from Barbados -- for all three drugs.** The drugs would not



In a live chat, Yahoo! advertiser CheapoDrugs.com admitted that the drugs it would sell us are not from Canada, but are packaged in India and sent from Barbados.



The PharmacyChecker page for CheapoDrugs.com, indicating that the website's "Primary Pharmacy" is CanadaDrugs.

¹⁰ This information was on PharmacyChecker.com's CheapoDrugs.com page until August 5th, 2009; at some point afterwards, the content was modified to read, "At the request of cheapodrugs.com, we are not publishing the pharmacy name and license number of their dispensing pharmacy" in Canada. However, the President of CheapoDrugs.com is still listed as Tom Haughton, who works or has worked for CanadaDrugs in Barbados.

Analysis of Yahoo! Internet Pharmacy Online Advertisements

be sent from Canada, nor is there any indication that the drugs would enter Canada at any point in time. This seems to violate Yahoo!'s policy of requiring Internet pharmacies to be based in the United States or Canada.

Drugs shipped to the patient from India via Barbados: is this how the Canadian healthcare system works? Do Canadians get their drugs from convoluted supply chains like this? Of course not. It would be illegal in Canada -- one reason that CheapoDrugs.com, supposedly a licensed Canadian Internet pharmacy, will do business in any country *except* Canada.¹¹ The stated reason in its FAQ section: in Canada, the importation of drugs is prohibited. (This FAQ conveniently ignores the fact that this is illegal in the United States as well.) This naturally raises the question: how is it, then, that CheapoDrugs.com can claim to have a Canadian pharmacy license?



If CheapoDrugs.com has a Canadian pharmacy license, why do they ship to any country in the world, EXCEPT Canada?

The short answer is that first, there is no licensed brick-and-mortar pharmacy in Canada called "Cheapo Drugs" (at least, one linked to this website). Rather, CheapoDrugs.com uses its affiliation with CanadaDrugs.com to "share" its license in order to refer to itself as Canadian and get permission to advertise with Yahoo!. But CheapoDrugs.com doesn't actually use the Canadian pharmacy license for its intended, legitimate purpose -- dispensing drugs within Canada. It uses the Canadian license to gain entry to Yahoo!'s advertising program and market itself on the Internet as Canadian, but then reroutes prescriptions to affiliated drug suppliers in India, Turkey and other countries, facilitating the illegal shipment of prescription drugs into the US. This set-up violates US laws and Yahoo!'s stated policies, and essentially facilitates participation in Yahoo!'s ad program by drug suppliers who would not otherwise be permitted to participate.

¹¹ To briefly explain the relevant aspect of Canadian drug law, "Schedule F" drugs include the three drugs we asked about (indeed, most or all prescription drugs) and require a valid prescription in Canada. Canadian law and Health Canada policy prohibits the importation by mail of these substances. See Health Canada's [webpage](#) on this issue (specifically, the rules on importing Schedule F drugs) for further detail.

Analysis of Yahoo! Internet Pharmacy Online Advertisements

It would also violate Canadian laws, which is why CheapoDrugs.com will not import prescription drugs into Canada.¹² As long as it refrains from doing so, the Manitoba pharmacy board, and Canadian government, will generally not have jurisdiction to stop these drug shipments, because they never enter Canada; likewise, they not have legal grounds to take away a Canadian pharmacy license, even one that is never used as anything but a facade.

Consider also PharmacyChecker's records for CheapoDrugs.com and CanadaDrugs.com. Both list the "primary dispensing pharmacy" as being in Canada, but also identify a "pharmacy" in Barbados. The entry states that "(a)t the request of cheapodrugs.com, we are not publishing the pharmacy name and license number of their dispensing pharmacy in Barbados," but that it is licensed by the "Ministry of Economic Affairs and Development." This raises the obvious question: if Yahoo!'s policy requires pharmacies to be based in the US or Canada, why are websites that may instead divert some prescription drug orders outside of those countries allowed to advertise?¹³

Let's briefly digress to ask another question: what about CanadaDrugs.com, the company whose pharmacy license CheapoDrugs.com uses? (CanadaDrugs.com is also an approved Yahoo! advertiser.) If it is a *bona fide* Canadian pharmacy, why would it permit CheapoDrugs.com to use its pharmacy license to falsely identify itself as Canadian? Part of the answer is that CheapoDrugs.com appears to be a business affiliate of, and is or has been owned by, CanadaDrugs.com.¹⁴ Another important observation is that CanadaDrugs.com operates, or has recently operated, in a similar way: it doesn't ship drugs from Canada, but rather from India via Barbados, and other locations including Turkey.

11. Customers may direct any questions or enquires with respect to our practices or your personal information by contacting our Privacy Officer, as follows:

Cheapo Drugs
Unit 2 - 28 Warrens Industrial Park
St Michael, Barbados
BB22026
Attention: Privacy Officer

Yahoo!'s policy requires Internet pharmacy advertisers to be based in the US or Canada. CheapoDrugs.com's privacy policy indicates an address in Barbados. The drugs are from India, routed through Barbados.

¹² In addition to the previous footnote that cites Canadian law prohibiting the importation via mail of Schedule F (prescription) drugs, we contacted Health Canada to make sure that there is no personal use importation policy, et cetera, authorizing prescription drugs to be imported in Canada. There is not.

¹³ Moreover, although we have not been able to confirm this, it appears that the Ministry of Health, not the Ministry of Economic Affairs and Development, may be the entity that licenses pharmacies in Barbados. The Ministry of Economic Affairs and Development would, however, license businesses in general, such as a warehouse used as a transit point for repackaging prescription drugs from India. We are working to confirm this.

¹⁴ Consider that historical domain registration indicates that CheapoDrugs.com was recently registered to Tom Haughton, who is or recently was a CanadaDrugs.com employee (incidentally, in Barbados). Also, CheapoDrugs' website is on an IP address block allocated to CanadaDrugs.com by RackSpace, the website's host.

Analysis of Yahoo! Internet Pharmacy Online Advertisements

Consider the judicial findings in a little-noticed trademark case in the United Kingdom in 2008.¹⁵ A panel of judges noted that despite having a Canadian pharmacy license, CanadaDrugs.com was not dispensing drugs to US residents directly from a licensed Canadian pharmacy, but was actually relabeling Turkish packages to appear as if they had been dispensed by a licensed pharmacy in the United Kingdom.

The common argument in favor of allowing Americans to order from licensed Canadian Internet pharmacies goes like this: they are equally as safe as, and provide substantially the same drug safety protections as US pharmacies, and in many cases are cheaper. But this argument assumes that the drugs are actually shipped from an authentic Canadian pharmacy -- not India or Barbados -- and are dispensed in accordance with Canadian drug safety regulations. Indeed, if one physically walked into a pharmacy located in Canada to fill a prescription, for all practical purposes, the drugs would be equivalent in quality and safety. But does this argument hold true for licensed “Canadian” Internet pharmacies? Certainly not for websites like CheapoDrugs.com that appropriate, or are allowed to appropriate, the license of a Canadian pharmacy to feign legitimacy and subsequently ship drugs from India via the Caribbean.

In short, just because a licensed Canadian pharmacy allows a website to claim its pharmacy license as its own does not mean that the prescriptions orders will be sent to, or the drugs will physically come from, that licensed Canadian pharmacy, or from or through Canada at all. Whatever one may think about ordering drugs that are truly from Canada, to suggest that US residents are receiving the same oversight and protections that a Canadian resident would from Internet pharmacies like CheapoDrugs.com is demonstrably false. It is beyond dispute that this Internet pharmacy violates US law, and would violate Canadian law were it to ship “Schedule

¹⁵ This was a case about trademark violation, not counterfeit drugs, and occurred in the United Kingdom. CanadaDrugs.com was not the defendant in this case, but one of its alleged pharmaceutical suppliers was. A full reading of the text that these passages were excerpted from notes that in this case, the Turkish drugs sold by CanadaDrugs.com were not counterfeit, and a prescription was required. However, in other cases, such as the RxNorth.com case of 2006, a licensed Canadian Internet pharmacy that re-routed its orders in this way was found by the FDA to be dispensing counterfeit drugs. In the case referred to in this report, the judge, Lord Justice Jacob, found:

Patients in the US purchase and get drugs in the following way...they order the (prescription) from a Canadian company over its website, canadadrugs.com. (...) The Canadian company then places an order with a Turkish company. The dispensing label stuck on the product bears the words Complete Care Pharmacy (*authors note: Complete Care is a licensed UK pharmacy*) and gives a Post Office Box in (the) United Kingdom...(but the prescription drugs) never see the light of day in Europe. (See Lord Justice Jacob, *Eli Lilly & Co. vs. 8PM Chemist, Ltd.* [2008] EWCA Civ 24.)

In other words, prescriptions sent to CanadaDrugs.com were not filled with a Canadian pharmacy, but -- in that particular case -- were rerouted to a Turkish company. And even though labels gave the customers the impression that the drugs came from a pharmacy in the United Kingdom, another country with safe pharmaceutical practices, the drugs actually “never (saw) the light of day in Europe,” but were merely relabeled there in order to give the appearance of being from a licensed pharmacy in the United Kingdom. To say the least, this is misleading.

Analysis of Yahoo! Internet Pharmacy Online Advertisements

F” (prescription) drugs to a Canadian resident from the same places it ships drugs from into the United States.¹⁶

This is an opportunity for Yahoo! to clarify its policy on advertisers that mail drugs to US residents from countries like India. The authors question how, if an Internet pharmacy openly advertises as Mexican, ships drugs manufactured and packaged in India and routed through Barbados, does not actually ship from or through a licensed Canadian pharmacy, and will ship to any country except Canada because its pharmacy practices would violate Canadian laws, it can be considered “based in Canada” -- and how it can therefore comply with Yahoo!’s standards, let alone US pharmacy laws and regulations. Merely stating that CheapoDrugs.com (and/or CanadaDrugs.com) has a pharmacy license in Canada is not an adequate explanation for the reasons outlined above.

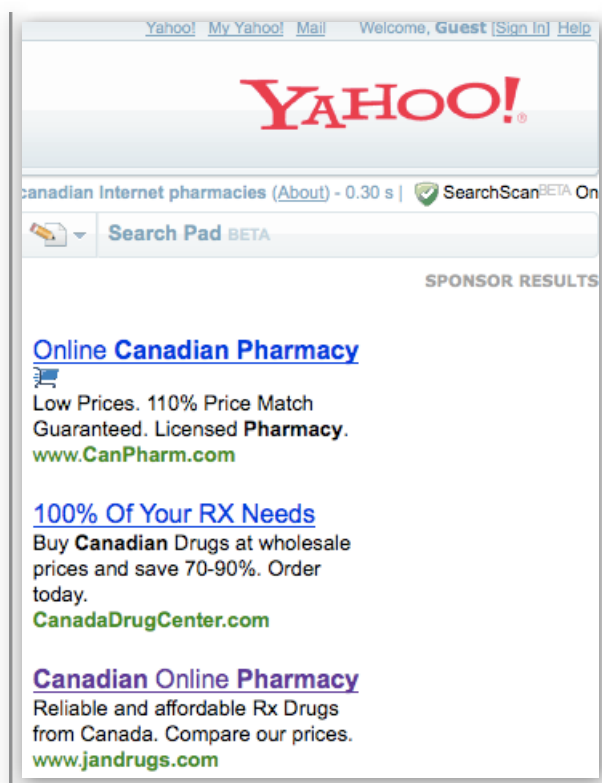
¹⁶ It is worth noting that this is precisely the reason that the FDA has stated that ordering from Canadian Internet pharmacies is not legal. It isn’t really because of safety concerns about drugs that would actually come from authentic Canadian pharmacies. It is because there isn’t any way to ensure that even a licensed Canadian pharmacy won’t just divert prescriptions to a country like India or China and have a supplier send the prescription drugs from there, given the absence of an international pharmacy enforcement authority. As it turns out, that’s exactly what’s happening.

