

No Prescription Required: Bing.com Prescription Drug ads

A second look at how rogue Internet pharmacies are compromising the integrity of Microsoft's online advertising program

S U P P L E M E N T A L R E P O R T

a follow-up by **legitscript** and **knujon**

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S U P P L E M E N T A L R E P O R T¹

On August 4, 2009, co-authors LegitScript and KnujOn released a [report](#) regarding “rogue” Internet pharmacies -- websites that sell or facilitate the sale of prescription drugs in violation of federal or state laws and accepted drug safety standards -- advertising on bing.com, Microsoft’s search (or “decision”) engine. The report explained that search advertisements are an important source of revenue for search engines, and that search ads are important “virtual real estate” for online businesses by enabling them purchase highly-sought after visibility. We referenced the growing problems of prescription drug abuse and counterfeit drug sales, explained the role that search advertising plays in exacerbating or ameliorating these trends, and noted the principle that corporations should not knowingly facilitate, or profit from, activity that is criminal or dangerous, such as the sale of prescription drugs without a proper prescription, or the unlawful importation of unapproved prescription drugs.

Following our report, on August 7, 2009, Microsoft released a [statement](#) indicating that “internal editorial teams took immediate action to manually review all pharmacy-related keywords and remove any policy violators,” and that Microsoft requires online pharmacy advertisers to “adhere to US laws.”

The authors decided to see if the problem had been fixed. First, we note a positive step: the ten specific advertisers that we reviewed in-depth no longer appear, to the extent that we can determine, as bing.com online advertisements. We commend Microsoft for disabling those advertisements.

However, a few days after Microsoft’s manual review of all pharmacy-related keywords and statement that it has removed all policy violators, one of the co-authors (KnujOn) was again able to purchase prescription drugs, without having a prescription, from a Microsoft advertiser. (In addition to the legal and safety aspects, it is a violation of Microsoft’s stated policy.)

This was not a new advertiser or one that somehow slipped through the system. The specific website was not referenced in our August 4th report, which was merely intended to analyze a sampling of violative advertisers, not to provide a comprehensive list. But it was referenced in a February 9, 2009 email -- more than six months ago -- sent by one of this report’s co-authors, LegitScript, to Microsoft warning that the advertiser, and others, were selling addictive medications without a proper prescription, and that the website violates the law and Microsoft standards. There was no response to that email from Microsoft, and the rogue Internet pharmacy discussed in this short follow-up has continued to advertise, mostly uninterrupted, since then.

¹ This follow-up is not intended to provide the same level of detail as our earlier report, or to analyze a broad cross-section of bing.com ads. It is intended as a continuation of our earlier report, looking only at the question of whether Microsoft was effective in its manual review of its pharmacy advertisements.

During this period of time, the rogue Internet pharmacy's website content has not been altered or changed.

Clicking on a bing.com online advertisement, one of the co-authors, KnujOn, simply submitted a pre-filled in online form, and received a habit-forming prescription drug overnight. The purchaser never saw a doctor nor had a genuine medical need for the drug. As we explained in our full report in depth, this is neither legal nor safe,² and the advertiser in question is reasonably described as a rogue Internet pharmacy. The specific drug in question, Soma (carisoprodol), has been responsible for numerous prescription drug overdoses and even deaths.

This supplemental report is not intended to respond to each point made in Microsoft's statement, and is not intended to provide the same degree of analysis as our earlier report. But a few points bear brief discussion. Microsoft said that the "rogue advertisers (referenced in our earlier report) manipulated the system by 'hijacking' and/or misusing landing pages." That statement may imply that rogue advertisers used code to cause the redirection of landing pages from an ad displaying the URL of an Internet pharmacy that adheres to the law. That was certainly true in at least one or two cases. We do not think that it was true in most cases. That is because most ads led to the same website that they displayed, and were advertising with bing.com for fairly long periods of time. (Indeed, in some cases, those very advertisements are currently advertising on other search engines as well.) Those are not hallmarks of hijacked landing pages. They are the hallmark of an online pharmacy openly participating in an advertising program.

