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Internet Drug Outlet Identification Program

Progress Report for State and
Federal Regulators: October 2014

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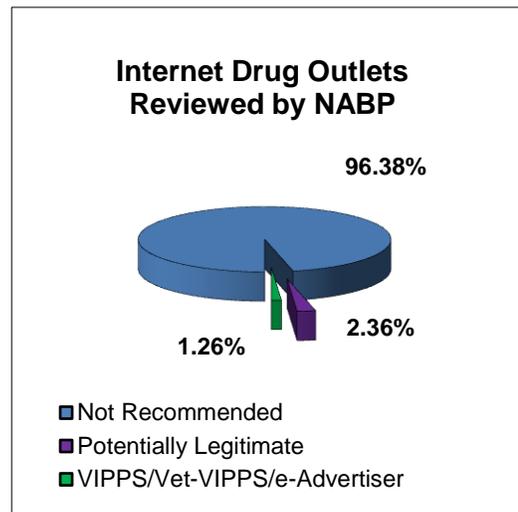
I. INTRODUCTION

Trick-or-treating for candy is one thing; trick-or-treating for medicine is quite another. Still, many individuals leave their health and safety to chance by taking medicine of unknown content from unknown sources. Those familiar with prescription drug abuse epidemic in the United States have probably heard of “Skittles parties.” In this modern-day Russian roulette, teenagers obtain various medicines from their family’s or friends’ medicine cabinets, or wherever else they can get them easily, and toss them into a bowl, concocting a candy-colorful assortment of tablets and capsules. Partygoers grab and swallow a random handful and see what happens. This is just one example of risky behaviors involving prescription medications worth mentioning during October, dubbed National Medicine Abuse Awareness Month by Community Anti-Drug Coalitions of America. Prescription drug abuse is rampant in the US. Perhaps not-so-coincidentally, so are illegal online drug sellers, many offering dangerous and addictive drugs without a prescription, contributing to the incidence of misuse and overdose. Prescription opioids, such as Vicodin[®], OxyContin[®], Percocet[®], Xanax[®], and Valium[®] top the list of drugs frequently misused for non-medical purposes. Research conducted by National Association of Boards of Pharmacy[®] (NABP[®]) in October 2014 revealed just how common it is for online drug sellers to offer these products without a prescription. In fact, three out of five search results for controlled substances online produced links to rogue sites selling addictive drugs without a prescription, as described under Current Trends, below. This exercise was completed aside from NABP’s regular ongoing research, the results of which are reported herein from April 2014 through September 2014.

II. RESULTS

A. Findings of Site Reviews to Date: As of September 30, 2014, NABP has conducted initial reviews and, via a subsequent review, verified its findings on 10,866 Internet drug outlets selling prescription medications. Of these, 10,473 (96.38%) were found to be operating out of compliance with state and federal laws and/or NABP patient safety and pharmacy practice standards. They are also listed as Not Recommended in the “Buying Medicine Online” section under Consumers on the NABP website, as well as on NABP’s AWARE[®] Prescription Drug Safety website, *www.AWAREX.ORG*. The 10,473 Internet drug outlets currently listed as Not Recommended on the NABP website are characterized in the table below.¹

Of the total 10,866 sites reviewed, 256 (2.36%) appear to be potentially legitimate, ie, meet program criteria that could be verified solely by looking at the sites and their domain name registration information. One hundred-thirty seven (1.26%) of the 10,866 reviewed sites have been accredited through NABP’s Verified Internet Pharmacy Practice Sites[®] (VIPPS[®]) or Veterinary-Verified Internet Pharmacy Practice Sites^{CM} (Vet-VIPPS[®]) programs, or approved through the NABP e-Advertiser Approval^{CM} Program.



The standards against which NABP evaluates Internet drug outlets are provided in the Appendix A of this report.

¹ These findings include the total number of websites selling prescription drugs to US patients that NABP staff has reviewed and found to be out of compliance with program standards, including those sites that were found to be noncompliant at the time of review, but may since have been deactivated. The numbers reported here do not represent the entire universe of websites selling prescription drugs illegally, but rather, a representative sampling of the online environment over the last six years.

