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A SIMPLER TIME.

July 31, 1999, Saturday
National Desk

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Officials Struggle to Regulate On-Line Sale of Prescription Drugs

By SHERYL GAY STOLBERG

The Food and Drug Administration announced steps today to curb the illegitimate sale of **prescription drugs** over the **Internet**, while officials at another agency, the Federal Trade Commission, asked Congress to require electronic pharmacies to post detailed on-line information about their licenses and the doctors who write the prescriptions they fill.

But the officials' pronouncements, made during a Congressional hearing to examine the burgeoning electronic drug trade, revealed as much about what the Government cannot do as what it can do. While the authorities say they may be able to rein in domestic companies marketing pills on line, they acknowledge that the bulk of the business is conducted overseas.

"Ten years ago, it was hard for you to buy a foreign drug; you had to go to a foreign country," William K. Hubbard, associate commissioner for policy at the F.D.A., said in an interview. "Now the **Internet** makes it simple, and you can't do anything about these foreign sites because you don't have the reach to foreign countries."

The growth of **prescription** drug sales in cyberspace has been troubling state and Federal officials for the last year, but no one agency has the authority to regulate it. Typically, medicine is prescribed by doctors, who are licensed by state medical boards, and is dispensed by pharmacies, also licensed by the states. But the explosion in electronic commerce, coupled with demand for the impotence pill Viagra and other new "life-style **drugs**," has turned the old system on its head.

Now doctors are prescribing pills on line to patients they have never met, in states where they are not authorized to work. Pharmacies are shipping pills across state lines without the requisite licenses. Regulatory authorities have disciplined some doctors and pharmacies, but the work is slow and difficult because the ownership of Web sites is so hard to track.

At the same time, no one knows how many electronic pharmacies exist. Representative Ron Klink, the Pennsylvania Democrat who pressed for today's

hearing before the Oversight and Investigations Subcommittee of the House Commerce Committee, said that his staff had identified more than 200, but that there might be twice that many. Mr. Hubbard, of the F.D.A., said his agency would immediately begin trying to identify each site and learn where it is registered, so the authorities in those states could be alerted.

Mr. Klink, meanwhile, said he intended to introduce legislation next week along the lines of the trade commission's proposal, which would require that any Web site selling medication state its name, address and telephone number, as well as the states in which the pharmacy and its cooperating doctors are licensed. The on-line pharmacy industry is already objecting to the bill.

"All we are saying is that if you are selling a pharmaceutical product, just like your neighborhood pharmacy has to display their license, you have to display yours on your Web page," Mr. Klink said in an interview. "We are asking nothing more from the electronic commerce people than we are asking from anyone else who is in business."

But William Razzouk, chief executive of PlanetRx.com, an on-line drugstore licensed to ship medicine to all 50 states, said he preferred a voluntary system set up by the National Boards of Pharmacy, a coalition of state licensing authorities. The coalition has begun registering on-line pharmacies, and accrediting them with its seal of approval.

Organizations mentioned in this article:

Food and Drug Administration; Federal Trade Commission

Related Terms:

Drugs (Pharmaceuticals); Computers and the **Internet**; Regulation and Deregulation of Industry; Law and Legislation; International Trade and World Market

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June 27, 1999, Sunday
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VIRTUAL DRUGGISTS: A special report.; Internet Prescriptions Boom In the 'Wild West' of the Web

By SHERYL GAY STOLBERG

Dr. Leandro Pasos was 68 years old and struggling to make a living when, about a year ago, an unusual advertisement in a Seattle newspaper caught his eye. Doctors with active licenses, the ad said, could earn up to \$10,000 a month doing "fully automated on-line medical reviews."

The ad was placed by Performance **Drugs** Inc., a fledgling company that had set up shop on the **Internet** to market Viagra, the diamond-shaped blue pills that offer millions of men the hope of better sex through chemistry. The company had lined up pharmacies in Miami and Las Vegas, Nev., to ship the pills to patients. But it needed doctors to write the prescriptions.

As an orthopedic surgeon, Dr. Pasos specialized in ailments of the bones and joints, not impotence. Still, he signed up with Performance **Drugs**. For a salary of \$5,000 a month, he agreed to review questionnaires submitted electronically by prospective Viagra patients, authorizing prescriptions as he saw fit. As he later explained to investigators, "I needed a job."

Thus did Dr. Pasos join the ranks of a growing breed of physicians: cyberdoctors. His patients were strangers to him; his examinations took place in the facelessness of cyberspace. That got Dr. Pasos into trouble with the Washington Medical Quality Assurance Commission, which in May cited him for unprofessional conduct for prescribing **drugs** to people he had not physically examined, and fined him \$500.

Although Dr. Pasos declined to be interviewed, and his lawyer said no patients had been harmed, the officials who put an end to his career in on-line prescribing like to think his case will serve as a warning. Yet their efforts have barely been noticed in the flourishing electronic drug market, a new brand of commerce that is raising questions of medical ethics and law.

In cyberspace, pharmacies are shipping pills across state lines without the requisite licenses. Doctors are writing prescriptions for people they have never

met, a practice the American Medical Association says is unethical, but not illegal. And nobody -- not Congress, nor the American Medical Association, or various Federal and state agencies -- knows quite how to stop it.

"It is strictly the Wild West of drug dealing via the **Internet**," said Representative Ron Klink, Democrat of Pennsylvania, who is pressing Congress to hold hearings on the problem. Buyers, he warned, should beware: "We don't know where these **drugs** are manufactured. We don't know if the people taking them have conditions that should preclude them. We know nothing and neither does the public. No one is watching it."

The idea behind prescriptions is that certain **drugs** are dangerous enough to warrant authorization from a doctor, a "learned intermediary," in the lexicon of medicine. Typically, once the Food and Drug Administration approves a drug for sale, it is prescribed by doctors, who are licensed by state medical boards, and dispensed by pharmacies licensed by state pharmaceutical boards. But on the **Internet**, said William K. Hubbard, associate commissioner for policy at the Food and Drug Administration, "you might as well just put **drugs** on the shelf down at the drugstore and say, 'Take your pick.'"

On-line prescribing is closely tied to another recent phenomenon: the emergence of three new "life-style **drugs**," medicines meant to enhance quality of life, as opposed to curing disease. In addition to Viagra, they are Propecia, the first pill to treat baldness, and Xenical, a new diet pill. Yet other **drugs** are readily available with a cyberdoctor's consultation. Among them are Celebrex, for arthritis; Valtrex, for herpes; Claritin, for allergies, and Zyban, an anti-smoking pill.