Consider the example given in this report -- our eleventh in-depth analysis of a rogue Internet pharmacy search advertisement on bing.com. We presume that it survived a manual review from Microsoft's employees, and that Microsoft has some basis for believing that it is a legitimate Internet pharmacy that should be allowed to display ads on bing.com.

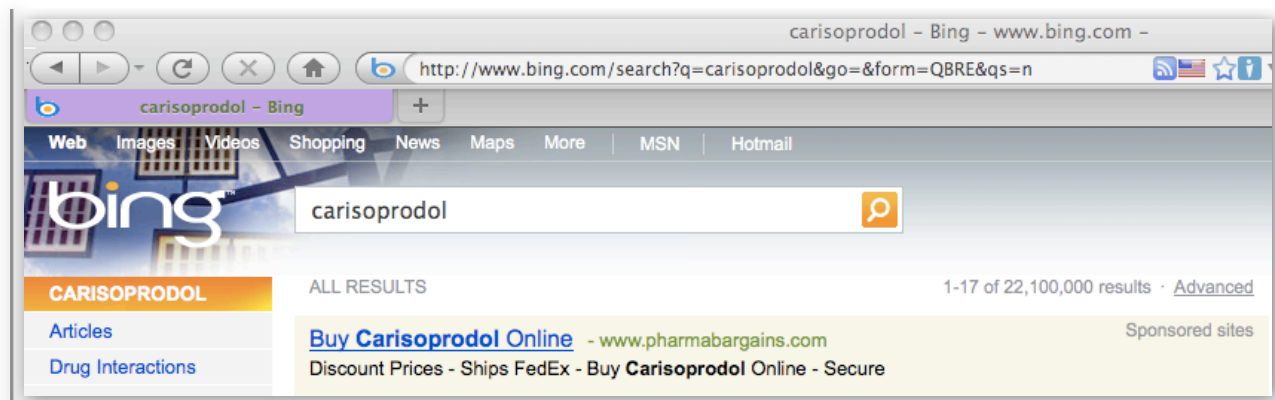
Yet this online pharmacy is far from legitimate. Via its advertisements, it sells a prescription-only drug that is a controlled substance in several states without a valid prescription.³ Selling this drug without requiring a physical examination by a licensed physician, but instead only on the basis of a pre-filled in form, violates Microsoft policy, relevant laws and regulations, and contributes to a growing problem of prescription drug abuse. If KnujOn, one of the co-authors, was able to purchase an addictive prescription medicine without a prescription from this advertiser, then it's a safe bet that others have been as well. In short, this does not suggest a problem with hijacked landing pages. It suggests a system that is not working.

Microsoft has been a leader in fighting online fraud in other areas. It can be in this area as well. We encourage Microsoft to take a serious and sustained look at how and why online pharmacies that do not comply with federal and state laws are being allowed to participate in the bing.com advertising program.

² As we explained in depth in our earlier report, prescription drugs are designated as such because, unlike over-the-counter drugs, they require medical supervision. With very rare exceptions that do not apply in this case, the requisite degree of supervision cannot exist without a prior personal examination by the prescribing physician. Simply submitting an online form, especially a pre-filled in one, is not considered to constitute a valid basis for a prescription.

³ For safety reasons, the authors use a variety of protective mechanisms when placing these orders, including fictitious details, involving in some cases locations for both payment and delivery purposes.