Not Recommended Sites

Physical Location:	2,450 (23.4%) outside US
	1,535 (14.7%) inside US
	6,483 (61.9%) no location posted on website
Prescription Requirements:	9,225 (88.1%) do not require valid prescription
	6,192 (59.1%) issue prescriptions per online consultations or questionnaires only
Medications:	5,161 (49.3%) offer foreign or non-FDA-approved medications
	1,260 (12.0%) dispense controlled substances
Encryption:	1,689 (16.1%) do not have secure sites, exposing customers to financial fraud and identity theft
Server Location:	4,351 (41.5%) outside US
	5,659 (54.0%) inside US
	461 (4.4%) have unknown server locations
Affiliations:	9,541 (91.1%) appear to have affiliations with rogue networks of Internet drug outlets

Sites Listed as Not Recommended, in total, as of September 30, 2014

- B. Recommended Internet Pharmacies: NABP, along with many patient safety advocates, recommends that US patients use Internet pharmacies accredited through the VIPPS and Vet-VIPPS programs when buying medication online. These sites have undergone and successfully completed the thorough NABP accreditation process, which includes a review of all policies and procedures regarding the practice of pharmacy and dispensing of medicine over the Internet, as well as an on-site inspection of facilities used by the site to receive, review, and dispense medicine. Currently, 59 VIPPS and Vet-VIPPS pharmacy sites are listed as Recommended Internet Pharmacies. The 78 sites currently listed as Approved e-Advertisers also have been found to be safe, reliable, and lawful.
- C. Current Trends: To get a clearer picture of just how easy it is to obtain controlled substances online nowadays, NABP conducted a simple keyword search for five commonly abused prescription drugs and noted how many of the top 10 search results led to rogue Internet drug



outlets selling controlled substances that do not require a valid prescription. The five search terms were:

1. Vicodin online
2. OxyContin online
3. Percocet online
4. Xanax online
5. Valium online

Adding “online” to the search queries turned up more targeted results than the drug names alone. The search was conducted using Bing, but these results are not unique to any one search engine. A cross-check on Google and Yahoo! yielded the same or similar results. Only “organic” results (as opposed to paid ads) were counted. The search engines now successfully screen their online advertisers to block those for rogue Internet drug outlets, requiring such sites to be accredited or approved by NABP. The search engines are facing some pressure from states’ attorneys general, among others, to start screening their organic search results as well.

The search process described above found that three out of five search results for these five controlled drugs provided access to rogue Internet drug outlets selling controlled substances without a valid prescription. The top 10 search results for “Vicodin online” included six results linking to rogue sites; “Oxycontin online,” four results linking to rogue sites; “Percocet online,” seven; “Xanax online,” six; and “Valium online,” seven. That is 30 of the 50 search results.

“No. You don’t need prescription. You can buy any products that you want.”

www.Hydropharma.com

Some of the search results showed the URL for a legitimate, non-drug-related site,

Buy Vicodin Online :: OVERNIGHT Delivery!

www.active2030store.com/app.html ▼

Buy **Vicodin online** from an official certified pharmacy, No prescription is required, Exclusive & competitive discount prices, express shipping & discrete packaging.

VICODIN ONLINE - HUGE SAVINGS! UP TO 80% DISCOUNT!

www.reggae5k.com/vicodin.html ▼

Buy **VICODIN without prescription!** High quality **VICODIN online!** Order generic **VICODIN VERY CHEAP!** Free shipping worldwide! Guaranteed Delivery or your ...

but when clicked, these links resolved to another website address. For example, a search for “Vicodin online” turns up a result listing the URL for a fitness apparel retail site (www.active2030store.com/app.html), but when the user clicks this link, it resolves to a



different site (isearch4health.com) inviting users to choose from a list of various controlled substances. Selecting the Vicodin link on this page resolves to another search results page with links to sites offering Vicodin, several without a prescription, including www.hydropharmacy.com and www.rxonlineph.com. On its Frequently Asked Questions page, www.hydropharma.com states, “No. You don’t need prescription. You can buy any products that you want.” (This site offers, among other controlled drugs, hydrocodone, or “Generic Vicodin” from India.) Another result of this search lists a fishing hobbyists site (www.rippnlipps.com/about), but the link actually resolves to www.isearch4health.com, like the one above. Other search results are more straight-forward. For instance, the search for “Vicodin online” also turned up a result for www.opioids.com/offshorepharmacy, providing links to sites selling controlled substances, including www.endlessmeds.com. This site advertises, “Buy Vicodin, Buy Hydrocodone, buy codeine, buy soma, buy oxycodone, buy Vicoprofen, buy oxycontin from Mexican Pharmacies.” This site, in turn, redirects to www.confidentialshop.com, which offers Valium without a prescription.