At the same time, there is a burgeoning black market on the **Internet**, driven primarily by foreign companies selling everything from infertility pills to antidepressants without even the pretense of a doctor's orders. But beyond having Customs inspectors stop those foreign shipments at the border, there is little the authorities can do. So they are focusing on companies like Performance **Drugs**, although whether they can rein them in is a matter of opinion.

"I don't think the politicians are going to be able to do anything to us," said Bill Reeves, who runs Viapro.com, a Phoenix-based Web site that sells Viagra. He reiterated a quote he once heard: "It's kind of like trying to nail Jell-O to a wall."

Just about anyone with a credit card can buy medicine from sites like Viapro.com. For a fee that typically ranges from \$35 to \$85, patients receive an on-line medical consultation, which consists of filling out a health history questionnaire. If the doctor approves, the pills arrive in the mail, shipped either by a pharmacy or the doctor.

No one knows how much business these sites do. But Mr. Reeves and others say they have no shortage of customers, drawn by low prices, convenience and, in the case of Viagra, the promise of anonymity.

Nor, apparently, is there any shortage of doctors. "I probably have 5,000 names of doctors who want to participate," said Bill Stallknecht, co-owner of ThePillbox.com, based in San Antonio.

Patients learn who their doctors are when the medication arrives in the mail. State licensing investigators learn the same way.

The few doctors who have been disciplined include Dr. Pasos, as well as an Illinois psychiatrist who runs a holistic health center; a Wisconsin osteopathic surgeon who, according to the authorities in that state, was convicted in the military for having an improper relationship with a teen-age boy; and a Colorado doctor who supervises a cosmetic surgery clinic.

Why they do it is anybody's guess. The Colorado doctor, Benjamin T. Johnson, 32, said he thought the work was legitimate until regulators disciplined him for unprofessional conduct. "Maybe," he said, "I got caught up in the excitement of being involved in something cutting edge."

The Doctor An On-Line Career Proves to Be Brief

Leandro Pasos was not trying to be cutting edge, just hoping to earn some extra cash. A 1954 graduate of Tulane University's medical school, Dr. Pasos had practiced medicine for more than 40 years, both in this country and his native Nicaragua, when he spotted the Performance **Drugs** ad. He was working just two hours a week, documents from the Washington Medical Quality Assurance Commission show, treating patients for lower-back pain at a Seattle-area clinic.

He sent in his resume, showed up for an interview and was hired on June 16, 1998. His one-page contract made the work sound simple. "Our automated review system," said the job description, "enables the physician to review several patient charts at a glance."

The arrangement was short-lived. That summer, an investigator for the Louisiana medical licensing authority bought Viagra by mail from Performance **Drugs**, and tipped off the Washington Medical Quality Assurance Commission when the pills came with Dr. Pasos's name on the label.

About that time, an investigator for the Kansas Board of Healing Arts bought Viagra over the **Internet** from Performance **Drugs**. This bottle, too, carried Dr. Pasos's name. The board obtained a court injunction against the doctor, accusing him of practicing medicine without a license in Kansas, and called its counterpart in Washington.

Dr. Pasos's career in **Internet** prescribing came to an end on Sept. 17, said his lawyer, Robert B. Beckerman. That was the day after the commission wrote a letter to the doctor, asking him to meet with its investigators. Not long afterward, Performance Drugs went out of business, although its orders are now being handled by a new company, Lifestyle USA, which operates out of the same office, a fifth-floor suite in a building on the edge of downtown Seattle.

The investigators met Dr. Pasos on Oct. 8, in Mr. Beckerman's office. "I have never signed a **prescription** for Viagra, ever," Dr. Pasos insisted at the outset, according to a transcript of the session. Technically, that was correct. According to Dr. Pasos's contract, there was no need to, because the dispensing pharmacy kept a copy of the doctor's medical license on file. "Orders are assumed approved," the contract said, "unless otherwise notified by the physician."

Even so, Dr. Pasos said he used discretion in considering the medical questionnaires. Patients with heart conditions were rejected for Viagra because it might be dangerous. As to how he knew patients were telling the truth, he

replied: "I have to assume you are telling the truth. Even if you come to my office, you can tell me anything."

Dr. Pasos did not know much about Performance **Drugs**. He told investigators he did not know who wrote the medical questionnaire. He did not know how many requests for prescriptions the company handled. He did not know the names of the drugstores filling the prescriptions. He did not talk to pharmacists with questions. "I would refer the calls to the company," he said.

"Were you comfortable doing this kind of work?" the investigators finally asked. "Not so much," Dr. Pasos replied. "I had no choice. Without a job, I would be going on welfare."

But the job did not turn out to be as lucrative as Dr. Pasos had hoped. In the end, he said, he collected only \$2,500 from Performance **Drugs**, half a month's pay for three months of work.

The Pharmacist A Libertarian View, A Cautious Approach

If the world of the cyberdoctor is perilous, so too is that of the **Internet** pharmacist. Bill Stallknecht has managed to survive it, at least for now.

At 52, Mr. Stallknecht is a devoted Libertarian, and his political philosophy informs his views about conducting medicine in cyberspace. (Last year, he ran for Congress in Texas under the party's banner, garnering 1 percent of the vote, he said.) He is also a pharmacist, and has owned the Pill Box Pharmacy, a group of five drugstores in the San Antonio area, since 1971.

Two years ago, he took his business on line, at the behest of a brother-in-law who prepares Web sites. The idea at first was simply to advertise. The pharmacy specializes in compounding, creating special formulations of **drugs** not readily available. Among its products, in that pre-Viagra era, was an injection therapy for erectile dysfunction, a remedy Mr. Stallknecht promoted on his Web site. By the time Viagra was approved, in March 1998, he was swamped with requests for the drug. By last August, he was filling 100 to 200 electronic orders for Viagra a day. Around that time, he said, he also established another Web site, Medicalcenter.net, to recruit doctors willing to prescribe Viagra.

He views with disdain the paternalism of the medical establishment, which he says has an interest in trying to put people like him out of business. "Have you heard any patients being unhappy?" Mr. Stallknecht asks. "All the power bases say, 'We don't want them cutting into our sacred cow.'"