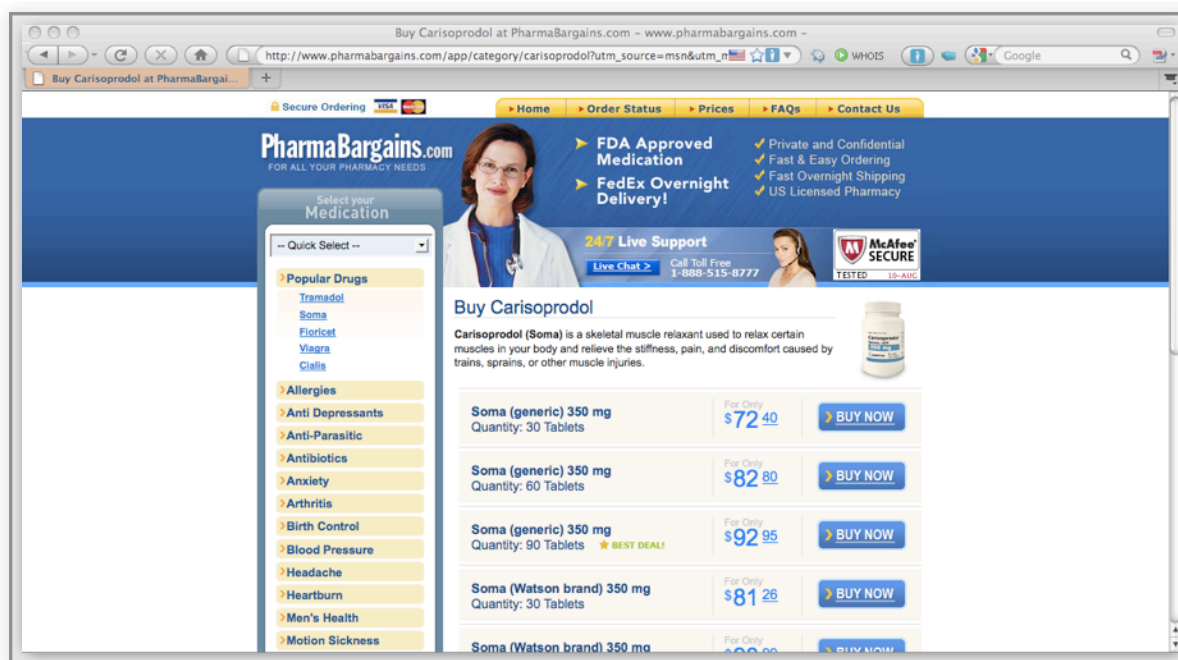
XI. Rogue Internet Pharmacy Advertiser #11: PharmaBargains.com



pharmabargains.com, a bing.com advertisement. Carisoprodol (Soma) is an addictive, habit-forming prescription-only muscle relaxant. This screenshot was captured days after Microsoft announced that it had manually reviewed its pharmaceutical advertisements.