Analysis of Yahoo! Internet Pharmacy Online Advertisements

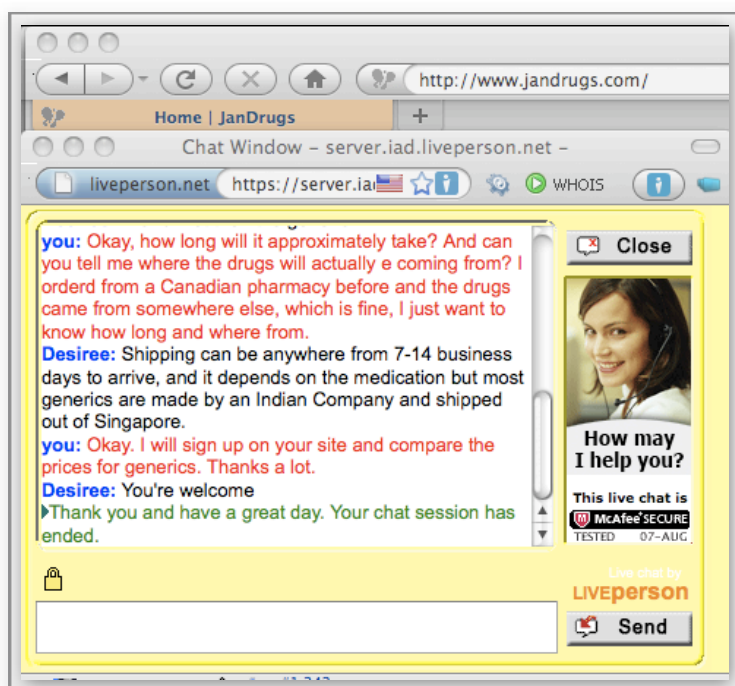
IV. Rogue Internet pharmacy ad #4: JanDrugs.com

Like CheapoDrugs.com, JanDrugs.com is an approved advertiser on Yahoo!, and advertises as a “Canadian Online Pharmacy: Reliable and Affordable Rx Drugs from Canada.” As with the earlier example, Jan Pharmacy has a Canadian pharmacy license in Manitoba. It also maintains a separate website for Canadian residents: jandrugs.ca.¹⁷ Despite the presence of a Canadian pharmacy license, in a Live Chat with JanDrugs.com, the website admitted that the drugs (at least those that we asked about that would be ordered from jandrugs.com) do not come from Canada, but rather are “made by an Indian company and shipped out of Singapore.”

The reasons that this is illegal have largely been explained earlier in this document. To take a new angle on the problem, consider the public health consequences of deceptive Yahoo! advertisers like JanDrugs.com. Internet users may well assume that Internet pharmacies like JanDrugs.com are actually selling drugs that are shipped from a Canadian pharmacy (as JanDrugs advertises on Yahoo!, above right) and in accordance with Canadian laws and drug safety regulations. While JanDrugs.com does appear to operate a brick-and-mortar pharmacy in Canada (accessible via jandrugs.ca), which very well may supply genuine Canadian medications to Canadians, at least some of the drugs are from India via Singapore. As with CheapoDrugs.com, the presence of a Canadian pharmacy license is irrelevant to those drug shipments. A legitimate Canadian pharmacy sources its drugs from



JanDrugs.com advertises as a Canadian pharmacy selling drug from Canada, but...



...if it is a licensed Canadian pharmacy, why is it sending us drugs made by an Indian company and shipped out of Singapore?

¹⁷ JanDrugs.ca says, “This site is intended for Canadians only. If you are located outside of Canada, please click [here](http://www.jandrugs.com) (jandrugs.com).”

Analysis of Yahoo! Internet Pharmacy Online Advertisements

approved Canadian suppliers, not “an Indian Company” that routes drugs via Singapore.

Both JanDrugs.com and CheapoDrugs.com illustrate an important point: even if a business has a Canadian pharmacy license (and, in the case of JanDrugs.com, has a legitimate business within Canada supplying approved Canadian drugs to Canadian customers) it is not operating as a Canadian pharmacy when it turns around and reroutes prescription drug orders to, and ships drugs from, a location like India or Singapore. In that case, it is acting as an Indian pharmacy or a Singapore pharmacy. Not inconsequentially, these orders violate US law and would violate Health Canada regulations were the drugs imported into Canada. An additional layer of concern rests in the fact that many consumers, wanting cheaper drugs and thinking that a trusted source like Yahoo! would only allow true Canadian pharmacies adhering to Canadian law to advertise, might order from these sites and receive substandard, counterfeit, or otherwise harmful “medications”. There is well-established precedent for this concern.¹⁸

In some cases, these “Canadian” Internet pharmacies may state that they do test the prescription drugs from India, Singapore or other locations for authenticity; that the drugs are from an “FDA-approved facility” (e.g., in India), and that the primary reason that they route prescriptions to these countries is out of a heartfelt concern for American consumers who are forced to pay unreasonably high prices for drugs. High drug prices are a legitimate concern. But there are several problems with these statements. First, facilities do not become FDA-approved -- drugs and medical devices do.¹⁹ As part of its drug approval process, the FDA may inspect a foreign manufacturer, but it then places strict controls on where, when and how those drugs can be shipped to companies (not individuals) in the United States under strict guidelines designed to ensure safety and prevent counterfeits or knock-offs from entering the drug supply. The facility is only part of the equation. Second, it is nonsense to suggest that the motive is altruistic: pharmacies are businesses. As a marketing tactic, it is brilliant: US residents who would otherwise be squeamish about ordering drugs from India, Turkey or Singapore are led to believe that they are receiving the drug safety protections afforded Canadian residents by Health Canada, and the licensed Canadian Internet pharmacies can re-route these orders to a cheaper foreign supplier, thus enjoying lower costs and higher profit margins. This is about money.

These websites deserve closer scrutiny before being allowed to advertise to US consumers. In the case of Internet pharmacies operating outside the boundaries of any jurisdictional oversight, a Canadian license alone does not ensure patient safety. The ways in which ordering from JanDrugs.com violates US law and Yahoo!’s stated policy can be quickly discovered. As with the earlier example, the authors pose the question of how and why JanDrugs.com -- despite the presence of a Canadian pharmacy license -- can be considered Canadian if it dispenses prescription drugs from India via Singapore.

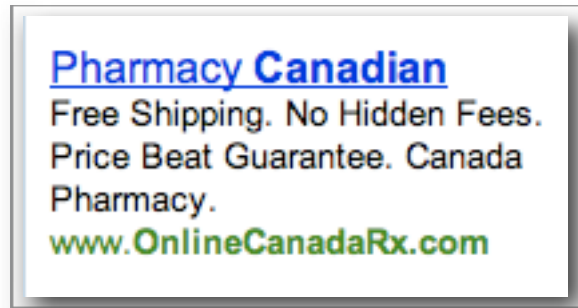
¹⁸ It is worth noting that RxNorth.com, an approved advertiser in 2006 and 2007, was [found by the FDA](#) to be selling counterfeit drugs. RxNorth followed the general business model described in the examples regarding CheapoDrugs.com and JanDrugs.com.

¹⁹ For an excellent explanation of how this works, see [FDA Congressional testimony](#) from 2007.

Analysis of Yahoo! Internet Pharmacy Online Advertisements

V. Rogue Internet pharmacy advertiser #5: OnlineCanadaRx.com

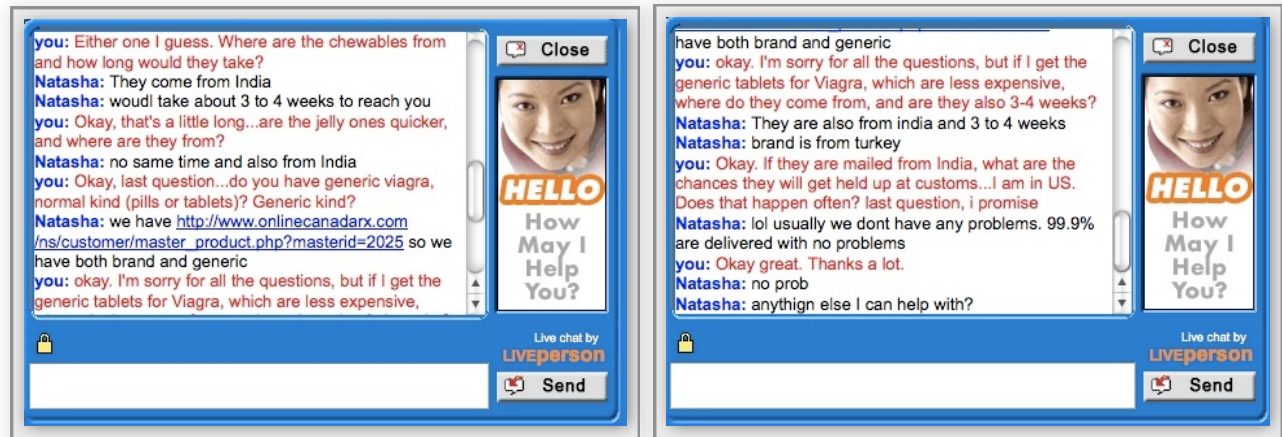
Although the last two examples highlighted foreign suppliers utilizing a Canadian license, we believe it's important to include one more brief example to emphasize that this is not an aberration, but a trend. US law prohibits the importation of prescription drugs from outside of the United States, and with good reason: directly importing prescription drugs has been shown to significantly increase the risk that drugs are counterfeit, adulterated, or otherwise substandard. As noted in the prior two examples, Yahoo!'s stated policy requires Internet pharmacy advertisers to be based in the US or Canada. This policy appears to be based on the assumption that drugs purchased from Canadian online pharmacies meet the standards of drugs purchased at legitimate US or Canadian brick-and-mortar pharmacies. In addition to our previous findings, this example further deflates that assumption.



OnlineCANADARx.com advertises as "Pharmacy Canadian" and "Canada Pharmacy." Is it Canadian?

In this instance, another licensed Canadian pharmacy advertiser -- OnlineCanadaRx.com -- has again gained entry into Yahoo!'s advertising program by stating that it refers its prescription drug orders to be filled by a licensed Canadian pharmacy, AYC pharmacy in British Columbia. Are some filled by AYC pharmacy? Perhaps -- but OnlineCanadaRx.com informed us that the drugs we asked about would not actually come from Canada, but from India or Turkey.

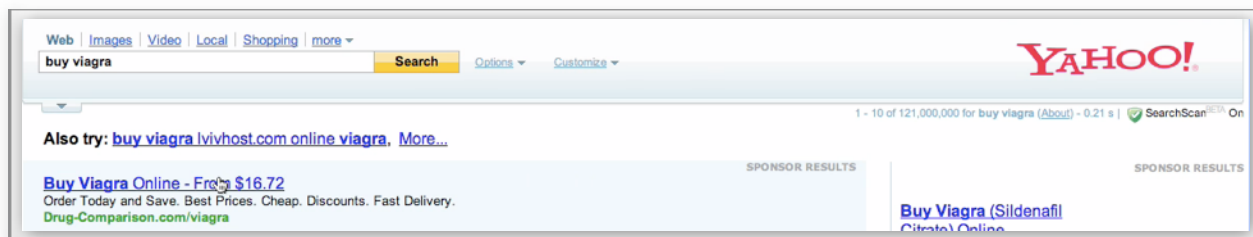
The transcript of the Online Chat that we conducted with OnlineCanadaRx.com leaves little doubt that this "Canadian" pharmacy is mailing drugs from India and/or Turkey:



Internet pharmacies like OnlineCanadaRx.com, CheapoDrugs.com, and JanDrugs.com all use the same tactic of boasting a Canadian pharmacy license, yet openly admit to sourcing their drugs from far off places like Singapore and India. It did not take the authors long to determine that these supposedly legitimate Canadian pharmacies were nothing of the sort. Again, we question how OnlineCanadaRx.com, et al, meets Yahoo!'s requirement of being "based in the US or Canada."

Analysis of Yahoo! Internet Pharmacy Online Advertisements

VI. Rogue Internet Pharmacy Advertiser #6: Drug-Comparison.com



drug-comparison.com, a Yahoo! advertiser that alternates between content that seems to meet Yahoo's standards, and content that directs users to a fake Internet pharmacy controlled by GlavMed, a notorious Russian spamming organization.