Today, ThePillbox.com sells four **prescription drugs**: Viagra; Propecia, the baldness pill; Xenical, the diet drug; and Claritin, the antihistamine. Each, Mr. Stallknecht maintains, is safe enough to prescribe without a physical examination, a view the Food and Drug Administration does not share.

Other drugstores also operate on line. The CVS Corporation, for instance, recently purchased Soma.com, an on-line pharmacy that does not use cyberdoctors. It verifies prescriptions with patients' doctors by telephone, and is licensed in every state it ships **drugs** to. ThePillbox.com, in contrast, is licensed only in Texas; Mr. Stallknecht's position is that when patients visit his **Internet** site, they "actually come to Texas."

And the company fills only prescriptions written by Texas doctors. Mr. Stallknecht would not say why, but if Texas doctors are writing prescriptions for a Texas pharmacy, there is less chance of running afoul of regulators in another state.

If it sounds as if Mr. Stallknecht is just one step ahead of the law, he says, he is. He keeps meticulous records of every **prescription** he fills, and comes to work every day expecting investigators to walk through the door.

"I'm under scrutiny all the time," he said. "I tickle 50 states all the time."

The Marketer Doctor and Drugstore At the Same Web Site

It does not take much to build an electronic drugstore: just a valid doctor's license, a relationship with a drug wholesaler, and an American Express card.

That, at least, has been the experience of Eric Thom, vice president of Confimed.com, an on-line pharmacy based in Seattle. Confimed was founded last July, at the height of the Viagra craze, by an obstetrician-gynecologist whom Mr. Thom described as "an entrepreneur." The company vice president agreed to describe the process, but without using the name of the founding doctor.

At Confimed, the doctor and drugstore are rolled into one; Washington, like some other states, permits doctors to dispense medicine. The doctor began, Mr. Thom said, by hiring a Web site designer. Then, Mr. Thom said, "he called his pharmaceutical representative, gave them his American Express number, ordered about 200 pills and started listing his site on some search engines."

Mr. Thom sees nothing unethical in this. Confimed, he said, is not gouging patients; its price for Viagra is \$9.50 for a 50-milligram pill and \$11 for 100 milligrams. "You would likely pay right in that range at the neighborhood drugstore," he said.

He said the Confimed site offered complete information about Viagra's side effects and about who should not take the drug. And Mr. Thom said he took great pains to design a patient questionnaire that would be more thorough than any doctor's visit, using his marketing experience to construct the questions in such a way that patients would be forced to read them. "We've taken precautions every step of the way," he said.

So far, officials in Washington State have not taken any action against Confimed, said the company's lawyer, Jeffrey R. Johnson. Kansas, which has moved aggressively against **Internet** pharmacies, has obtained a court order preventing Confimed from doing business there. Mr. Johnson said the company would seek to overturn the order in court. Both he and Mr. Thom said they believed strongly that Confimed's business is legitimate. "We are trying to be the standard of cyberconsultation," Mr. Thom said.

The Regulators Trying to Determine How to Fix a Problem

The standard of cyberconsultation, said Dr. Nancy Dickey, immediate past

president of the American Medical Association, is an oxymoron; there can be no standard, she maintains, when patient and doctor are strangers. At its convention in Chicago on Thursday, the A.M.A. voted to develop model state legislation to limit **Internet** prescribing, and urged that cyberdoctors be disciplined.

"This is not ethical," Dr. Dickey said. "It is not good quality medicine, and it would appear to be driven largely by a desire to make money."

The National Association of Boards of Pharmacy, which represents state pharmaceutical licensing authorities, goes one step further. "Any site that uses a questionnaire without a legitimate patient-physician relationship, we consider illegal," said Carmen Catizone, the board's executive director.

He explained: Pharmacies can fill only valid prescriptions. Prescriptions written by cyberdoctors, he says, are not valid. Therefore, Mr. Catizone reasons, it is illegal for druggists to fill them.

To help guide consumers, the pharmacy association recently developed its own seal of approval. Earlier this month, the group began accepting applications from **Internet** drugstores that want to carry the seal. So far, about a dozen have applied.

But Mr. Klink, the Pennsylvania Congressman, is skeptical. "That seal can be replicated and counterfeited," he said. "Are they willing to take responsibility for each and every product sold over the **Internet** that they put their seal on?"

Mr. Klink has asked the General Accounting Office to study **Internet** drug sales, and is hoping Congress will hold hearings soon. Meanwhile, Federal and state regulators are trying to determine their authority. In April, the Food and Drug Administration convened a meeting of interested agencies. "Nobody," Mr. Hubbard said, "has explicit total authority to take over this problem and solve it."

The F.D.A., which regulates drug manufacturing, has no jurisdiction over how doctors prescribe the medicines it approves. The Drug Enforcement Agency has control over the sale of narcotics. The Federal Trade Commission, which can regulate advertising, might play a role, but only if it can document deceptive or unfair trade practices.

Last August, Pfizer, the manufacturer of Viagra, filed a complaint with the commission alleging that cyberdoctors are deceiving consumers by ignoring the advice on the drug's label to physically examine patients. Richard Cleland, an F.T.C. lawyer, would not say whether an investigation was under way.

That leaves understaffed state licensing authorities, who say that Web sites are elusive targets. Cyberdoctors can be tracked only in one way: by ordering **drugs** and seeing whose name is on the **prescription**. Web sites appear and disappear overnight. And the **Internet** is hardly a medium that can be reined in one state at a time; even if every cyberdoctor in the United States were put out of business, **drugs** would still be available from Web sites overseas.

"Did you ever try, as a kid, to take the sand and make a dike to hold the ocean back?" asked Mark Stafford, the lawyer for the Kansas Board of Healing Arts who handled the civil suit against Dr. Pasos. "That's kind of what it's like."

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Drug Buying On the Web? Be Careful, Study Says

By DENISE GRADY

People who order **prescription drugs** via the **Internet** may be paying more than they would at a drugstore and taking chances with their health, researchers at the University of Pennsylvania Medical School report.

The researchers examined 46 Web sites that sold **prescription drugs** directly to the public. Their study will be published in December in the journal *Annals of Internal Medicine*, but it was released last month and made available on the **Internet** at www.acponline.org because the journal's editor thought the public should have the information right away.