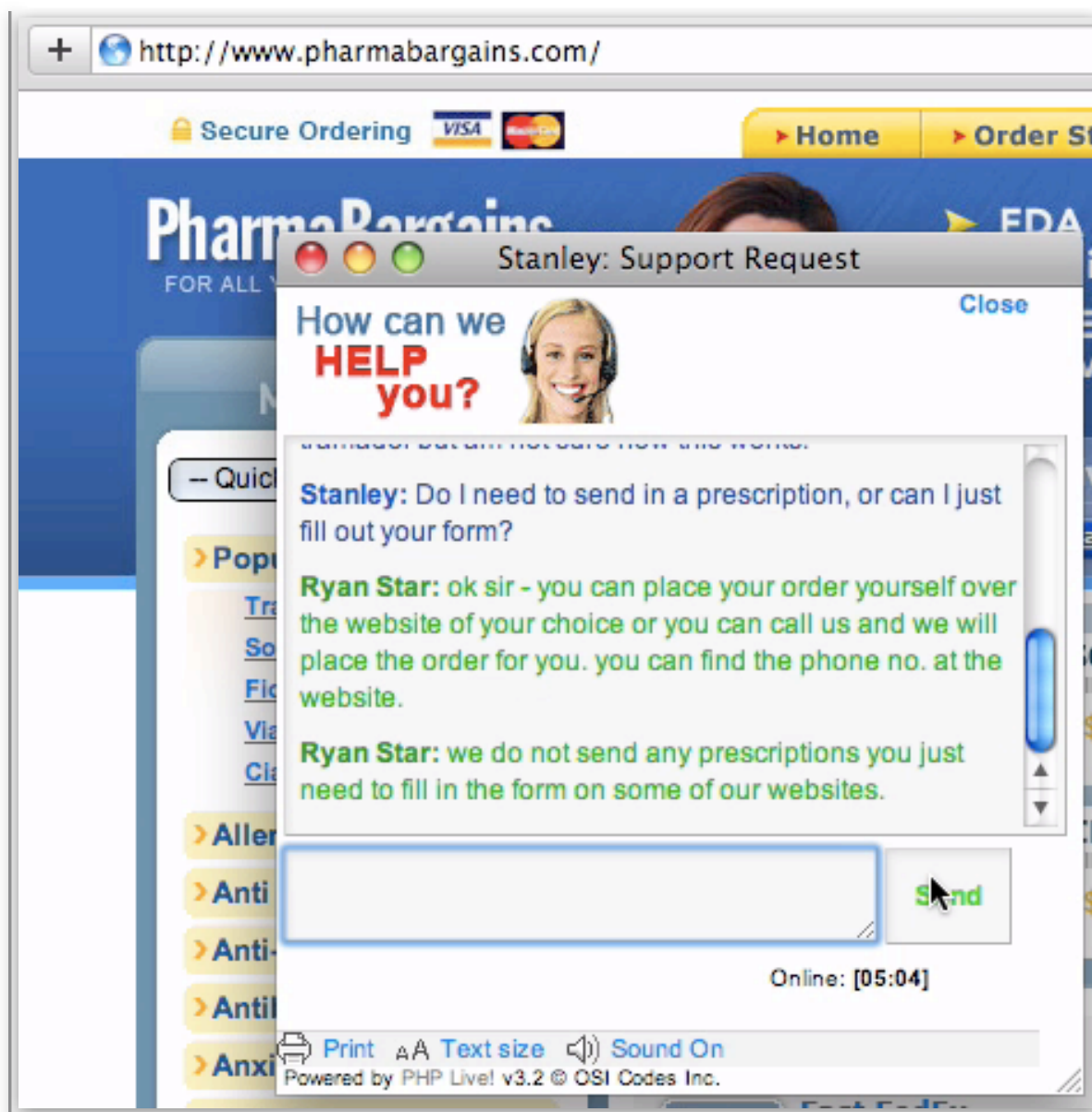
PharmaBargains.com is a bing.com advertiser for multiple prescription drugs. The advertisement has been up for months, and the snapshot above was captured several days after Microsoft announced it had removed illicit prescription drug advertisers from its system. The website is a rogue Internet pharmacy because it sells prescription drugs, including some addictive medications, without requiring a prior in-person examination by a licensed physician, but only on the basis of a pre-filled in form. (For a prescription to be valid, it must have been written by a licensed prescriber with whom the patient has a legitimate relationship, not merely an online form.)

We simply clicked on the advertisement and were immediately led, without any redirection, to the advertiser in question, pharmabargains.com.



LegitScript/KnujOn Supplemental Report on Bing.com Internet Pharmacy Advertisements

Having arrived at pharmabargains.com, we initially engaged the website's Live Chat feature, inquiring as to whether we needed to have a prescription or could simply fill out the form. Although the English was slightly convoluted, we were told that they do not "send" any prescriptions, and we just needed to fill in the order form.



Next, we chose Soma, the addictive muscle relaxant in question. We were asked to fill in our name and other details.

LegitScript/KnujOn Supplemental Report on Bing.com Internet Pharmacy Advertisements

Checkout: Form - www.pharmabargains.com

Secure Ordering [Home](#) [Order Status](#) [Prices](#) [FAQs](#) [Contact Us](#)

PharmaBargains.com
FOR ALL YOUR PHARMACY NEEDS

24/7 Live Support [Live Chat >](#) Call Toll Free 1-800-515-8777

- FDA Approved Medication
- FedEx Overnight Delivery!
- Private and Confidential
- Fast & Easy Ordering
- Fast Overnight Shipping
- US Licensed Pharmacy

Medication Request

We offer the fastest shipping you can find. Orders typically ship same day!