More keyword search results for controlled substances online are provided in Appendix B of this report.

IV. DISCUSSION

- A. Controlled Substances Persist Online: While the number of rogue Internet drug outlets selling controlled substances has declined since the Ryan Haight Online Pharmacy Consumer Protection Act became effective in April 2009, there is still no shortage of addictive prescription medications readily available at the click of a mouse, without a valid prescription or medical oversight. The following six-year overview presents a broad picture of the incidence of the rogue sites selling controlled substances discovered through NABP research. The totals shown reflect the number of rogue sites added to the Not Recommended list per year. The dip from 41% of rogue sites selling controlled substances in 2008 to 8% in 2009 reflects the passage of the Ryan Haight Act. Subsequently, while less direct in their advertising of controlled substances than they once were, the illegal sellers have kept at it, as

demonstrated by the 29% of rogue sites selling controlled substances that NABP reviewed in 2013.

Year	Total Rogue Sites Reviewed	Total Rogue Sites Selling Controlled Substances	% of Rogue Sites Selling Controlled Substances
2008	1024	420	41.02
2009	3899	322	8.26
2010	2060	164	7.96
2011	1345	75	5.58
2012	1491	108	7.24
2013	362	106	29.28
Total	10181	1195	11.74

Because NABP research in 2013 targeted rogue sites thought to pose the highest risk to patient health, including those selling controlled substances, these numbers should not be assumed to represent overall trends in the online prescription drug market, but they clearly indicate an ongoing problem. While they may not be the only, or even the most common source of misused prescription drugs, the evidence is highly suggestive that illegal online drug sellers still play a role today. Remembering that Ryan Haight was a real person who, among others, died from an overdose of prescription drugs he bought online without a prescription, the evidence seems sufficient to support further outreach and education.

- B. Prescription Drug Abuse Tapers, but Only Slightly: Regardless of the source, prescription drug abuse remains prevalent, including among teens. The University of Michigan’s December 2013 *Monitoring the Future* study reports that the use of prescription narcotics has increased sharply among 12th graders in recent years, as have emergency room admissions and overdose deaths involving their use. The study, funded by the National Institute on Drug Abuse, finds that use peaked in 2004, with 9.5% of 12th graders saying they had used the drugs non-medically in the last year. This number has decreased gradually since then, to 7.1% in 2013. While some teens admitted to buying the drugs online, the majority said the drugs were given for free from a friend or relative, bought from a friend or relative, bought from a drug dealer or other stranger, or taken from a friend or relative without asking. Substance Abuse and Mental Health Services Administration’s (SAMHSA) *Results from the 2013 National Survey on Drug Use and Health: Summary of National Findings* reports that in 2013, there were approximately 6.5 million persons aged 12 or older who used prescription drugs – mostly pain relievers – non-medically. SAMHSA states that, of those who used pain relievers non-medically in the past year, only 0.1% bought them online. By contrast, Digital

Citizens Alliance claims that as of 2011, 15% of college undergraduates have, or have a friend who has ordered drugs online without a prescription.

With over half of all fatal overdoses today reportedly tied to prescription pills, trends like “Skittles parties” underscore the need for public education. “Skittle parties are a hotbed of prescription pill abuse,” the Last Resort Recovery Center reports in a May 2014 blog post on its website. “Addiction to prescription pills is simply exploding right now – it’s expanding much faster than addiction to any other class of drugs. And the most commonly abused medications are usually dangerous painkillers, such as Vicodin, OxyContin, and Percocet.” As noted in a blog post on the Decision Point Center website, “[k]ids do not seem to have a clue that playing in this type of game could very well kill them and it can do it very quickly.”

V. CONCLUSION

As multiple studies have shown, the misuse and abuse of prescription drugs is significant and problematic, and pose a serious risk to patient health. Attorney General Eric Holder, in a September 8, 2014 Department of Justice news release, calls prescription drug abuse “an ‘urgent and growing threat’ to our nation’s public health.” The factors contributing to this problem are many – patient doctor-shopping, physician over-prescribing, and drug diversion among them. Also, as NABP’s simple keyword search for controlled substances online suggests, websites selling controlled substances illegally, without medical oversight, continue to feed the problem. As the scope of the Internet grows exponentially with the launch of hundreds of new Top-Level Domains (TLDs), the online retail environment will likely become increasingly confusing. Public education is critical to dispel the notion that prescription medications used recreationally are somehow safer than illicit drugs. For its part, NABP is introducing the .pharmacy TLD to help provide clarity about prescription drug use, particularly relating to online sources. In its new role as registry operator for the .pharmacy TLD, NABP and its international partners are better positioned to educate and protect the public health against illegal online drug sellers. Having a .pharmacy domain name adds a layer of credibility to legitimate Internet pharmacies and related online resources, and has the potential to raise public awareness about the dangers posed by fake online pharmacies. The initial registration phase for .pharmacy domain names will begin in December 2014. More information about registration is available on the .pharmacy website, www.dotpharmacy.net.