Along with the article, the journal posted an editorial by officials of the Food and Drug Administration, warning of "ominous dangers posed by **Internet** drug purchases."

Most of the sites in the study, visited in February and March, required prescriptions, either from the patient's doctor or from the Web site's on-line doctors. But the on-line doctors could prescribe the requested medication after a "consultation" that amounted to nothing more than a questionnaire filled out by the patient. Nine sites, all overseas, required no **prescription** at all.

The most popular **drugs**, sold by all the sites, were the erection pill Viagra and the male baldness drug Propecia. Prozac, birth-control pills, and weight-loss and smoking-cessation **drugs** were also available.

The lead researcher, Dr. Bernard S. Bloom, said the greatest risk posed by the sites was the on-line "doctors," unidentified and of unknown credentials, who might prescribe a drug that would harm the patient.

"Who are you really talking to?" he asked. "Is it truly a physician? We don't know. None of the sites would tell you the name of the physicians, where they were, their training or qualifications or anything about the individual with whom the patient was corresponding electronically."

In addition, he said, consumers have no way of knowing whether the **drugs**

shipped to them are genuine, the right strength and free of contaminants.

Dr. Bloom said he and his fellow researcher, Ronald C. Iannacone, an undergraduate business student, were surprised at how expensive some of the **Internet drugs** were. The median price of Viagra by **Internet** was \$5.49 per pill, with a range of \$4.50 to \$28.40. The median drugstore price for Viagra in Philadelphia was \$4.50, with a range of \$4.30 to \$6.45.

People who needed prescriptions had to pay the on-line consultation fee as well: the median price was \$70, as compared to \$60 allowed for office visits in Philadelphia by Medicare and managed-care groups.

"When you add in the consultation and the shipping, you're paying a lot more for that same service than if you went to see the physician," Dr. Bloom said. Still, he said, some people might not mind the risk and expense, in exchange for convenience.

Dr. Jeffrey E. Shuren, a medical officer at the F.D.A. and an author of the editorial, said the drug agency was also concerned about on-line consultations and the possibility of unsafe or counterfeit **drugs** being shipped. He said fake Viagra, made in Thailand and India, had been sold in Britain.

"We are making undercover buys from a lot of sites," Dr. Shuren said.

He said consumers should beware of sites that offered to sell **prescription drugs** without a **prescription**, which is illegal. He also warned against sites that did not offer access to a registered pharmacist, that sold **drugs** not approved by the F.D.A. or that listed no address or phone number in the United States.

Organizations mentioned in this article:

University of Pennsylvania

Related Terms:

Drugs (Pharmaceuticals); **Internet** and World Wide Web; Prices (Fares, Fees and Rates); Consumer Protection

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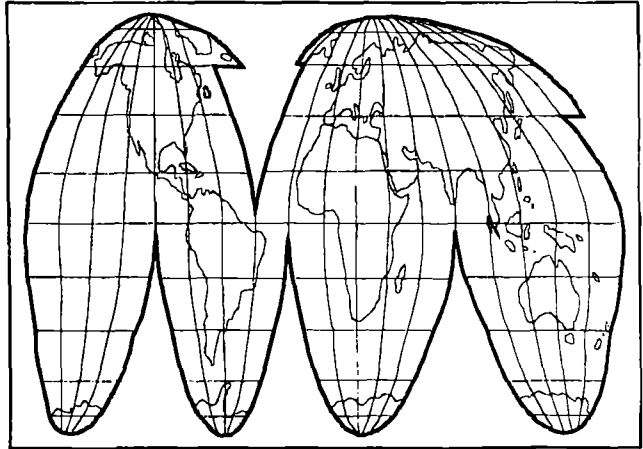
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DATE: May 12, 1999

TO: Devora Adler

FAX: 202-456-5557

FROM: Jeff Shuren

NO. OF PAGES: (Including Cover Sheet) 4

COMMENTS: I thought that I had not done a very good job last night explaining FDA's role regarding online drug sales. Therefore, I drafted the attached pages as a second, and hopefully better, attempt. Please do not hesitate to call me if there is anything I can do. I would also be happy to look over your paper before it goes to Chris.

The traditional model of health care incorporates several safeguards to protect consumers against unsafe or inappropriate use of drugs. Under this model, the consumer would first see their personal health care provider, a licensed professional, such as a physician or nurse practitioner. After taking a medical history tailor-made to the consumer's health needs and performing a physical exam, the provider would discuss treatment options with the consumer. If the provider determines that the administration of a prescription drug is appropriate, the provider would either write a prescription for the consumer to fill at a local pharmacy or through a mail order service or the provider would call in the prescription to a local pharmacy. First the provider and then a licensed pharmacist at the pharmacy, if they have records of the consumer's medications, would be able to check whether the newly prescribed drug would interact with another drug the consumer currently takes and can advise the consumer of potential side effects and contraindications. The States inspect brick-and-mortar pharmacies to ensure that they only dispense prescription drugs with a prescription, properly record and distribute controlled substances, and meet proper sanitary conditions and other quality measures.

The Internet offers individuals greater opportunities to bypass these safeguards as well as to defraud consumers. Online prescribers may not perform tailor-made histories and do not perform physical exams. As a result, they must rely more on consumer self-diagnosis which increases the likelihood that the consumer will experience a life-threatening adverse event secondary to receiving an inappropriate medication or from drug interactions. In some cases, online prescribers may not be licensed health care professionals. Some online pharmacies may not be licensed, as well. According to a survey of 200 online pharmacies conducted by the National Association of Boards of Pharmacy, 43 percent of these 200 sites were unlicensed operations. Some online pharmacies may not employ licensed pharmacists, thereby removing an important safety check for consumers. Furthermore, consumers may receive the wrong drug or may not receive the real drug. Although this risk exists for brick-and-mortar pharmacies, brick-and-mortar pharmacies have a strong incentive to play by the rules in order to protect their investment whereas fly-by-night online pharmacies looking to make a quick profit may be less concerned about their reputation.