YOUR SELECTION

Item	Price
Soma (generic) 350 mg - 30 Tablets	\$72.40
Shipping - Fedex Next Day Delivery	\$18.00
Total	\$90.40

SECURED BY RapidSSL
McAfee SECURE TESTED 10-AUG

CUSTOMER ACCOUNT INFORMATION

Full Name: [REDACTED]
Email Address: [REDACTED]
Date of Birth: [REDACTED]
Gender: [REDACTED]
Height: [REDACTED]

The next step took us to a pre-filled out form. The image below shows part of the next page, unaltered by any response from us (indeed, no response was needed -- the appropriate answers were already filled in or checked).

Checkout: Medical Questionnaire - www.pharmabargains.com

Checkout: Medical Questionnaire

6. Please list in detail any allergies you have to medicines:
None

7. Do you permit this web site to designate the pharmacy which will fill your order?
 Yes No

8. Are you currently under treatment for any health problems?
 Yes No

9. Are you suffering from high blood pressure?
 Yes No

10. Are you currently taking any prescription or non-prescription medicines:
None

11. Please list anything in your medical history that you think might be relevant:
None

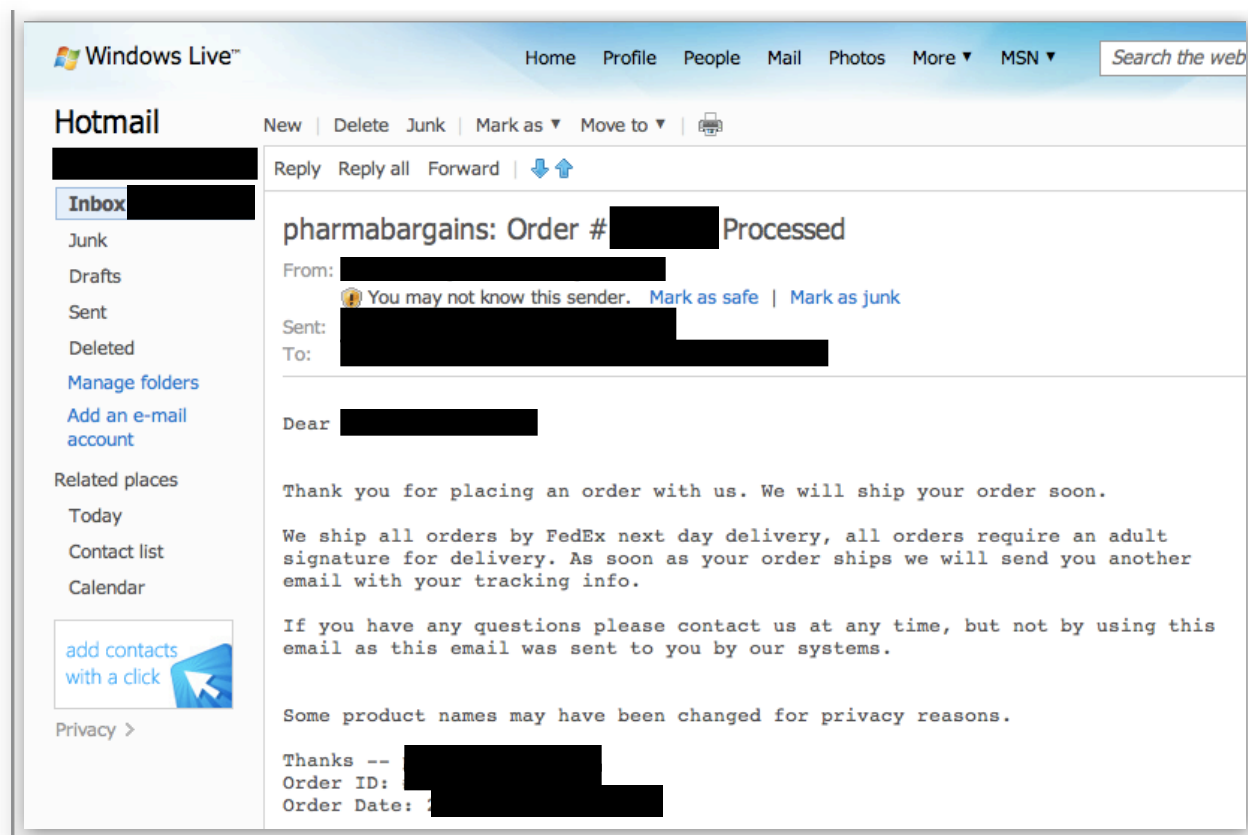
12. Please list any significant family medical history:
None