NABP also plans to launch a consumer outreach campaign to spread the word about .pharmacy and medication safety. This campaign will leverage and build upon NABP’s AWARE Prescription Drug Safety Program, which continues to deliver information about medication

safety, including the dangers of prescription drug abuse and the risks associated with misbranded and counterfeit medication often sold by illegal online drug sellers. The goal is to enable patients to take medicine without taking chances.

V. APPENDICES

Appendix A

Internet Drug Outlet Identification Program Standards

1. **Pharmacy licensure.** The pharmacy must be licensed or registered in good standing to operate a pharmacy or engage in the practice of pharmacy in all required jurisdictions.
2. **DEA registration.** The pharmacy, if dispensing controlled substances, must be registered with the US Drug Enforcement Administration (DEA).
3. **Prior discipline.** The pharmacy and its pharmacist-in-charge must not have been subject to significant recent and/or repeated disciplinary sanctions.
4. **Pharmacy location.** The pharmacy must be domiciled in the United States.
5. **Validity of prescription.** The pharmacy shall dispense or offer to dispense prescription drugs only upon receipt of a valid prescription, as defined below, issued by a person authorized to prescribe under state law and, as applicable, federal law. The pharmacy must not distribute or offer to distribute prescriptions or prescription drugs solely on the basis of an online questionnaire or consultation without a preexisting patient-prescriber relationship that has included a face-to-face physical examination, except as explicitly permitted under state telemedicine laws or regulations.

Definition. A valid prescription is one issued pursuant to a legitimate patient-prescriber relationship, which requires the following to have been established: a) The patient has a legitimate medical complaint; b) A face-to-face physical examination adequate to establish the legitimacy of the medical complaint has been performed by the prescribing practitioner, or through a telemedicine practice approved by the appropriate practitioner board; and c) A logical connection exists between the medical complaint, the medical history, and the physical examination and the drug prescribed.

6. **Legal compliance.** The pharmacy must comply with all provisions of federal and state law, including but not limited to the Federal Food, Drug, and Cosmetic Act and the Federal Controlled Substances Act (including the provisions of the Ryan Haight Online Pharmacy Consumer Protection Act, upon the effective date). The pharmacy must *not* dispense or offer to dispense medications that have not been approved by the US Food and Drug Administration.
7. **Privacy.** If the pharmacy website transmits information that would be considered Protected Health Information (PHI) under the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule (45 CFR 164), the information must be transmitted in accordance with HIPAA requirements, including the use of Secure-Socket Layer or equivalent technology for the transmission of PHI, and the pharmacy must display its privacy policy that accords with the requirements of the HIPAA Privacy Rule.
8. **Patient services.** The pharmacy must provide on the website an accurate US street address of the dispensing pharmacy or corporate headquarters. The pharmacy must provide on the website an accurate, readily accessible and responsive phone number or secure mechanism via the website, allowing patients to contact or consult with a pharmacist regarding complaints or concerns or in the event of a possible adverse event involving their medication.

9. **Website transparency.** The pharmacy must not engage in practices or extend offers on its website that may deceive or defraud patients as to any material detail regarding the pharmacy, pharmacy staff, prescription drugs, or financial transactions.
10. **Domain name registration.** The domain name registration information of the pharmacy must be accurate, and the domain name registrant must have a logical nexus to the dispensing pharmacy. Absent extenuating circumstances, pharmacy websites utilizing anonymous domain name registration services will not be eligible for approval.
11. **Affiliated Websites.** The pharmacy, website, pharmacy staff, domain name registrants, and any person or entity that exercises control over, or participates in, the pharmacy business must not be affiliated with or control any other website that violates these standards.