Conceptually, we start with a product that is then promoted, prescribed, if it is a prescription drug, and then dispensed. FDA's authority extends to the product and to promotion, but generally not to prescribing and dispensing. FDA regulates products and certain activities related to those products, particularly when carried out by or on behalf of a manufacturer, packer, or distributor. Under the Federal Food, Drug, and Cosmetic (FD&C) Act, FDA can take action against illegal promotion (labeling and advertising) of a prescription drug; illegal labeling of an over-the-counter drug; the importation, sale, or distribution of an adulterated or misbranded drug; and the importation, sale, or distribution of an unapproved new drug. Put simply, FDA possesses enforcement authority over unapproved new drugs, contaminated or otherwise unsafe drugs, drugs making false or misleading claims in their labeling, and prescription drugs making false or misleading claims in their advertising. The States, however, have traditionally regulated the dispensing and prescribing of drugs as these involve the practice of medicine and the practice of pharmacy. Other aspects of Internet drug sales are subject to

enforcement activities by other Federal agencies. The FTC has responsibility for the advertising of non-prescription drugs, while the DEA regulates controlled substances. The DOJ enforces civil consumer protection statutes and criminal provisions. The U.S. Postal Service and the U.S. Customs Service enforce statutes and regulations governing the importation and domestic mailing of drugs.

The selling or dispensing of a prescription drug without a valid prescription is a violation of the FD&C Act and FDA has taken enforcement actions, in non-Internet settings, against individuals selling prescription drugs without any prescription. The States also have authority and, arguably, so may DOJ, FBI, and the Postal Service if selling prescription drugs without a prescription constitutes fraud. However, the Internet dramatically impacts the ability of any agency or body to curtail such practices. Although FDA and other agencies could bring 1, 10, 20, etc. actions, the individuals making these sales on the Internet can quickly remove their web sites and set up new ones, thereby evading enforcement actions.

The ability of federal and state agencies and bodies to enforce violations of U.S. law changes in the context of sales from abroad. Secondary to the issue of jurisdiction, federal agencies and the States cannot enforce their laws against foreign entities. Although the Customs Service can stop illegal drugs from entering the U.S., the difficulty detecting such products significantly limits the impact of enforcement efforts at the border.

Even for domestic sales, the geographic diffusion of prescribers, dispensers, and consumers, as well as other unique characteristics of the Internet present regulators with novel challenges. For example, the fact that web site operators may easily move location of their sites makes enforcement more difficult.

Additionally, as regulators consider new enforcement strategies, a careful line must be drawn between unsafe or illegal practices over the Internet and legitimate communication and commerce which is increasingly utilizing this new medium. Examples of valid prescribing and dispensing activities using the Internet are 1) the use by patients of web sites sponsored by licensed pharmacies to order refills of existing prescriptions, and 2) the use by health care providers of electronic means to transmit prescriptions to pharmacies for patients they have properly evaluated.

In crafting a policy on Internet drug sales, strong consideration should be given to providing consumers with the traditional safeguards already in place in the non-Internet arena. Appropriate safeguards would include the following: ensure that only health care providers, licensed to prescribe, prescribe drugs; require that a drug may only be prescribed after a proper evaluation by a licensed health care provider and that online prescribing without performing a physical exam does not constitute a proper evaluation; ensure that only licensed dispensers (e.g., pharmacist) sell prescription drugs; and ensure that online pharmacies meet State quality standards for pharmacies.

Consideration should also be given to electronic commerce in general. Web sites sell many products, some dangerous to use or dangerous if misused. Such products include not only drugs but also guns, alcohol, exotic animals, explosives, foods from other countries where safety standards may be low, and even people. To ensure consumer confidence in electronic commerce as well as to protect public health, consumer protection on the Internet becomes paramount. Consumer protection as regards online drug sales may be better served within the context of a broader policy on consumer protection for electronic commerce.

From a broad authority standpoint, FDA has authority over sale, importation, and distribution of misbranded (when a claim made is false or misleading, or there is information that is required but not provided, selling prescription drug without a prescription), adulterated (contaminated), or unapproved drugs. Take an action against anyone who causes the product to become misbranded, adulterated or unapproved when introduced into interstate commerce.

misbranded

Selling a drug that claims to do something it does not
Selling a drug that claims to be a brand that it is not
Selling a prescription drug without a valid prescription
Partially regulate promotion and the labeling of drugs

NO HHS authority to regulate:

Prescribing inappropriately (practice of medicine)
Dispensing (practice of pharmacy) people that claim that they are pharmacies to get drugs over the internet (state regulation)

DEA
Regulates sales of controlled substances

LEGAL CLOUDINESS

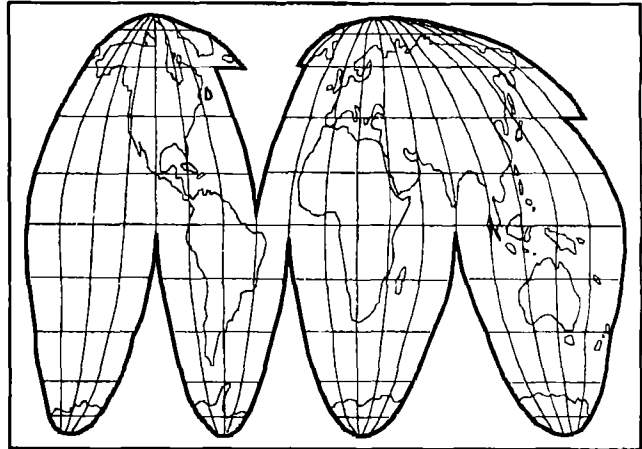
There is no definition of what a valid prescription is; the states would play a big role in any definition and it is kind of out of our purview.

What is promotion over the internet – is it labeling or advertising? Labeling FDA; advertising is FTC; FDA OGC to be consistent with off internet promotion in all other communication medium – which means that FDA can enforce – anything that explains or supplements the product

Working group?

Product	promoted	prescribed	dispensed
(all FDA)			

**Office of Policy
Food and Drug Administration
5600 Fishers Lane, HF-11
Rockville, MD 20857
Phone: (301) 827-3360
Fax: (301) 594-6777**



DATE: May 12, 1999

TO: Devora Adler

FAX: (202)456-5557

FROM: Jeff Shuren

NO. OF PAGES: (Including Cover Sheet) 8

COMMENTS: Attached is the letter to Representative Dingell regarding online drug sales.



DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration
Rockville MD 20857

MAY - 7 1999

The Honorable John D. Dingell
Ranking Minority Member
Committee on Commerce
House of Representatives
Washington, D.C. 20515

Dear Mr. Dingell:

Thank you for your letter of March 25, 1999, co-signed by Representatives Waxman, Klink and Brown, on the subject of pharmaceutical sales over the Internet. We appreciate and welcome your interest in this rapidly emerging issue, as the Food and Drug Administration (FDA or the Agency), other Federal agencies and State entities work to define and respond to the issues presented by this phenomenon. Each question in your March 25 letter is restated below (in bold type), followed by FDA's response.