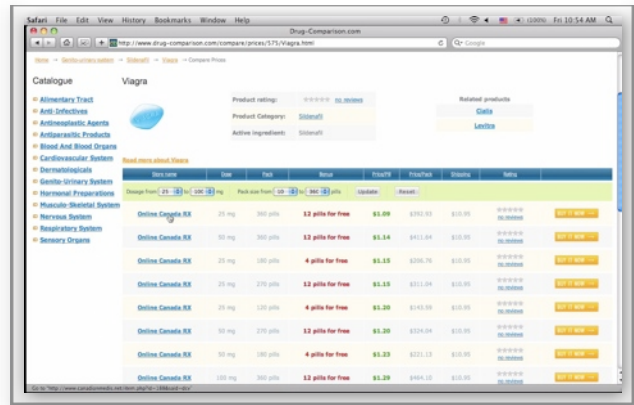
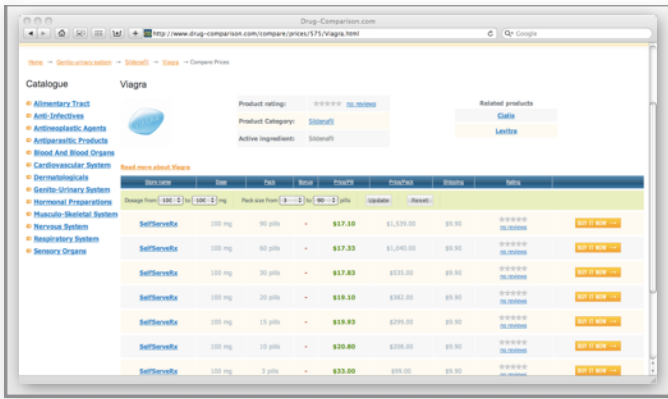
Our sixth example of an illicit Yahoo! Internet pharmacy advertiser is not an Internet pharmacy, but what is known as an "affiliate". As such, Drug-Comparison.com does not directly sell prescription drugs. Instead, it offers a list of prescription drug prices, and Internet users can "click through" to the Internet pharmacy of their choice. That would be fine, as long as the Internet pharmacies are legitimate. It is important to remember that Yahoo! policy imposes the same requirements upon Internet pharmacy affiliates as it does upon Internet pharmacies, including PharmacyChecker approval. Drug-Comparison.com is therefore a direct extension of whichever Internet pharmacy it links its users to.

Drug-Comparison.com is an Internet pharmacy affiliate that does not act in accordance with Yahoo!'s policy. On some occasions, clicking on a Drug-Comparison.com advertisement returns a list of prices for SelfServeRx.com, which is an affiliate of a licensed Utah pharmacy called KwikMed.²⁰ (Both are PharmacyChecker-approved.) But, on other occasions -- frequent occasions -- Drug-Comparison.com redirects Internet users to no-prescription-required websites such as canadianmedis.net. Canadianmedis.net is run by GlavMed, a fake Internet pharmacy and spam organization run largely by Russian organized crime. A fuller discussion of GlavMed websites, and why the authors describe their Internet pharmacies as fraudulent, no-prescription-required Internet pharmacies engaged in the sale of counterfeit medications, is available in our Microsoft report.

Over the last several months, the authors have watched **Drug-Comparison.com** carefully. Although Drug-Comparison.com engages in a "bait and switch" scheme, it is not the case of a website or an advertisement being "hijacked." The alternating content between SelfServeRx.com and fake Internet pharmacies like canadianmedis.net has been going on for months, and the content has switched on at least a dozen occasions over the last several months. Moreover, it cannot be described as "hijacked" because the Internet user is redirected to canadianmedis.net only after accessing a page within Drug-Comparison.com.

²⁰ Drug-Comparison.com is an affiliate of SelfServeRx.com. To make matters somewhat more complicated, SelfServeRx.com is itself an "affiliate" of a licensed Internet pharmacy in Utah called KwikMed (kwikmed.com).⁸ While SelfServeRx.com falls short of National Association of Boards of Pharmacy Internet pharmacy standards, the reasons for that are somewhat complicated, and are not the subject of this report. For the sake of this discussion, we simply note that KwikMed.com does have a Utah pharmacy license, and that both SelfServeRx.com and KwikMed.com are PharmacyChecker approved.

Analysis of Yahoo! Internet Pharmacy Online Advertisements



On the left, the “legitimate” content of drug-comparison.com as accessed by a Yahoo! ad. On the right, the illegal version of drug-comparison.com, including a fake no-prescription-required Internet pharmacy run by Russian organized criminal organization GlavMed, accessed by the same Yahoo! ad on a different day.

Could it have been ascertained that Drug-Comparison.com is an affiliate of rogue Internet pharmacies? Yes -- in a matter of seconds. Not only does the website direct users to rogue Internet pharmacies from within its site, it also shares a virtual “home” with dozens of rogue Internet pharmacies. The website Drug-Comparison.com shares an IP address (94.76.216.196) with 47 other websites, including canadianmedis.net, the rogue GlavMed pharmacy that Drug-Comparison.com sometimes redirects users to. With the exception of some pornography websites, every website on this IP address sells prescription drugs without a prescription. Most or all of these Internet pharmacies are GlavMed affiliates. It is hard to argue that they’re not related.

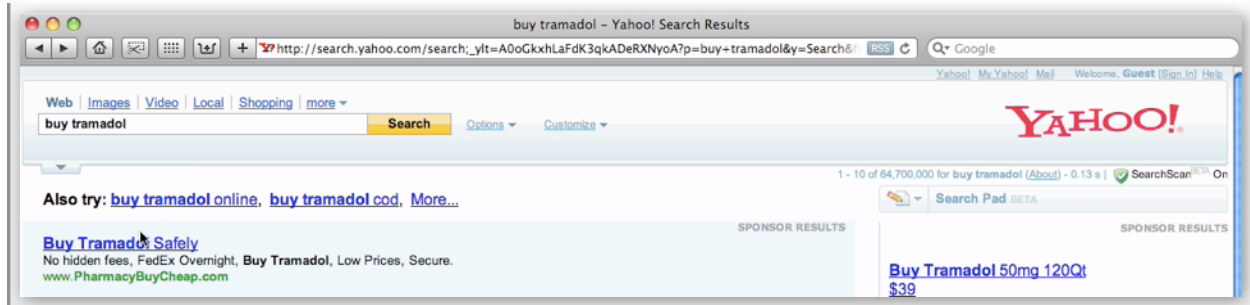
What’s more, both canadianmedis.net and drug-comparison.com are currently registered anonymously, but historical registration information, as of late 2008 or early 2009, gives an identical email address, dexiro @ gmail.com. These facts point to common control of Drug-Comparison.com and canadianmedis.net. Drug-Comparison.com’s strong connections to rogue Internet pharmacies should have precluded it from being permitted to advertise as an affiliate.



The PharmacyChecker-approved website on the left, and the rogue GlavMed no-prescription-required content on the right -- another example of how criminal organizations use affiliate relationships to become Yahoo! advertisers.

Analysis of Yahoo! Internet Pharmacy Online Advertisements

VII. Rogue Internet pharmacy advertiser #7: PharmacyBuyCheap.com

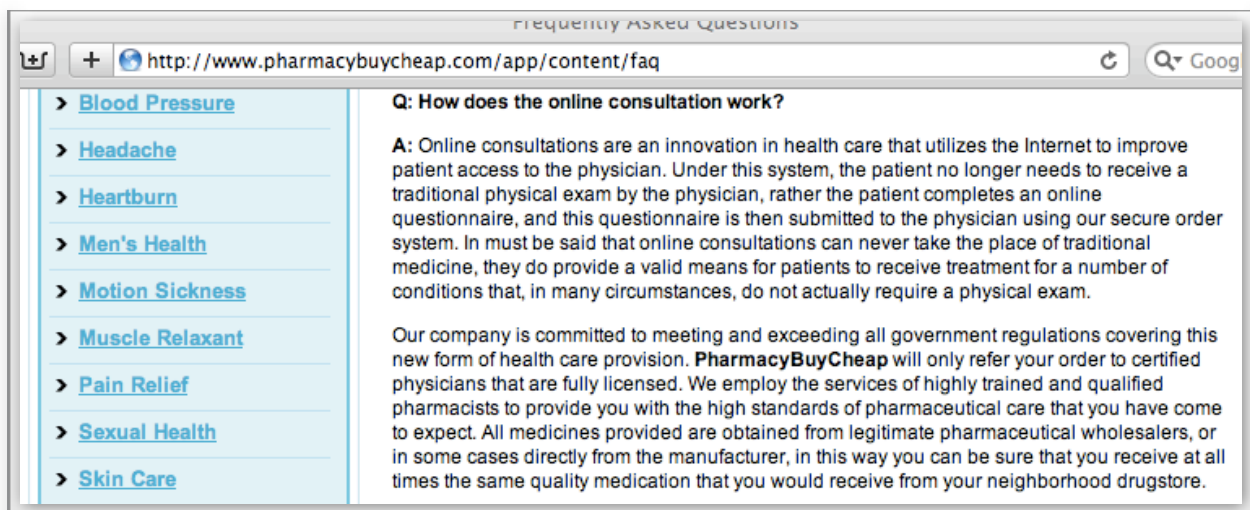


PharmacyBuyCheap.com, a Yahoo! advertiser, does not require a valid prescription for the sale of prescription drugs.

Our seventh Yahoo! rogue Internet pharmacy advertiser is PharmacyBuyCheap.com, an Internet pharmacy that does not require a valid prescription for the sale of prescription drugs. Again, this violates US federal law, every state law, and Yahoo!'s stated standards.

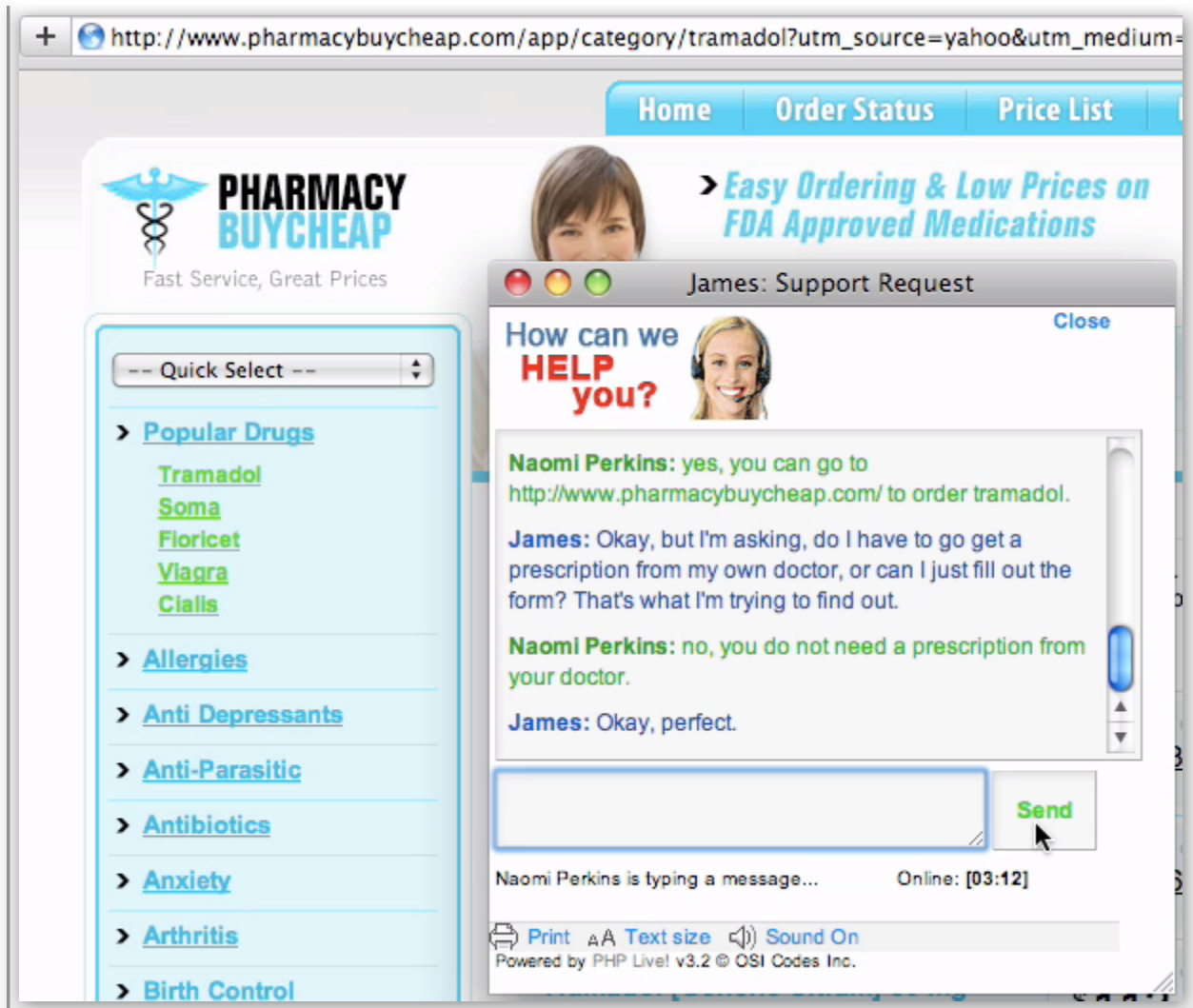
PharmacyBuyCheap.com has been a frequent advertiser on Yahoo! for months. The website offers potentially addictive medications, including Soma (a muscle relaxant), Tramadol (a pain reliever) and Fioricet (a migraine medicine). In this case, a test purchase was unnecessary to confirm that PharmacyBuyCheap.com sells prescription medications without requiring a prescription. A quick browsing of the website and a Live Chat told us what we needed to know.