Appendix B

Key Word Search Results for Controlled Substances Online

Search Term: “Vicodin Online”

Rogue: 6 of 10

Search Result URL	Resolved URL	Notes
www.active2030store.com/app.html	www.isearch4health.com	Typing URL from search result takes user to an apparel retail site, Active 20-30 Store, (no prescription products found). Clicking on link provided in search result: Site resolves to http://isearch4health.com, which allows users to select from a list of various controlled substances. Clicking on Vicodin resolves to a new search results page with links to sites offering Vicodin, several without a prescription; for example: hydropharmacy.com and rxonlineph.com
www.reggae5k.com/vicodin.html	www.reggae5k.com/vicodin.html	Advertises: buy vicodin online without a prescription. Links on page redirect to www.hydropharma.com, which offers controlled substances without a prescription.
www.opioids.com/offshorepharmacy	www.opioids.com/offshorepharmacy	Provides links to sites selling controlled substances. Clicking a link on www.endlessmeds.com redirects to www.confidentialshop.com, which offers Valium without a prescription.
www.rippnlipps.com/about	www.isearch4health.com	Typing URL from search results takes user to fishing hobbyists site (no prescription drugs found). Clicking on link provided in search result: Site resolves to http://isearch4health.com, which enables customers to select from a list of various controlled substances. Clicking on Vicodin resolves to a new search results page with links to sites offering Vicodin, several without a prescription, such as hydropharmacy.com and rxonlineph.com
www.northxeast.com	www.ipaplace.com	Resolves to an Internet directory of online pharmacies selling controlled substances without a prescription.
www.hydrocodoneguide.com	www.hydrocodoneguide.com	Resolves to a site that advertises hydrocodone for sale. Clicking on “buy” redirects the user to www.ezmedsbiz.com, which does not sell hydrocodone, but does sell tramadol, Valium, and Soma [®] based solely on an online consultation.

Search Term: "Oxycontin Online"

Rogue: 4 of 10

Search Result URL	Resolved URL	Notes
www.opioids.com/offshorepharmacy	www.opioids.com/offshorepharmacy	See above under Vicodin
www.endlessmeds.com/list_m1.html	www.endlessmeds.com/list_m1.html	Membership site advertising "Buy Vicodin, Hydrocodone, Codeine, Soma, Oxycodone, Vicoprofen, and Oxycontin from Mexican Pharmacies." Site provides links to Internet sites selling controlled substances without a prescription. Link to Medstore Online, which offers Xanax without a prescription.
www.netvibes.com/lookingoxycontin	www.netvibes.com/lookingoxycontin#Oxycontin	Resolves to a Google Health - Google Approved Pharmacy Directory. First site listed in directory, www.reliefpills4u.com, offers oxycodone, Oxycontin, and Percocet without a prescription.
www.reggae5k.com/oxycodone.html	www.reggae5k.com/oxycodone.html	Resolves to a site advertising "Buy Oxycodone online without a prescription." Site provides links to sites that sell controlled substances without a prescription, such as www.saferxusa.com

Search Term: "Percocet Online"

Rogue: 7 of 10

Search Result URL	Resolved URL	Notes
http://ths.gardenweb.com/forums/load/test/msg0403332410460.html	http://ths.gardenweb.com/forums/load/test/msg0403332410460.html	Site is a home and garden forum containing a page of information on Percocet. Clicking the link on this page redirects users to www.thehoturl.com , which provides search results for sites selling controlled substances without a prescription.
www.opioids.com/offshorepharmacy	www.opioids.com/offshorepharmacy	See above, under Vicodin
reggae5k.com/oxycodone.html	www.reggae5k.com/oxycodone.html	See above, under Oxycontin (This one appeared twice in top 10.)
www.buypercocets.com	www.buypercocets.com	Site advertises Percocet for sale. When clicking on Order Now, users are redirected to www.ipharmacylist.com , which offers controlled substances without a valid prescription.
www.wheretobuy medication.com	www.wheretobuy medication.com	Site sells controlled substances, such as Adderall [®] , oxycodone, Vicodin, and Percocet without a prescription. Site states shopping cart is under construction and customers must email wheretobuy medication@gmail.com to order. Site requires payment using a prepaid Visa or MasterCard.
www.percocetnorx.com	www.percocetnorx.com	Site advertises Percocet for sale. When clicking on Go To Pharmacy, users are redirected to www.ezmedsbiz.com , which offers controlled substances without a valid prescription.