- (1) What agency or department (at either the state or federal level) does FDA believe is the primary regulator of Internet pharmacies? For this question, please also identify and describe the roles of the other state/federal agencies that may make up this structure.**

We are not aware that any government agency is the "primary regulator" of Internet pharmacies. FDA does not generally regulate pharmacies. FDA regulates products and certain activities related to those products, particularly when carried out by or on behalf of a manufacturer, packer, or distributor. Under the Federal Food, Drug, and Cosmetic (FD&C) Act, FDA can take action against illegal promotion (labeling and advertising) of a prescription drug; illegal labeling of an over-the-counter drug; the importation, sale, or distribution of an adulterated or misbranded drug; the importation, sale, or distribution of an unapproved new drug; and the sale or dispensing of a prescription drug without a valid prescription. The States, however, have traditionally regulated the dispensing of drugs. Internet sites that carry out any of the above illegal acts are subject to regulatory action by FDA or the appropriate State agency.

Page 2 - The Honorable John D. Dingell

Other aspects of Internet drug sales are subject to enforcement activities by other Federal agencies. The Federal Trade Commission (FTC) has responsibility for the advertising of non-prescription drugs, while the Drug Enforcement Administration (DEA) regulates controlled substances. The Department of Justice enforces civil consumer protection statutes and criminal provisions. Finally, the U.S. Postal Service and the U.S. Customs Service enforce statutes and regulations governing the importation and domestic mailing of drugs.

In an effort to enhance interagency cooperation, FDA facilitated a meeting with a number of federal agencies and representatives of state regulatory bodies on April 26, 1999. Meeting participants discussed their roles in regulating Internet sales of drugs in an effort to advance interagency cooperation and bring clarity to issues relating to jurisdiction. Participants included the FTC, DEA, Federal Bureau of Investigation, Customs Bureau, Postal Service and State pharmacy regulators.

(2) What specific activities or functions does FDA believe it is responsible for with regard to regulating Internet pharmacies? Please describe both the precise activities now conducted by FDA, and the number of full-time equivalents (FTEs) dedicated to all identified efforts. Does FDA believe it has enough resources to conduct the activities it presently feels are under its jurisdiction in this regard? If, not, what additional resources does FDA require?

As noted in the above response, FDA does not generally regulate pharmacies. FDA regulates products and certain activities related to those products, particularly when carried out by or on behalf of a manufacturer, packer, or distributor. The States, however, have traditionally regulated the dispensing of drugs.

The Office of Compliance in FDA's Center for Drug Evaluation and Research (CDER) reviews Web sites that consumers, industry or health professionals report as appearing to be violative. CDER has taken a number of actions, such as sending Warning Letters to firms using the Internet to illegally promote the sale of unapproved new drugs and issuing Import Alerts on illegal foreign products sold on-line. FDA has also contacted Web site managers and asked for their voluntary cooperation in removing offensive sites. Warning Letters to offshore

Page 3 - The Honorable John D. Dingell

pharmacies are shared with the firm's home government, from whom we request cooperation. Additionally, CDER's Division of Drug Marketing, Advertising and Communications has taken steps against Internet promotion that violates the FD&C Act, for example, by making unsubstantiated claims for drugs or misrepresentations, or by a lack of fair balance in describing risks versus benefits.

FDA possesses limited authority over international sales and limited resources to control domestic and international sales. Clearly, oversight of the variety of public health related activities that can occur on the Internet requires the attention not only of FDA and other Federal agencies, but also State licensing and regulatory boards, the pharmaceutical industry and medical professional organizations.

The Agency is in the process of developing draft guidance for industry to provide clarification on use of the Internet for promoting regulated products.

FDA does not have any employees that are dedicated full-time to monitoring Internet sites that sell drugs or undertaking regulatory activities involving such sites. Assignments to regulatory personnel are made as information becomes available indicating that violations of the FD&C Act or FDA regulations may have occurred. Similarly, while some individuals with policy-making duties are currently spending substantial amounts of time on Internet drug sales issues, these also are not full-time assignments.

FDA has established an internal working group to explore other areas relating to Internet sales where the Agency's regulatory authority may be needed to protect the public health. Once this working group has made further progress and reported on its work, FDA then will be able to recommend to you what additional resources, if any, may be needed from Congress to address this area. We would also note that the assignment of personnel to Internet related issues may change as a result of the working group's efforts.

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- (3) Does FDA believe that existing laws and regulations, or the present state/federal regulatory structure adequately regulate online pharmacy operations? If not, what are the discrepancies, and what changes, if any, does FDA believe must be made?

As noted above, FDA's internal working group is currently exploring avenues available to the Agency under our existing authority to address Internet sales as well as additional authorities that may be needed. Once the working group makes recommendations on this matter, FDA will be able to indicate what legislative changes may be needed to provide additional authorities. We expect to gain additional perspective on this issue as we review the results of the April 26, 1999 meeting with Federal and State agencies.

Because pharmacies are generally regulated at the State level, the question of whether existing laws and regulations are sufficient to protect the public health from risks associated with Internet pharmacies should also be addressed to those State organizations responsible for the regulation of pharmacies.

- (4) Please describe FDA's knowledge regarding the differences between existing online pharmacies. For example, some reports suggest that most online pharmacies only fill prescriptions. Other reports, however, have suggested that some actually provide for a doctor consultation (for example, a quick questionnaire is submitted over the Internet, it is reviewed, and then the prescription is then approved and sent directly to the patient without a doctor ever seeing the patient). How prevalent is this latter operation? Do any trends appear in comparing one form of online pharmacy with another?

As FDA has more closely examined Internet sales of drugs over the past few months, we are struck by the diversity of Internet sites and the multi-faceted nature of the issues that are presented. Not only are questions raised about the authenticity of some pharmaceutical products sold on-line at certain Internet sites, but the legitimacy of some prescribing activity is also at issue. Because these are electronic transactions, the participants may be widely dispersed geographically and may well never meet. A consumer in one state, for instance, using a Web site emanating from a

Page 5 - The Honorable John D. Dingell

computer in another state, may order a drug dispensed from a third state, using a prescription from a doctor in a fourth state.