First, the website's FAQs discuss an "online consultation," which describes a circumstance where a patient is not required to have a physical examination, but can instead simply fill out a form. This is generally indistinguishable from selling prescription drugs without requiring a prescription, and is not the basis for a valid prescription, with an extremely limited number of exceptions that do not apply in this case. It also violates Yahoo!'s stated standards.



[Analysis of Yahoo! Internet Pharmacy Online Advertisements](#)

Second, we engaged the website in a Live Chat. As shown below, the website's representative told us that we would "not need a prescription from (our) doctor" to order a prescription drug.



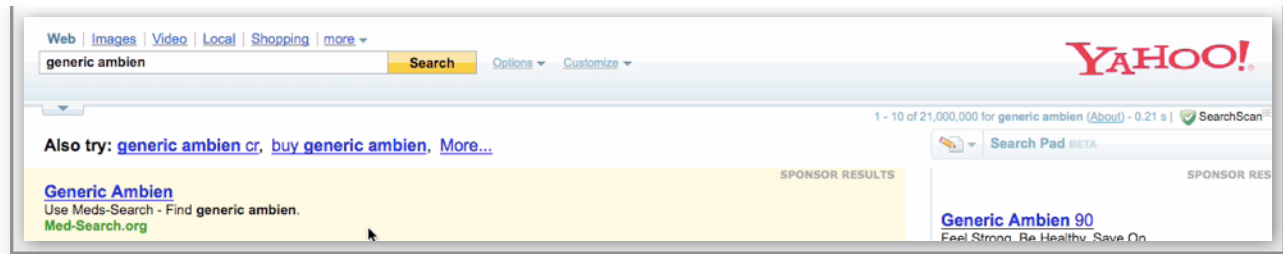
The screenshot shows a web browser window with the URL http://www.pharmacybuycheap.com/app/category/tramadol?utm_source=yahoo&utm_medium=. The website header includes navigation links for Home, Order Status, and Price List. The PharmacyBuyCheap logo is prominently displayed with the tagline "Fast Service, Great Prices". A banner advertises "Easy Ordering & Low Prices on FDA Approved Medications". A sidebar menu lists various drug categories: Popular Drugs (Tramadol, Soma, Fioricet, Viagra, Cialis), Allergies, Anti Depressants, Anti-Parasitic, Antibiotics, Anxiety, Arthritis, and Birth Control. A live chat window titled "James: Support Request" is overlaid on the page. The chat transcript shows Naomi Perkins providing a URL to order tramadol, James asking if a prescription is needed, and Naomi confirming that no prescription is required. The chat interface includes a "Send" button and a status indicator that says "Naomi Perkins is typing a message... Online: [03:12]".

PharmacyBuyCheap.com, a Yahoo! advertiser, told us that we could order tramadol, a potentially addictive pain reliever, without a prescription from our doctor. This is illegal.

Again, the authors emphasize that this Internet pharmacy did not appear to simply hijack another landing page or website: it has been a Yahoo! advertiser for several weeks, even months.

Analysis of Yahoo! Internet Pharmacy Online Advertisements

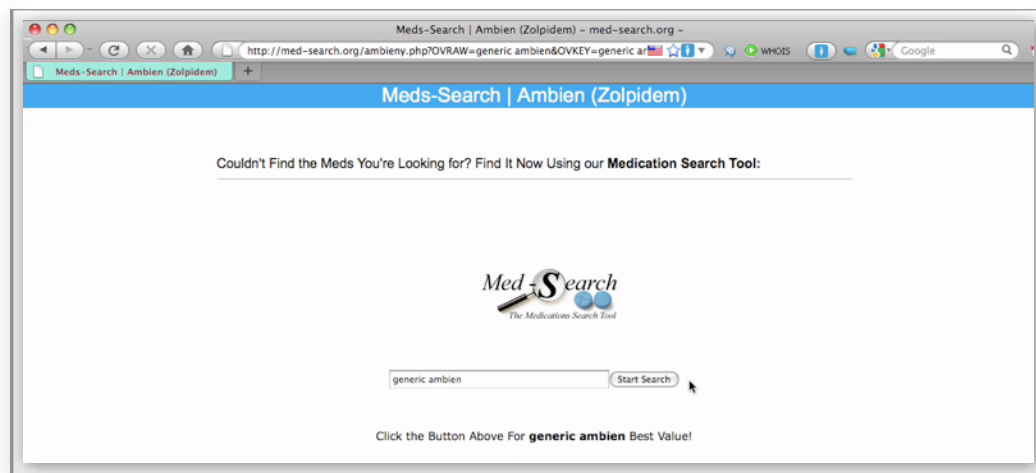
VIII. Rogue Internet pharmacy advertiser #8: Med-Search.org



Yahoo! advertiser med-search.org is a “mini search engine” that acts as a conduit to no-prescription-required Internet pharmacies selling controlled substances without requiring a prescription.

The eighth example of an Internet pharmacy advertiser on Yahoo! is Med-Search.org. While this website is not strictly an Internet pharmacy, it operates as a “mini search engine” for Internet pharmacies. Med-Search.org allows Internet users to search for controlled substances and only lists websites that do not require a prescription, in blatant violation of federal and state laws. This is particularly dangerous because unlike “lifestyle drugs”, i.e. Viagra, Propecia, controlled substances are drugs that can create addiction and dependency. Controlled substances include drugs like Vicodin and Oxycodone -- highly potent and highly addictive substances. The online sale of controlled substances was also the subject of recent US legislation: the Ryan Haight Online Pharmacy Act. This law was enacted to impose strict regulations on any online pharmacy offering to sell controlled substances because of the danger of these drugs when used without medical supervision.

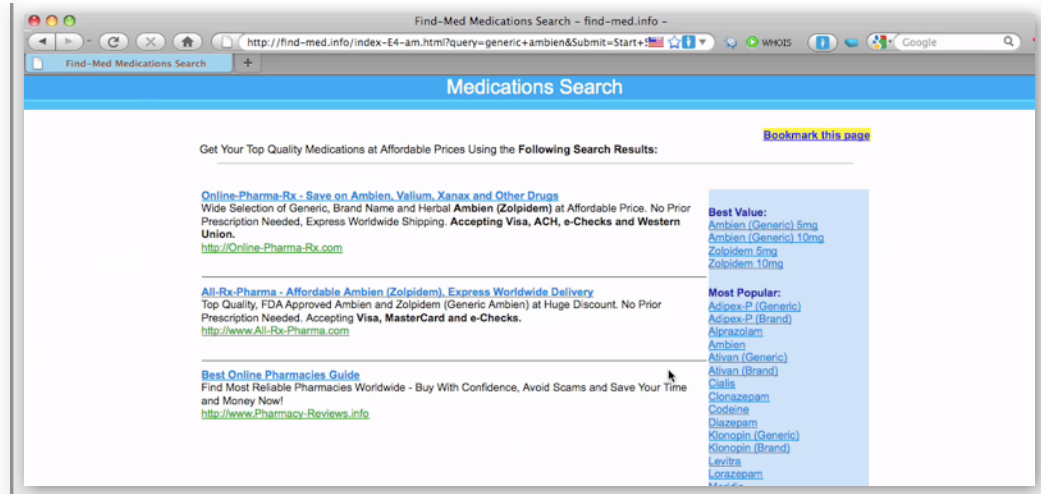
Clicking on the med-search.org advertisement leads to med-search.org, where the drug searched for is automatically listed in the search box.



Clicking on the Yahoo! ad for med-search.org leads to that website, where the drug one searched for on Yahoo! is already pre-filled in.

Clicking on “Start Search” then redirects to find-meds.info (see below), which typically lists three to four “Internet pharmacies.”

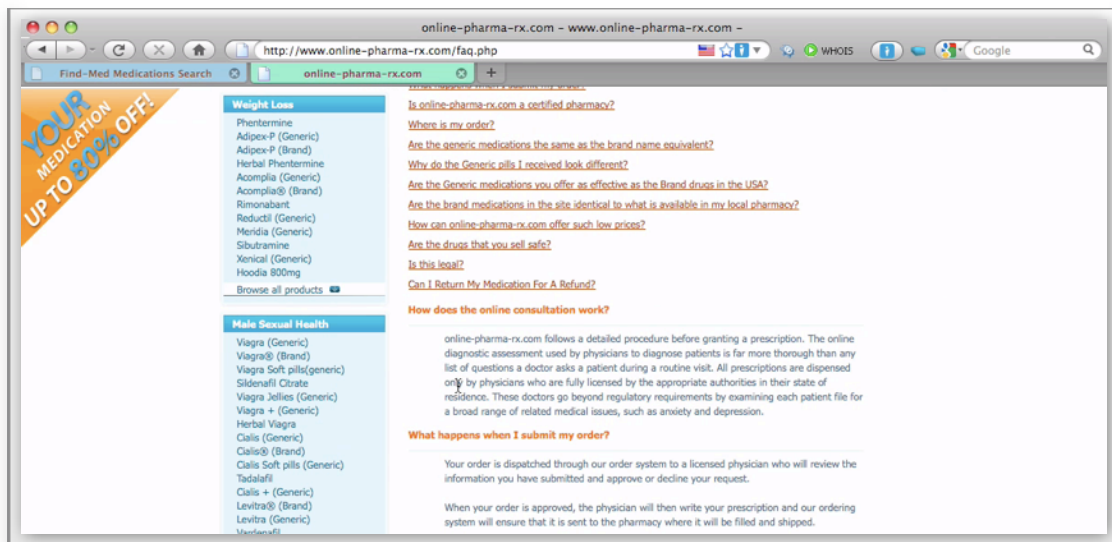
Analysis of Yahoo! Internet Pharmacy Online Advertisements



From within med-search.org, searching for a drug redirects the Internet user to find-med.info.

The websites listed at find-med.info illegally sell controlled substances without a prescription from overseas.

The user can then select any one of the results. To provide one example, online-pharma-rx.com (the top result) illegally offers to provide an “online consultation” for controlled substances (meaning, it will sell the drug without requiring an in-person visit to a physician). This is a violation of the federal Controlled Substances Act, and is considered the same as selling this prescription drug without requiring a prescription. Most of the websites listed on med-search.org/ find-meds.info are affiliates of a criminal network called Rx-Commission. Past test purchases have resulted in drugs arriving from India without a prescription.