Search Term: "Xanax Online"

Rogue: 6 of 10

Search Result URL	Resolved URL	Notes
www.jbchosting.com/pack.shtml	http://www.controlledpills.com/?aff_id=65994	Site resolves to <i>Controlledpills.com</i> which offers controlled substances without a valid prescription.
www.comparexanaxoffers.com	www.comparexanaxoffers.com	Site advertises controlled substances such as Valium, Ambien [®] , and Xanax. Clicking on Valium redirects users to <i>www.onlinepharmacytabs24.com</i> , which offers controlled substances without a prescription.
www.bethelnewlife.org/document/buyxanax	www.bethelnewlife.org/document/buyxanax	Site advertises controlled substances such as tramadol, Xanax, Ambien, and Valium. Clicking on "Buy Now" redirects to <i>www.pharmadiscout24.com</i> , which offers controlled substances without a valid prescription.
www.kishindaiko.com/contact	www.rxtrue.com	Site resolves to www.rxtrue.com , which offers controlled substances without a valid prescription.
www.anxietysrc2013.com	www.anxietysrc2013.com	Site is a blog about Valium. Includes an advertisement for buying Valium online. Clicking the advertisement redirects users to www.ezmedsbiz.com , which offers controlled substances without a valid prescription.
www.xanaxanxiety2013.com	http://xanaxanxiety2013.com/	Site advertises Xanax. Clicking on "Buy Now" redirects users to www.ezmedsbiz.com , which offers controlled substances without a valid prescription.

Search Term: “Valium Online”

Rogue: 7 of 10

Search Result URL	Resolved URL	Notes
www.get-diazepam.com	www.get-diazepam.com	Site advertises Valium for sale without a prescription. When clicking the pharmacy/order button, users are redirected to www.online-drugs-24h.net, which offers controlled substances without a prescription.
www.kolder.org/valium-online	www.kolder.org/valium-online	Site advertises Valium, Xanax, and Ativan® for sale. Clicking on the product resolves to www.ezmedsbiz.com, which offers controlled substances without a valid prescription.
www.constitutionalist-church.org/valiumonline	www.constitutionalist-church.org/valiumonline	Site advertises controlled substances without a prescription. When clicking on "Buy Now," site redirects users to www.pharmadiscount24.com, which offers controlled substances without a valid prescription.
www.anxietysrc2013.com	www.anxietysrc2013.com	Site is a blog about Valium. Includes an advertisement for buying Valium online. Clicking the advertisement redirects to www.ezmedsbiz.com, which offers controlled substances without a valid prescription.
www.247anxietyblog.com/category/valium	www.247anxietyblog.com/category/valium	Site is a blog about Valium. Includes an advertisement for buying Valium online. Clicking the advertisement redirects to www.rxtrue.com, where you can purchase controlled substances without a valid prescription.
www.kishindaiko.com/contact	www.rxtrue.com	Site resolves to www.rxtrue.com, which offers controlled substances without a valid prescription.
www.manateeinn.com/lib/	www.manateeinn.com/lib/	Site advertises controlled substances without a prescription. When clicking on "Buy Now," users are redirected to www.pharmadiscount24.com, which offers controlled substances without a valid prescription.

- Medstore-online.cc – Disclaimer: "... The purchaser is responsible for the correct choice and use of ordered drugs and other pharmaceutical products which are available without a prescription." (offers Alprazolam made in India)
- Reliefpills4u.com – Oxycodone, **oxycontin**: "Why are we #1 Pharmacy? ... No Doctor visit"
- Pharmaassists.com – "Pharma-Assists its [sic] an online pharmacy store which has all the solutions for chronic pain relief. Percocet oxycodone roxicodone, **Xanax** and many more chronic pain relievers. **Prescribed drugs can be ordered online without prescription** and get shipped overnight."
- Hydropharma.com – FAQ: "**No. You don't need prescription. You can buy any products that you want.**" (This site offers hydrocodone: "Generic **Vicodin**" from India)
- Wheretobuy medication.com – "Where To Buy Pain Medication and ADHD Medication without a prescription," and "Now you can buy Vicodin without a prescription for a cheap cost..." and "You can buy Generic **Percocet** online without prescription. Cheap Percocet Generic is available for people with no insurance or who do not have access to a doctor for a consultation."
- Rxonlineph.com – also offers "Generic **Vicodin**" and "Generic Hydrocodone" from India. Has same FAQ as above.
- HealthLife offers Xanax, **Valium** (among other Controlled Substances and some unapproved knock-off Erectile Dysfunction medicines): "Online Pharmacy. No Prescription."
- Get-diazepam.com – "Buy **VALIUM** Online Without Prescription"