This geographic diffusion and other unique characteristics of the Internet present regulators with novel challenges. In the example above, if one or more participants in the transaction are located outside of the United States, the task of regulating this activity is further complicated. Similarly, the fact that Web site operators may easily move the location of their sites makes enforcement all the more difficult.

Additionally, as regulators consider new enforcement strategies, a careful line must be drawn between unsafe or illegal practices over the Internet and legitimate communication and commerce which is increasingly utilizing this new medium. Examples of valid prescribing and dispensing activities using the Internet are 1) the use by patients of Web sites sponsored by well-established pharmacies to order refills of existing prescriptions, and 2) the use by physicians of electronic means to transmit prescriptions to pharmacies for patients they have properly evaluated.

FDA's primary concern about Internet sales is based on the long-standing principle that the selection of specific drug products or treatment regimens for a particular patient should be made with the advice of a licensed physician familiar with the patient's current health status and past medical history. FDA is greatly concerned about situations where the customary physician-patient relationship does not exist. In these situations, the prescriber must largely rely on the patient to practice self-diagnosis, which multiplies the risk of negative outcomes such as harmful drug interactions, allergic reactions, contraindications, or improper dosing. We do not, however, know how prevalent this type of operation is or if there are identifiable trends as to the prevalence of one type of online pharmacy versus another. We are not aware of any reliable estimates of the number of Internet sites that sell drugs, as new sites appear on the Internet every day, just as others disappear.

(5) What is FDA's understanding of how these firms deal with issues such as medical records, privacy/protection, the selling of controlled substances, or drug interactions? How serious are these issues and what shortcomings, if any, do

Page 6 - The Honorable John D. Dingell

online pharmacies have with regard to these issues? Does FDA have any knowledge of how online pharmacies prevent unqualified persons from receiving prescriptions? Are online pharmacies more susceptible to fraud or deception? If so, please explain how?

FDA is not in a position to say whether on-line pharmacies have shortcomings in these areas. Issues pertaining to medical records and privacy protection are generally regulated by the States. In addition, the regulation of controlled substances is handled by the DEA.

While pharmacies are not required to report instances of adverse events or drug interactions, they are encouraged to submit such reports to FDA's MEDWATCH system. FDA maintains a link to MEDWATCH on our Internet site at www.fda.gov/medwatch. We take the issue of drug interactions and adverse reactions very seriously, however, we are not aware that these problems are more prevalent at pharmacies utilizing the Internet.

As to the question of how online pharmacies prevent unqualified persons from receiving prescriptions, FDA recognizes that various on-line pharmacies have different policies and procedures relating to this issue. Clearly, many on-line pharmacies do require valid prescriptions, but FDA is very concerned that some pharmacies do not. At this time, we have no information suggesting that on-line pharmacies are more susceptible to fraud or deception than other pharmacies. Susceptibility to fraud is increased at any pharmacy that takes orders without the customer physically present at the establishment or which dispenses medications through the mail rather than in person.

(6) Finally, what quality issues does FDA believe relate to the methods used to ship online pharmaceutical products, and does FDA believe it has jurisdiction in this area?

Standards enforced by FDA apply to all drugs sold in commerce in the United States, regardless of whether the order is placed in person, online or by the mail. Products that fail to meet quality standards would be adulterated or misbranded under the FD&C Act and subject to regulatory action by FDA.

Page 7 - The Honorable John D. Dingell

We very much appreciate having your thoughts and knowing of your concerns regarding the sale of drugs over the Internet. We hope this information is useful to you and we look forward to working with you and your colleagues to address this important public health issue. A similar letter is being sent to your cosigners.

Sincerely,

A handwritten signature in dark ink, appearing to read "Melinda K. Plaisier". The signature is fluid and cursive, with a long horizontal stroke at the end.

Melinda K. Plaisier
Interim Associate Commissioner
for Legislative Affairs

PRESCRIPTION DRUGS

personal importation policy exception
to law prohibiting bringing
prescription drugs into country
(not approved drugs)

reimportation limitation under
Dingell bill

misbranding

fraud? (DOJ issue) under mail fraud
or wire fraud

FDA authority is to regulate
product

~~DEA~~ for controlled substance

WHY MKT SUCCESS

- ① price
- ② pt. embarrassment
- ③ convenience
- ④ magic pill (unapproved)
- ⑤ MD says no

Buley says we found controlled
substance sites, but we
haven't.

industry wants FDA guidance on
his → promotional labeling
regulation on this other issue

FDA needs jurisdiction over
drug sales over internet
is this labeling
or advertising

enforcement mechanism wouldn't
change.

expand link in regulation

- dispensing drugs w/o prescriptions
- MPS providing drugs w/o patient
contact

WARNING BARRIER/BANNER

- list of people w/o app use of site.

distribution after buying in
bulk

FDA investigators in NY
purchasing Viagra w/o prescription.

State board of Medicine
have jurisdiction over provider

VIPS program

DQI

State Board of Pharmacy

Postal

FTC

SAQ

Customs

said
not
good
practice
of medicine

Interstate Commerce Authority

State boards & coordination.

Authority Necessary

National database bank for
prescription drug sites

Internet guidance?

NEXT STEPS

1. hearings in the fall
2. summer event
3. guidance is in draft
FDA sharing w/ FTC
4. Database
5. MBD → brief Kevin

* raise
on Tuesday
Call *

one in IL
who died
from Viagra

home
site map



visit our store
health care services
corporate info
investor info
employment
talk to us

now at your
Convenience



Pharmacy
Information

Care that touches everyone... one at a time.

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and excellent service
that you deserve.



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- patient and prescription info
- prescription center
- special events and services
- pharmacist resource center
- clinical newsletter

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health care services

visit our store | health care services | corporate information | employment

talk to us

Online Refill

Pharmacy Store Number

CVS/pharmacy #9051 Ph: 301.249-6515

RX Number **300592**

TAKE 1 CAPSULE 3 TIMES A DAY

IC AMOXICILLIN 250MG CAPSULE TEV

SMITH, BRIAN
DR. SMITH, BRIAN
MD

05/04/1999

CVS Pharmacy Store Number

Rx Numbers (up to 6) All scripts must be from above pharmacy.

1) 2) 3) 4) 5) 6)

First Name (as it appears on label)

Last Name (as it appears on label)

Jr. or Sr.