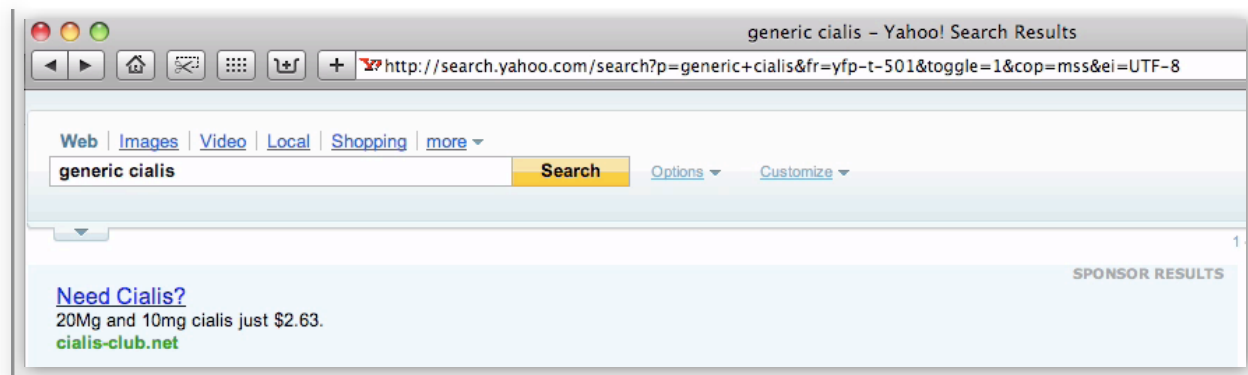
Although med-search.org is not an online pharmacy itself, its sole purpose is to link users with rogue Internet pharmacies via a search engine. What’s more, med-search.org allows searches for controlled substances- the most dangerous and addictive prescription drugs available. The

Analysis of Yahoo! Internet Pharmacy Online Advertisements

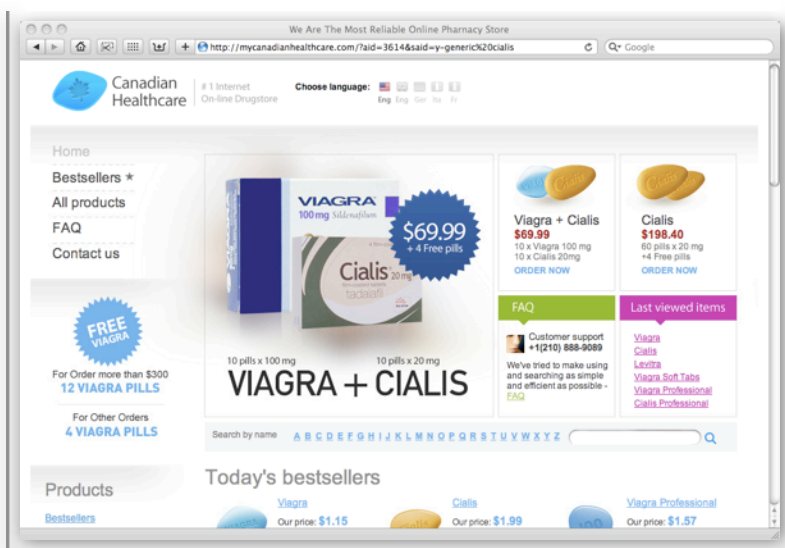
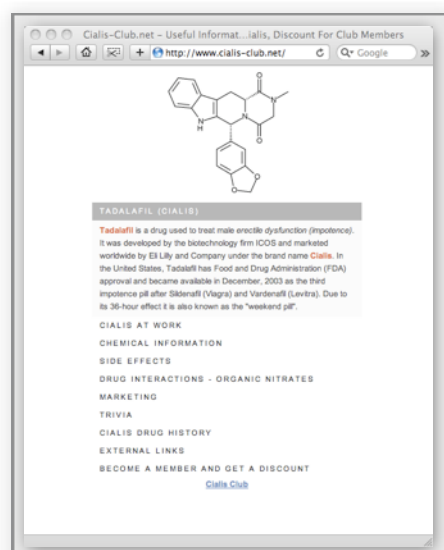
searches lead users to rogue online pharmacies that sell controlled substances without requiring a prescription -- a blatant violation of the Ryan Haight Online Pharmacy Act. Remember that in order to advertise in the Internet pharmacy space, a website must comply with Yahoo!'s stated policy which includes acting lawfully. Profiting from ads posted by med-search.org is hardly different than profiting from ads posted by rogue Internet pharmacies themselves.

Analysis of Yahoo! Internet Pharmacy Online Advertisements

IX. Rogue Yahoo! Internet pharmacy advertiser #9: cialis-club.net



Cialis-club.net is an example of a website that appears to have gained entry into Yahoo!'s advertising program by pretending to be merely informational, when it actually operates as a rogue Internet pharmacy. This ad has been displayed for several weeks. [Clicking](#) on a cialis-club.net advertisement leads to a rogue Internet pharmacy that sells potentially counterfeit medication without requiring a prescription. The website is registered to an individual in the Ukraine, and the fake Internet pharmacy is an affiliate of GlavMed, the world's foremost pharmaceutical spam organization.



The two faces of cialis-club.net: To the left, cialis-club.net as it appears when typed into a browser -- an informational site. To the right, cialis-club.net as accessed via a Yahoo! ad which redirects to a rogue Internet pharmacy.

This particular website does something especially misleading. If you simply visit cialis-club.net -- not via an advertisement -- it appears to be an informational site that provides facts about Cialis. It talks about the chemical composition, marketing, and history of the drug, and does not appear to have an ordering section at all. But, if you access cialis-club.net by clicking on its Yahoo! ad, something very different happens. The advertisement for cialis-club.net **does** briefly

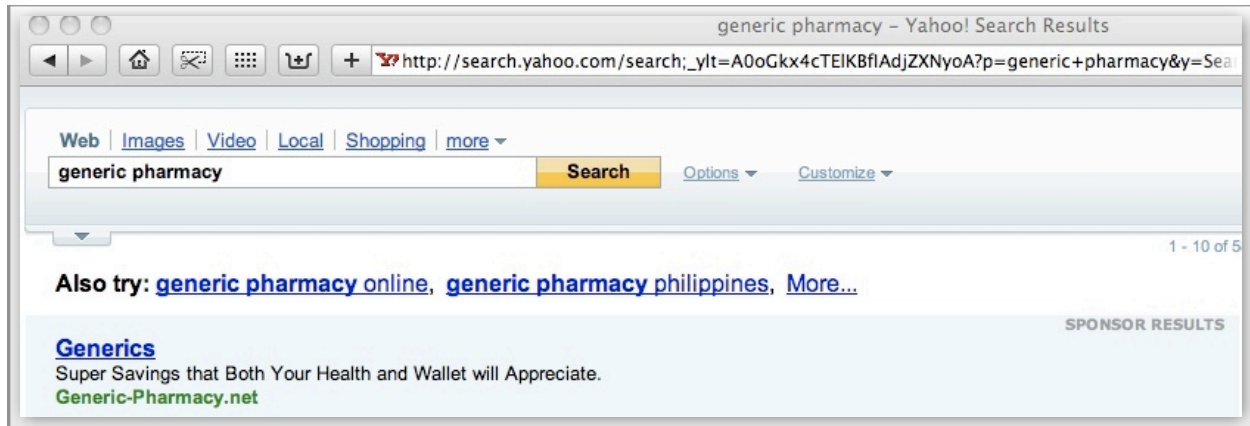
Analysis of Yahoo! Internet Pharmacy Online Advertisements

lead to cialis-club.net (indicating that the advertisement has NOT been hijacked), but cialis-club.net immediately redirects the Internet user to mycanadianhealthcare.com. This website is a fake Internet pharmacy that has nothing to do with Canada, and is part of the criminal GlavMed organization that has been documented as selling prescription drugs without a prescription from outside of the country.

Could this have been prevented? Of course. First, there are only three other websites on this IP address; the authors have already publicly documented one of them (askpanda.com) pulling the same stunt on bing.com. Second, why would the website owner (located in Ukraine) spend advertising money for a website that is merely informational and isn't producing revenue? The answer is, they wouldn't -- and in this case they weren't. There's nothing wrong with informational website advertising, but in cases like this, at the very least, they require close scrutiny -- not a free pass with zero oversight.

Analysis of Yahoo! Internet Pharmacy Online Advertisements

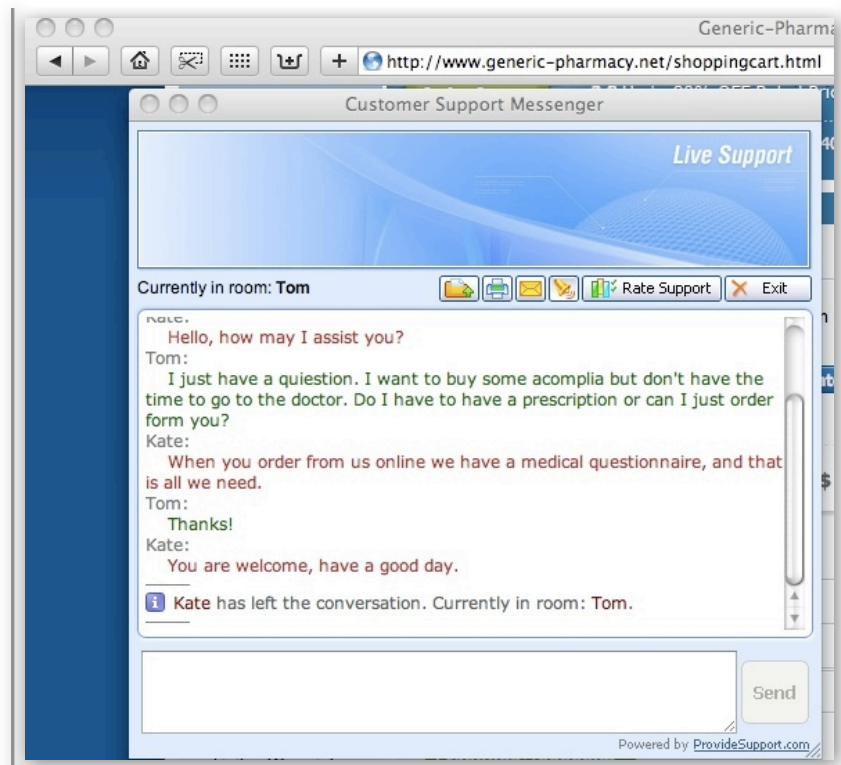
X. Rogue Yahoo! Internet pharmacy advertiser #10: generic-pharmacy.net



To wrap things up, our final example is generic-pharmacy.net: a no-prescription-required, foreign Internet pharmacy shipping drugs from India. This website is part of a foreign network called MyRxCash.com, which illegally sells drugs from India without a prescription and is headquartered in the Middle East. As noted earlier in this document, the authors did not conduct full test purchases if we were otherwise able to confirm that the website sells drugs without requiring a prescription, as we were in this case.

Below is a snapshot of our Live Chat with generic-pharmacy.net. Two things immediately stand out as illegal. First, the drug that we are asking about, Acomplia, is banned in the United States (and many other countries), because of side effects including mental disorders. Second, even if it were available, it would require a prescription (it did require a prescription when it was available in the EU market, and would have if it had been approved for use in the United States). Despite this, generic-pharmacy.net is offering to sell the drug without a valid prescription, based only on a medical questionnaire. Other prescription-only drugs are similarly available.

Generic-pharmacy.net is accurately described as a rogue Internet pharmacy, because the website ships drugs without a valid prescription from overseas into the US. Using a fictitious credit card number that we knew would be



Analysis of Yahoo! Internet Pharmacy Online Advertisements

rejected, we were able to submit an order for prescription-only drugs with generic-pharmacy.net. The order was accepted and confirmed, and only rejected when they did not receive valid payment. The only question here is how a website like generic-pharmacy.net, which blatantly violates US law and Yahoo! policy, was ever allowed to advertise in the first place.

Analysis of Yahoo! Internet Pharmacy Online Advertisements

Conclusion

Online advertising programs are at the heart of search engines' long-term business strategies. For any business that seeks to interact with potential customers online, the ability to purchase "visibility" — the display of the company's website on the "instant" (usually first) page of search results — is an integral part of reaching customers. In a sense, online advertising programs are the revenue engine that drives much of the Internet forward.