13. Are you currently pregnant or have you been nursing within the past 12 months?
 Yes No

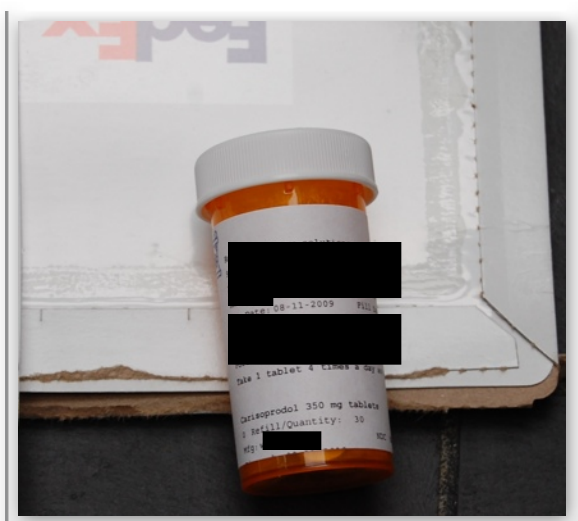
14. Will you be taking other medications while taking this medicine?

LegitScript/KnujOn Supplemental Report on Bing.com Internet Pharmacy Advertisements

We next paid for the Soma, and shortly thereafter, received an email confirmation. It is worth noting that we used a considerable amount of false information in placing the order -- yet received the drugs.



The drugs arrived shortly thereafter, and are shown below. In short, Microsoft advertiser pharmabargains.com sold us an addictive prescription drug without requiring a prior prescription. The exact drugs we received are shown below.



Conclusion

Soma (carisoprodol) is not a drug to be trifled with. It is safe and effective when used as intended, which means -- among other things -- that it is only used under the supervision of a licensed physician that has a *bona fide* relationship with the patient. The drug is abused, sometimes in combination with hydrocodone (Vicodin) or other drugs. An overdose can be fatal. There are multiple known cases involving the overdose directly stemming from the abuse of Soma, including via the Internet.

This report is not intended to point out an occasional advertiser that somehow slipped through the system for a matter of days and was subsequently caught. Consider that one of the co-authors notified Microsoft about this advertiser six months ago. It was engaged in this activity then, and still is on the date of this report. It survived Microsoft's manual review of all pharmaceutical advertisements. This isn't about an occasional abusive advertiser. It is about a system that is not working.

We understand that rogue advertisers will always seek to infiltrate online advertising programs for the simple reason that programs like Bing.com's are highly effective at targeting and reaching Internet users -- an attractive proposition to legitimate businesses and rogue ones alike. That is precisely why Microsoft, and other search engines, have an obligation to ensure that their prescription drug advertisers are legitimate, and that search advertising programs do not facilitate the problems of prescription drug abuse and the sale of counterfeit or unapproved pharmaceuticals.

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 and monitoring program in the United States, has approved over 200 legitimate Internet pharmacies, and has designated over 37,500 Internet pharmacies as "rogue Internet pharmacies." LegitScript's staff includes licensed health care providers and former law enforcement and drug policy officials.

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