In the long term, trust is similarly at the core of successful sponsored search result programs. The ideal scenario -- both from the standpoint of Yahoo!'s commercial interest as well as the Internet users' perspective -- is if sponsored search results are more relevant, more trustworthy, and more legitimate than organic search results. It means that Internet users will be more likely, in the long term, to click on a sponsored search result, which helps Yahoo!'s bottom line. Being on the front page, it would give Yahoo!'s users better, safer and more relevant results. It would benefit advertisers as well, who would gradually see increased click-throughs and better conversions. Alternatively, if this trust breaks down, so inevitably will the search engine's online advertising program. Permitting participation by rogue advertisers may increase revenue in the short-to-medium term. In the long term, it destroys Internet users' trust and is not a sustainable business strategy.

These statements are true for all advertising, but have particular import in the area of prescription drugs. A fraudulent advertisement for bicycles or electronics may be irritating or even criminal, but usually does not carry the potential for addiction or loss of life that can result from counterfeit medicines or no-prescription-required websites selling addictive drugs. Unlike bicycles or electronics, medicines are key to our health. They can be expensive, and some Internet users -- particularly those with a genuine and possibly urgent need for safe and effective prescription drugs, but without the money to pay for them -- may be particularly susceptible to fraud or the sale of substandard drugs.

In this light, consider Yahoo!'s prescription drug and pharmacy advertisements. Prescription drugs sold without a prescription. Drugs shipped from India, Singapore, Turkey or Barbados under the pretense of a Canadian pharmacy license. A no-prescription-required website listed on the website of Yahoo!'s own Internet pharmacy verification service. Advertisements that serve only to connect users to rogue Internet pharmacy operations. None of the advertisements above were "hijacked" (meaning, redirected from legitimate ads without the knowledge of the website owner based on code surreptitiously uploaded to the website or the ad), nor only appeared for a matter of days before being caught. Indeed, despite a couple of minor exceptions, most had been observed advertising for months.

Yahoo!'s "sponsorship" of an Internet pharmacy may be seen as a stamp of approval; some Internet users will consequently assume the Internet pharmacy to be safe and legitimate. Yet the reality is far different. Just under 18% of the sponsored search results for websites selling prescription drugs that we reviewed were either legitimate, or even potentially legitimate. These

Analysis of Yahoo! Internet Pharmacy Online Advertisements

were not mere technical violations, but involved serious violation of pharmacy laws, regulations, and/or accepted standards of safety.

Moreover, we note that Yahoo! and the two other major search engines, have been informed, in writing, that they have been sponsoring rogue Internet pharmacy advertisements, by three well-respected national organizations. On July 7, 2008, the National Center on Addiction and Substance Abuse (CASA) at Columbia University wrote a letter, noting that CASA “was able to find prominent displays of ads for rogue Internet pharmacies in a search or controlled drugs...this suggests that Yahoo! is profiting from advertisements for illegal sales of controlled prescription drugs online.” On January 2, 2009, the National Association of Boards of Pharmacy (NABP) wrote to Yahoo! to inform them that “a search for prescription drugs returns some sponsored results for Internet drug outlets that do not require a valid prescription...(and)...Internet drug outlets (illegally) dispensing drugs from outside of the United States.” And on February 2, 2009, the American Pharmacists Association wrote a letter to Yahoo! to “to express (the APHA’s) concern with sponsored search results (online advertisements) for Internet drug sellers that appear to be operating in violation of law and/or accepted standards of pharmacy practice in the United States.” Yahoo! has fully been put on notice about this problem.

It is important for Yahoo! to ensure that its stated policies, and the implementation of those policies, are brought fully into compliance with the laws, regulations, and standards of safety that govern the practice of medicine and pharmacy. To that end, Yahoo! should require Internet pharmacy advertisers to adhere to standards set by the organization that represents pharmacy regulatory authorities, the National Association of Boards of Pharmacy. These approximate the same standards that govern brick-and-mortar pharmacies used throughout the US everyday. Shouldn’t American consumers be assured of the same safeguards online?

The good news is, restoring the integrity of Yahoo!’s prescription drug and health care advertising space is an achievable goal. These problems can easily be fixed through competent verification, continued monitoring, and adherence to the same standards and protections that US residents enjoy when walking into a brick-and-mortar pharmacy. However, as a systemic problem, it requires a systemic, not piecemeal, solution.

Analysis of Yahoo! Internet Pharmacy Online Advertisements

Appendix A: Overall Legitimacy of Yahoo!’s Internet Pharmacy Advertisements

Legitimate or Potentially Legitimate Internet Pharmacy Advertisers: 17.6%

Advertisers Out of Compliance with US laws: 82.4%

In conducting a review to determine the overall legitimacy of Yahoo!’s prescription drug and pharmacy advertisements, it is important to provide some context and caveats. First, there are countless possible searches for prescription drugs. The authors do not suggest that we conducted all of these searches, or that the searches we conducted provide a scientifically representative sample. Indeed, we do not have access to the full list of Yahoo!’s prescription drug and pharmacy advertisers or advertisements, so developing a list that can be defended as a statistically representative sample is challenging, if not impossible.

Before reviewing this next section, we encourage readers to return to the section, beginning on Page 6, entitled “Internet Pharmacies: What’s Legal, What’s Not”, as well as our examples on “Canadian” Internet pharmacies like CheapoDrugs.com. Some may protest that some of the Internet pharmacies classified as “not legitimate” have Canadian pharmacy licenses and are thus legitimate. The authors point out that the FDA has clearly indicated that it isn’t legal to order prescription drugs from Canadian Internet pharmacy websites. Additionally, we have already established in this report that some -- indeed, in our experience, most -- so-called “Canadian” Internet pharmacies cite a Canadian pharmacy license but, taking advantage of jurisdictional complexities, import drugs into the United States from locations like India or Turkey in ways that violate Yahoo!’s stated policy and US law, and that are not covered even by Canada’s own personal importation policy.

Methodology

Like any Internet user, we simply conducted Yahoo! searches, using fairly common search terms. These were generally the same as we used in our Microsoft report, although in some cases we slightly altered the exact wording (e.g., “generic viagra” instead of “buy viagra” or “pain meds” instead of “pain meds online”). We note that most of these searches were conducted at approximately the same time as we conducted our Microsoft searches. The legitimacy ratio of the sponsored search results may or may not be representative of all of the possible sponsored search results for prescription drugs.

As in our Microsoft report, if there was any question whatsoever about the legitimacy of an advertiser, we gave it the benefit of the doubt. Some advertisers, for example, are required to register with the DEA under the Ryan Haight Act, a new online pharmacy law. Our review suggests that they have not, but pending certain confirmation of that, we gave the website the benefit of the doubt and -- for the purposes of this calculation only -- classified it as legitimate, thus also giving Yahoo! the benefit of the doubt in these cases.

Our selection of the search terms was not completely random: the authors’ experience with Internet pharmacy crime and fraud guided, in a general sense, the types of searches we

Analysis of Yahoo! Internet Pharmacy Online Advertisements

performed. Erectile dysfunction drugs such as Viagra, Cialis and Levitra are all the subject of millions of spam emails, counterfeit drug operations, and intellectual property violations. Similarly, generic medicines are often legitimate and sold legally; but in cases where a drug remains under patent protection and no generic equivalent is authorized, the likelihood that a website offering an unapproved generic version of that drug is also engaged in other illicit activity increases dramatically. Similarly, prescription drugs with abuse potential — like Soma and tramadol — are commonly sought for purchase without a prescription.

Although we performed each search multiple times, we did **not** wait until we received a result that had an unusually high number of illicit sponsored search results as compared to the others. Indeed, the sponsored search results were largely consistent when the same keywords were used. Rather, we simply took what we found.

Inclusions and Exclusions

If, among sponsored search results, a website appeared that did not facilitate the sale of prescription drugs, that was excluded from our analysis. For example, soma250.com is an informational website returned as an advertisement Soma, but does not offer to sell the drug; soma.com leads to a lingerie website, which is obviously unrelated to our analysis, so was excluded from our calculations. Similarly, amazon.com returned as a sponsored search result for some drugs, but amazon.com does not attempt to facilitate sales of the drug. As such, these sort of search results were not included in our analysis, which analyzed the legitimacy of sponsored search results leading to websites that directly sell, or offer to facilitate the sale of, prescription drugs. Consequently, our analysis should be understood to focus on the legitimacy of “Internet pharmacy” ads -- those ads that attempt to facilitate the sale of a prescription drug -- not the legitimacy of all ads returned in response to a search for a prescription drug-related term.

Moreover, some prescription drug searches return no results that attempt to facilitate the sale of the drug. For example, a search for “Alimta,” a prescription drug used in cancer treatment, typically returns sponsored search results that merely provide information about the drug. Informational websites, and those that do not attempt to sell a prescription drug to the Internet user, were excluded from our reviews.

Results

As shown below, just under 18%, of all sponsored search results among ten searches were for either legitimate or potentially legitimate Internet pharmacies that adhere to US federal and state laws.

Yahoo! Search #1: Generic Cialis (potentially legitimate: 0/7; one result excluded)

In our search for “generic cialis,” none of the websites that actually facilitate sales of prescription drugs were legitimate Internet pharmacies. Cialis.com, an informational website, was excluded. As noted earlier in this report, drug-comparison.com sometimes directs to selfserverx.com, but sometimes to canadianmedisshop.com, a rogue Internet pharmacy affiliated with GlavMed.

Analysis of Yahoo! Internet Pharmacy Online Advertisements

generic cialis - Yahoo! Search Results

http://search.yahoo.com/search?p=generic+cialis

Web | Images | Video | Local | Shopping | more

generic cialis Search Options Customize

1 - 10 of 36,000,000 for generic cialis (About) - 0.18 s | SearchScanBETA On

SPONSOR RESULTS

Order Cialis Online - \$0.92/Pill
Buy ED Pills Online. Improve Your Sex Life, Guaranteed.
www.getcanadadrugs.com

Cialis® (Tadalafil)
Official Site.
www.CIALIS.com

Buy Cialis Online - From \$17.07
Order Today and Save. Best Prices. Cheap. Discounts. Fast Delivery.
Drug-Comparison.com/cialis

Generic Tadalafil (Cialis) Online
Save over 70% on prescriptions. **Generic 20mg, 40 tabs for \$115.**
CanadaDrugCenter.com/cialis

Buy Generic Cialis (Tadalafil)
Need generic Cialis (Tadalafil)? Buy 30 10mg pills for \$68.30 and other prescription drugs at MedStore.biz.
www.medstore.biz/prescriptions/cialis - 211k

Tadalafil - Wikipedia, the free encyclopedia
[History](#) | [Mechanism of action](#) | [Side effects](#) | [Drug interactions](#)
Tadalafil is a PDES inhibitor, currently marketed in pill form for treating erectile dysfunction (ED) under the name **Cialis**; it has recently been approved for the treatment of pulmonary arterial hypertension, and has been...
en.wikipedia.org/wiki/Cialis - 89k - [Cached](#)

Generic Cialis 20 mg - \$1.92 for a pill
Buy generic Cialis pills and other ED products online using your credit card. Fast and ... Buy Generic Nolvadex. **Cialis (Tadalafil)** is used for treating ...
www.genericcialis20mg.com - 79k - [Cached](#)

Buy Now! Generic Trial packs (Viagra & Cialis Pack) - Bestsellers ...
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www.generic-cialis.in/?product=trial+packs - [Cached](#)

Buy Now! Generic Cialis soft (Tadalafil 20mg) - Bestsellers. Generic ...
Buy Now! **Generic Cialis soft (Tadalafil 20mg)** - Bestsellers. **Generic Cialis Tadalafil Tadalafil Generic Cialis Viagra Levitra** online offshore pharmacy India Uk Canada
www.generic-cialis.in/?product=cialis+soft - [Cached](#)

"generic cialis"Health Aids Product Reviews and Prices - Epinions.com


Generic Cialis
Save up to 70% on prescriptions. **Generic 20mg, 40tabs for \$115.**
CanadaDrugPharmacy.com/cialis

Cialis - Price Match Guarantee
We will match any competitor's price. Order today - Rx required.
www.NorthWestPharmacy.com

Buy Cialis Now - Free Shipping
Compare our price for Brand and **Generic Cialis 20mg**. Free shipping.
www.planetdrugsdirect.com

Generic Cialis 20mg 10-Tablets \$59.99
Free Shipping. Licensed Canadian Pharmacy. Low Prices Guaranteed.
www.OnlineCanadaRx.com

[See your message here...](#)



Analysis of Yahoo! Internet Pharmacy Online Advertisements

Yahoo! Search #2: Generic Levitra (legitimate/potentially legitimate: 0/6)

Of the advertisements returned, we excluded two results -- WhyEnlargementPills.net and ErectileDysfunction101.net, which were largely informational websites. Of the remainder, none were legitimate. (DirectPharmacyUSA.com is an affiliate of a licensed pharmacy in Utah, but that pharmacy has shipped drugs into states where it either does not have a license or is not authorized to do so, such as Arkansas.) Best-Price lists Internet pharmacies that sell controlled substances without requiring a valid prescription.

generic levitra - Yahoo! Search Results

http://search.yahoo.com/search:_ylt=A0oGknHYV

generic levitra

1 - 10 of 46,000,000 for generic levitra (About) - 0.21 s | SearchScanBETA On

SPONSOR RESULTS

Wholesale-Priced Levitra Tablets
Buy **Levitra** at discount prices from our licensed online pharmacy.
www.CanadaDrugPharmacy.com/levitra

Levitra 20mg 20 Tabs for \$76.49
Check out our price guarantee. Order online or toll-free. Rx required.
www.NorthWestPharmacy.com

Direct Pharmacy USA - Buy Levitra
Buy **Levitra** now and get free FedEx shipping at Direct Pharmacy USA.
secure.directpharmacyusa.com

Buy Levitra Now. Free Shipping
Compare: **Generic Levitra** 20mg 10 for \$45. Free shipping.
www.planetdrugsdirect.com

Buy Generic Levitra (Vardenafil)
Want to buy **generic Levitra** (Vardenafil): 10 20mg pills for \$36.79? **Generic** and branded prescription drugs are available at MedStore.biz.
www.medstore.biz/prescriptions/levitra

generic-levitra.com - Buy Vardenafil Generic Levitra Online
Buy **levitra**. **generic-levitra.com** offers Vardenafil pills online. No prescription. Free shipping. Buy cheap **generic levitra** online.
generic-levitra.com - [Cached](#)

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Get **generic levitra**, **viagra** or **cialis** directly from this site. ... Copyright © www.generic-levitra-outlet.com. All rights reserved. ...
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Buy generic Levitra pills - \$2.40 for a pill
Buy **generic Levitra** pills and other ED products online using your credit card.Fast and discrete ...
Levitra 20 mg. Propecia 1 mg. Proscar 5 mg. We sell **Generic** ...
www.levitrapillsbuy.com/index.htm - 78k - [Cached](#)

Generic levitra - The #1 Online Pharmacy No Prescription Drugs. The ...
CLICK NOW! **Generic levitra** - FDA APPROVED. Fast delivery 1-3 days. Save your time. ... In countries USA **generic levitra** lavender is cultivated in. ...
dru.edu/doctors/online/generic-levitra.html - [Cached](#)

Generic Levitra (Vardenafil)- Erectile Dysfunction (Male Impotence ...
Generic Levitra (Vardenafil) is used to treat male sexual function problems (erection problems) ...
Generic Levitra is one of the best solution for the men ...

SPONSOR RESULTS

Buy Viagra Online - From \$16.72
Order Today and Save. Best Prices. Discounts. Fast Delivery.
Drug-Comparison.com/viagra

Better than Levitra Online
Read Our Penis Enhancement Pill Reviews Before You Purchase.
WhyEnlargementPills.net

Generic-levitra - up to 75% Less
Incredible prices. Find **generic-levitra** & save up to 75% now.
www.Best-Price.com

Erectile Dysfunction Info
Visit our guide for links and information on erectile dysfunction.
www.erectiledysfunction101.net

[See your message here...](#)

Analysis of Yahoo! Internet Pharmacy Online Advertisements

Yahoo! Search #3: Buy Tramadol (potentially legitimate: 0/8)

In our search for tramadol, LegitScript and KnujOn gave the benefit of the doubt to Exava, which does post ads for illicit Internet pharmacy sites, but directly listed only one website, HealthWarehouse.com, a likely legitimate site. TurnToHelpNow.com, an addiction recovery website, was excluded. Neither smarter.com nor ave99.com listed any relevant search results and were excluded. The remainder of the advertisers fail to meet standards approved by the National Association of Boards of Pharmacy.

The screenshot shows a Yahoo! search results page for the query "buy tramadol". The browser address bar displays "http://search.yahoo.com/search;_ylt=A0oGkIET6YJKi6Eax11XNyoA7p=buy+ RSS". The search results are organized into two columns under the heading "SPONSOR RESULTS".

Left Column Advertisements:

- Buy Tramadol Safely**: No hidden fees, FedEx Overnight, Buy Tramadol, Low Prices, Secure. www.PharmacyBuyCheap.com
- Tramadol 50mg, 90 Tabs \$83**: 180 Tabs \$113, US Licensed Pharmacy, FedEx Overnight. www.VillageMeds.com
- Lowest Online Prices - Buy Cialis Now**: Compare First and Save Your Money. Free Shipping and Discounts. Drug-Comparison.com/cialis
- Discount Canadian Pharmacy - Save Big**: We will beat any competitor's price. Order online or toll-free. www.NorthWestPharmacy.com
- Buy Tramadol at BuyTramadol.info**: Buy Tramadol Online with No Prescription and ... Buy Prescription Tramadol Online. call ... will enjoy Complete privacy , and you can buy tramadol online ... buytramadol.info - [Cached](#)
- Buy Tramadol | Cheap Pain relief for moderate to severe pain**: buy tramadol at a cheap price online. tramadol is a pain relief that treats ... buy tramadol online | online drugstore pharmacy | tramadol information ... www.buytramadol.ca - [Cached](#)
- Buy Tramadol: U.S. licensed Pharmacy: FedEx Overnight Shipping ...**: Buy Tramadol Online: U.S. Licensed Pharmacy: USA Only: FedEx Overnight Shipping On All Tramadol Orders: Fast Excellent Service buytramadol1st.com - [Cached](#)
- Buy Tramadol: U.S. Licensed Pharmacies : FREE Prescription With FedEx ...**: Buy Tramadol: A Resource For You To Buy Tramadol Online From U.S. Licensed Pharmacies And Receive A FREE Prescription With FedEx Overnight Shipping www.buysttramadol.us - [Cached](#)
- Buy Online Tramadol Today At Great Prices : Buy Tramadol**: You can buy the quantity of Tramadol you need and have it delivered overnight. ... If you want to buy Tramadol online and have any questions then please feel free ... buy-tramadol.net - [Cached](#)
- Buy Tramadol: U.S. Licensed Pharmacy: FedEx Overnight Shipping ...**: Fast Overnight Shipping On All Buy Tramadol Medication Orders ... When you Buy Tramadol it is used to relieve moderate to moderately severe pain. ... buytramadol5.info - [Cached](#)
- Buy Tramadol Now: U.S. Licensed Pharmacy Buytramadolnow.us**: Buy Tramadol Now: U.S. Licensed Pharmacy: Free Prescription From Our U.S. Licensed Physicians: FedEx Overnight Shipping: U.S. Only buytramadolnow.us - [Cached](#)
- Buy-Tramadol.ws :: Buy Tramadol From A US Company With The Lowest ...**

Right Column Advertisements:

- Buy Generic Tadalafil (Cialis)**: Save over 70% on prescriptions. We offer a price guarantee program. CanadaDrugCenter.com/cialis
- Buy Cialis Now - Free Shipping**: Compare our price for Brand and Generic Cialis 20mg. Free shipping. www.planetdrugsdirect.com
- Buy Cialis Approved Pharmacy**: Self-ServeRx 24 hour delivery. Get pills fast for great sex. www.selfserveRx.com
- Buy Tramadol**: Great Deals on Brand Name Prescription Drugs. Shop Exava and Save. www.exava.com
- Find a Doctor Near You**: Tramadol Dependence Treatment in the Privacy of a Doctor's Office. TurnToHelpNow.com
- Buy Cialis Online**: Buy name-brand Cialis online. No prior prescription needed. secure.directpharmacyusa.com
- Tramadol**: Find tramadol and Compare prices at Smarter.com. www.smarter.com
- Buy Ultram**: Compare buy ultram and other Medicine and Remedies. www.Ave99.com/Medicine-and-remedies

At the bottom right of the page, there is a link: [See your message here...](#)

Analysis of Yahoo! Internet Pharmacy Online Advertisements

Yahoo! Search #4: generic meds online (legitimate or potentially legitimate: 4/9)

AmericanRxLeader.com, TrustedUSMeds.com and DiscreetUSPharma.com are currently under review for reasons outside of the scope of this report, and we give them the benefit of the doubt. Target.com is legitimate. Smarter.com was excluded. The remainder are not legitimate.

XLPharmacy.com, in particular, is reasonably classified as a dangerous, rogue Internet pharmacy.

The screenshot shows a Yahoo! search results page for the query "generic meds online". The browser address bar shows the search URL: <http://search.yahoo.com/search?ei=UTF-8&y=Sea>. The search results are displayed in a grid format. On the left side, there are several search results, including "Generic Meds" from LegalMedsDirect.com, "Xlpharmacy Top Online Review", "Generic Meds" from Target.com, "Cheap Meds Online" from Smarter.com, "ED meds online. Generic meds. Buy now!", "Generic Meds Wholesale", "Buy Generic Medications Online with No Prior Prescription at ...", "Name Brand & Generic Tablets and Meds-Online | First-Aid-Product.com", and "Order meds online. Generic cheap meds.". On the right side, there are two columns of "SPONSOR RESULTS". The first column includes "Buy Meds Here" from AmericanRXLeader.com, "Buy Prescription Meds - Online" from TrustedUSMeds.com, "Discount Generic Medications" from jandrugs.com, "Discount Meds Online" from DiscreetUSPharma.com, "Canada Pharmacy", and "Xlpharmacy". The second column includes "See your message here...". The bottom of the page shows the browser's status bar with the URL: http://rds.yahoo.com/_ylt=A0cK00XVF1K470A6_FXNyoA/SIG=14k9...501%26rs=1%26p=buy%2bgeneric%2bmeds%2bonline%26rs=0%26fr2=rs-top.

Analysis of Yahoo! Internet Pharmacy Online Advertisements

Yahoo! Search #5: Generic Ambien (potentially legitimate: 0/4).

In our search for “Generic Ambien,” a controlled substance, on **Yahoo.com**, ten online advertisements were returned. We excluded pronto.com, shopzilla.com and weknowsleep.com, which either merely provide information, or did not list prescription drug products. Meds-Search.org facilitates the sale of controlled substances without a prescription. Price-Grabber.com also lists Internet pharmacies that sell controlled substances without a prescription. PhentermineNY.com is, in this report, not classified as legitimate for reasons currently outside of the scope of this report, but generally related to the Ryan Haight Online Pharmacy Act. CompareMedsOnline.com is a membership site that lists Internet pharmacies that operate outside the bounds of US laws.

The screenshot shows a Yahoo! search results page for the query "generic ambien". The browser address bar shows the search URL. The page features a search bar with the query and a "Search" button. Below the search bar, there are navigation links for "Web", "Images", "Video", "Local", "Shopping", and "more". The search results are displayed in a grid format. On the left side, there are several organic search results, including links to Meds-Search.org, CompareMedsOnline.com, and Wikipedia. On the right side, there are sponsored search results from Health.Shopzilla.com, WeKnowSleep.com, RightHealth.com, PriceGrabber.com, and Pronto.com. The sponsored results are prominently displayed with large blue text and include descriptions of the products and links to purchase or learn more.

generic ambien - Yahoo! Search Results

http://search.yahoo.com/search;_ylt=A0oGk0BB6YJKT3kBlsdXNyoA?p=gene RSS Google

Web | Images | Video | Local | Shopping | more

generic ambien Search Options Customize

YAHOO!

1 - 10 of 19,900,000 for generic ambien (About) - 0.27 s | SearchScan BETA On

Also try: [generic ambien cr](#), [buy generic ambien](#), [More...](#)

SPONSOR RESULTS

Generic Ambien
Use Meds-Search - Find **generic ambien**.
[Meds-Search.org](#)

Compare Brand & Generic Ambien Prices
Why pay full price when you can get it at a fraction of the cost.
[www.CompareMedsOnline.com](#)

RX Sleep Meds Overnight
RX Sleep Meds-\$134.95-US Pharmacy Low \$, Fast Shipping, Best Support.
[PhentermineNY.com/ambien](#)

Zolpidem - Wikipedia, the free encyclopedia
[Uses](#) | [Mechanism of...](#) | [New research](#) | [Tolerance...](#)
As **Ambien's** patent expired April 21, 2007, new **generic** versions were approved, ... "sanofi-aventis : Drugs and Products - CNS - Stilnox/**Ambien/Myslee**" ...
[en.wikipedia.org/wiki/Zolpidem](#) - 156k - [Cached](#)

Zolpidem - Wikipedia, the free encyclopedia
[Indications](#) | [Side effects](#) | [Tolerance...](#) | [Special...](#)
As **Ambien's** patent expired April 21, 2007, 13 new **generic** versions were approved, ... "sanofi-aventis : Drugs and Products - CNS - Stilnox/**Ambien/Myslee**" ...
[en.wikipedia.org/wiki/Ambien](#) - 168k - [Cached](#)

Zolpidem Tartrate is Generic Ambien
Read about how **AMBIEN** and its **generic** form, zolpidem tartrate, differ from **AMBIEN CR**. ... I found out that this is the ingredient used in the **generic** form of **AMBIEN**. ...
[www.ambienr.com/generic-ambien.aspx](#) - [Cached](#)

SPONSOR RESULTS

Ambien Cr 12.5 Mg Tablet
Explore 300+ Health Items. Deals on **ambien cr** 12.5 mg tablet.
[www.Health.Shopzilla.com](#)

Ambien
Read an informative Review of this Sleep Aid Product. Does it work?
[WeKnowSleep.com/ambien](#)

Melatonin To Taper Off Ambien
Relax. Take a deep breath. We have the answers you seek.
[www.RightHealth.com/dieting](#)

Buy Ambien 10mg
Shop for Prescription Drugs. Compare Prices with Tax & Shipping.
[PriceGrabber.com/prescriptiondrugs](#)

Generic for Ambien
Find **generic** for **ambien** at Great Prices.
[www.Pronto.com](#)

Analysis of Yahoo! Internet Pharmacy Online Advertisements

Yahoo! Search #6: Online Pharmacy (legitimate: 3/12)

Of the sponsored search results for “online pharmacy,” target.com is a legitimate Internet pharmacy website, and two others, americanrxleader.com and expressusdrugs.com, are given the benefit of the doubt, pending verification of compliance with the Ryan Haight Act.

The screenshot shows a web browser window with the title "online pharmacies - Yahoo! Search Results". The address bar contains "http://search.yahoo.com/search;_ylt=A0oGknuV...". The search bar on the right contains "Google". The page displays search results for "online pharmacies" (1 - 10 of 77,300,000 results). The results are organized into two columns. The left column features several sponsored results, including "Buy Online Pharmacy Online" (ExpressUSDrugs.com), "Canada Online Pharmacy" (jandrugs.com), "Buy Cheap Vicodin Online Now" (discountprescriptionmedications.com), "Discount Canadian Pharmacy - Save Big" (NorthWestPharmacy.com), and "Medicine, Vitamins, Makeup, Skin Care, Contacts, Photo | Walgreens.com" (walgreens.com). Below these are organic search results for "Online pharmacy - Wikipedia, the free encyclopedia", "drugstore.com Online Pharmacy - Prescription Drugs, Health and Beauty ...", "Online Pharmacy for Prescription Drugs - CVS Pharmacy Drug Store", and "PharmacyChecker.com: About Online Pharmacies". The right column also features sponsored results, including "Safe Mail Order Pharmacies" (BestMedValues.com), "Online Prescription Pharmacy" (Target.com), "Buy Online Pharmacy Here" (AmericanRXLeader.com), "On Line Pharmacy- Licensed Pharmacy" (CanadaMedicineShop.com), "Online Canadian Pharmacy" (CanPharm.com), "Buy Drugs From Canada - Free Shipping" (planetdrugsdirect.com), and "Buy Viagra Online - From \$16.72" (Drug-Comparison.com/viagra).

Analysis of Yahoo! Internet Pharmacy Online Advertisements

Yahoo! Search #7: Cheap Soma (legitimate/potentially legitimate: 2/5).

Among the searches for Cheap Soma, we excluded smarter.com, freedrugcard.us and righthearth.com, as well as soma250.com, which are all informational websites. (Soma.com sells lingerie and was also excluded.) One website sells contact lens, which may be “prescription” but are not prescription drugs. Of the remaining websites, access2wellness.com, while not strictly a pharmacy, does facilitate the sale of prescription drugs in a way that is legitimate. The remainder of the websites are not legitimate.

The screenshot shows a Yahoo! search results page for the query "cheap soma". The browser address bar displays "http://search.yahoo.com/search?p=cheap+soma&fr=" with a search button and a "Google" search engine icon. The page header includes navigation links for "Web", "Images", "Video", "Local", and "Shopping". The search results are organized into two columns. The left column contains organic search results, while the right column contains sponsored results. The organic results include links to various websites such as DrugWorldCanada.com, VetShopOnline.com, OnlineCanadaRx.com, GlobalDrugsDirect.com, cheapsoma.net, cheapsoma.org, cheapsomas.us, cheapsoma.biz, and hotels.com. The sponsored results include advertisements for "Cheap Prescription Drugs" from access2wellness.com, "Cheap Soma" from smarter.com, "Cheap Drug" from freedrugcard.us, "Cheap Contacts Online: 70% Off" from lens.com, "Cheap Drugs" from righthearth.com, "Soma@ Carisoprodol 250 Mg" from soma250.com, and "Soma Sleepshirts" from soma.com. The page also features a "Search Pad BETA" search bar and a "See your message here..." link.

Analysis of Yahoo! Internet Pharmacy Online Advertisements

Yahoo! Search #8: Pain Meds (3/4 legitimate or potentially legitimate).

A comparatively bright spot is a Yahoo! search for Pain Meds, where only one of four websites that sell prescription drugs violates the FDCA (legalmedsdirect.com, which sells a membership and -- when LegitScript became a member in the past -- listed websites that operate in violation of the US Food, Drug and Cosmetic Act). Drugstore.com and Target.com are legitimate Internet pharmacy websites; entirelypets.com is potentially legitimate. Most of the ads, including local.com, righthearth.com, healthserviceonline.net, symptomfind.com, ave99.com and dealtime.com do not lead to websites that sell or facilitate the sale of a prescription drug and were excluded. (The last two do list over-the-counter products; however, our inquiry is limited to prescription medicines.)

The screenshot shows a Yahoo! search results page for the query "pain meds". The browser address bar displays "http://search.yahoo.com/search?p=pain+meds&fr=yfp-t-151&toggle=1&cop=r". The search results are organized into two columns. The left column contains several organic search results, including "Pain Medicine" from Local.com, "List Of Pain Meds" from righthearth.com, "THE PAIN MEDS INFORMATION PAGE" from members.tripod.com, "Pain Meds Only-Buy From Online Pharmacies That Specialize In Legal Pain ..." from www.painmedsonly.com, "Buy ATORVASTATIN - Legal Meds Direct" from legalmedsdirect.com, "Use Narcotic Pain Meds With Caution on Yahoo! Health" from health.yahoo.com, "Treatment of Colon Cancer | Treatments for Colon Cancer | Adjuvant ..." from www.meds.com, "Home Remedies For Gum Infection" from www.grannymed.com, "Prescription/O: Canada Drugs store, Online Canadian Pharmacy, Internet ..." from www.onlincanadameds.com, and "Buy Biaxin, Order Biaxin, Cheap Biaxin, Biaxin Online at Meds-Order.com" from www.meds-order.com. The right column features sponsored advertisements for "Meds Online" (Legal Rx Meds at 85% Off & Free Shipping), "Pain Medicine" (Pain medicine Online, Shop Target.com), "Pain Medication" (Pain & Fever Relief & Get 5% Back, Free Shipping on Minimum Purchase), "Back Meds Pain" (Read Up on back meds pain), "Rimadyl Arthritis Meds For Dogs" (Rimadyl Provides 24 Hr Pain Relief For Dogs, Free Shipping Over \$100), "Chronic Pain?" (Educate yourself, Find problems with chronic pain), "Pain Meds Online" (Shop & save on health care products, Store ratings, Consumer reviews), and "Online Pain Meds" (Compare online pain meds and other Medicine and Remedies).

Analysis of Yahoo! Internet Pharmacy Online Advertisements

Yahoo! Search #9: Valtrex (legitimate: 0/4)

In our search for Valtrex, one result, manageherpes.com, an informational site about herpes, was excluded, because it does not attempt to facilitate the sale of prescription drugs. The remaining websites operate outside of the bounds of US federal and state laws.

The screenshot shows a Yahoo! search results page for the query 'valtrex'. The browser address bar displays 'http://search.yahoo.com/search;_ylt=A0oGkmdV...'. The search results are categorized into 'SPONSOR RESULTS' and 'Search Pad BETA'. The 'SPONSOR RESULTS' section includes several advertisements for Valtrex, such as 'Genital Herpes' from manageherpes.com, 'Valtrex (Valacyclovir) at Very Low Cost' from CanadaDrugPharmacy.com, and 'Valtrex 500mg 30 Tabs for \$79' from NorthWestPharmacy.com. The 'Search Pad BETA' section features an advertisement for 'Generic Valtrex' from CanDrugstore.com, offering up to 80% off on generic Valtrex. Below the sponsored results, there are several organic search results, including 'Valtrex (Valacyclovir (oral)) Information - Health Results', 'VALTREX and Genital Herpes Information - Valtrex.com', 'Herpes Zoster Virus, also known as Shingles, information on VALTREX.com', 'Valtrex (Valacyclovir Hydrochloride) Drug Information: Uses, Side ...', and 'Valaciclovir - Wikipedia, the free encyclopedia'. A small image of a Valtrex tablet is visible in the bottom right corner of the search results area.

Analysis of Yahoo! Internet Pharmacy Online Advertisements

Yahoo Search #10: Generic Viagra (potentially legitimate: 0/8)

In conducting a search for “generic viagra,” eight Yahoo! advertisements were for Internet pharmacies operating outside of the bounds of US federal and state laws and pharmacy practice, as well as Yahoo!’s own standards. The authors excluded impotenceguide.info, an informational site. NexTag.com lists Internet pharmacies that operate illegally.

The screenshot shows a Yahoo! search results page for the query "generic viagra". The browser address bar shows the search URL: http://search.yahoo.com/search;_ylt=A0oGk5esU. The search results are displayed in a list format. The top result is a sponsored advertisement for "Order Viagra Online - \$0.76/Pill" from www.getcanadiadrugs.com. Other results include "Buy Viagra Online - From \$16.72" from Drug-Comparison.com/viagra, "Sildenafil Citrate (Generic Viagra)" from www.CanadaDrugPharmacy.com/viagra, "Generic Viagra Compared" from www.impotenceguide.info, "VIAGRA (Generic Viagra)" from www.genericviagra.org, "Compare Prices on Viagra - The Lowest Here" from www.spike.com/blog/compare-prices-on/74415, "Sildenafil (Viagra) - Wikipedia" from en.wikipedia.org/wiki/Viagra, "Buy Generic Viagra, Cialis, Levitra Pills Online - Lowest Prices" from www.viagra2000.com, "Erectile Dysfunction (ED) Treatment - VIAGRA® (sildenafil citrate)" from www.viagra.com, and "Generic Viagra Medicine for ED". On the right side, there is a "SPONSOR RESULTS" section with a "Search Pad BETA" button. The sponsored results include "Order Viagra Online" from www.DirectPharmacyUSA.com, "Buy Viagra Now. Free Shipping" from www.planetdrugsdirect.com, "Generic Viagra (Sildenafil Citrate)" from CanadaDrugCenter.com/viagra, "Viagra for \$32" from www.BestMedValues.com, and "Viagra-Generic" from www.NexTag.com. A small image of a Viagra box is visible next to the Wikipedia result.