E-mail Address

Home Phone Number

 - -

Pickup Month-Day-Year-Time please allow at least 2 hours for processing prescriptions.

Comment to your pharmacist

Submit

Clear Form

[home](#) | [visit our store](#) | [health care services](#) | [corp info](#) | [investor info](#) | [employment](#) | [talk to us](#) | [site map](#)

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to German



Viagra

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Impotence Pharmacy
Viagra

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DISEASE MANAGEMENT
HOME HEALTH CARE
INFERTILITY
BREAST PROSTHESIS
INFUSION SERVICES

Mail Order Form
Contact Us
Ask Our Pharmacists
Join Our ListBot

What's New
Gallup Poll Pharmacists Ch
Company Information
What People Say About Us

Viagra now in stock for prescription delivery!
(United States, Canada, Mexico)
We can ship to other countries if we have a prescription
from an American, Canadian or Mexico doctor
We also ship penile injections and all other medications
and supplies needed to treat erectile dysfunction

Prescriptions may be faxed to:

(210) 614-3819

24 hours a day

or have your doctor call us at (800) 728-3815!

Pro-Mark is now taking prescription orders for Viagra!

[Click Here to Order](#)

Extra special web pricing! Please tell us you saw this on our web page.

Translate

to German

All strengths same low price!

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20 Tabs - \$170.95

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Plus \$1.00 shipping charge (regular mail)

[Click Here to Order](#)

(800) 728-3815

(210) 614-3819 - Fax

VIAGRA™
(sildenafil citrate)
Tablets

DESCRIPTION

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Scroll Down for Easy Order Prescription Form



800-728-3815

ProMarkRx@aol.com

Please Scroll Down to View Complete Order Form

Viagra Specials

Refill Prescription(s)

Order with this form. Simply enter the prescription refill numbers at end for form, along with the other information requested.

New Prescription(s)

Please mail the original prescription to us. If you need faster service, just send us your doctor's name, phone number (with area code), and the name of the medication you need. We will do the rest!

(800) 728-3815

Transferred Prescription(s)

Just enter in the box at the end of this form the name and phone number (with area code) of your current pharmacy along with the prescription number(s) to be refilled.

We will do the rest!

Price Quotes

(Please give drug name, strength and quantity in the box at the end of this form)

Patient Name

Your E-mail Address (Important!)

Insurance Plan or Prescription Drug Card Name

Group Number and Social Security Number

Name on Credit Card

MasterCard ☐

Name of Credit Card

Credit Card Number		
Expires (mm/yy)		
Mailing Address		
City	State	ZIP
Area Code	and Phone Number	

**Enter Prescription Refill Numbers, New Prescription Request, Transfer Request,
Non-Prescription Drug Order, Questions, Comments, or Requests for Price Quotes Below!**

Clear

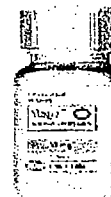
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Viagra ® has recently been approved for sexually dysfunctional or impotent men. *Express Rx* provides a *secure, confidential, and simple* way for you to be evaluated for Viagra ® use and purchase your Viagra ® prescription on-line.

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It has been estimated that up to 30 million men in the U.S. suffer from sexual dysfunction (impotence). Until recently, sexual dysfunction has been effectively treated with injections, surgery, and other procedures, many of which are painful and embarrassing. In March 1998, the FDA announced that Viagra ® a new drug from Pfizer, Inc., has been approved as treatment for male sexual dysfunction. This revolutionary treatment has been shown to help about 70% of men with impotency problems. We highly recommend you familiarize yourself with all aspects of Viagra ® at www.viagra.com. Also you may wish to read our [Viagra® Review](#).



To complete your Viagra consultation via
fax, call 1-800-586-1719

Ask for Operator "W"

It's Easy to Order!

- 1: Agree to the [Waiver of Liability](#)
- 2: Complete **online consultation form***
- 3: Provide payment and **shipping information**
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*Our physician's consultation fee is \$75. If you are approved for Viagra, you may order up to three additional Viagra refills. If you are not approved, there will be NO charge for the consultation.

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Online Consultation
and Prescription for
Viagra ®

Express Rx

Secure Order Form



You are at

STEP 2



Personal and Payment Info

Please provide the following information as completely and accurately as possible. All information must be provided to process your consultation. The following information is transmitted to us using a SSL secure connection.

Directions

- Please fill out all fields completely.
- **You will not be charged the \$75.00 Consultation fee if you are not approved.**

Name:	
Address:	
City:	
State:	
Zip Code:	
Country:	
Phone:	
Email:	

If I am approved for Viagra ®, I would like my prescription to be charged to my credit card and dispensed by ExpressRX Services. This initial prescription is good for a total of 120 Viagra ® tablets. You may order as many as you wish at this time and the balance in the future with no further consultation fee. For patients who select the 100mg dose, ExpressRX Services is offering a FREE pill splitter.

Splitting the 100mg dose can result in a cost of only \$4.95 per dose!!

I Request the following pill prescription

50 mg 	100 mg
--------------------------------------	---------------------------------------

Send my prescription as follows

- ☐ Within the U.S.A, Federal Express (overnight) \$18.00
- ☐ Outside the U.S.A., Federal Express (2-4 days) \$47.00

Attention: International Orders. By asking us to ship to another country, you are assuming all liability for any customs, duties, or tariffs. Should customs seize the shipment, we cannot refund your cost. If it is returned to us, you will be charged for shipping both ways. ☒ I

Agree

Credit Card Information

   	
Notes: • All amounts are in US currency. • If the address and zip code you listed above are the same as the address and zip code that your credit card statement is sent to, then don't enter anything for billing address and zip code. • For expiration dates in the year 2000 and above enter 00 for 2000, 01 for 2001, etc.	Name of Credit Card Holder:
	Enter Credit Card Number:
	Billing Address:
	Billing Zip Code:
	Expiration (MM/YY):

By submitting this consultation form

	Agree
I certify that I am 18 years of age or older.	☐
I am permitted by law to receive these products in my region/country/locale .	☐
I understand the side-effects of this drug.	☐
I do not have a current prescription for Viagra® from another physician.	☐
I certify that I am allowed by law to use the credit card I have selected below.	☐
I understand that my credit card will be billed for this consultation and that if I choose to have Viagra ®	☐

dispensed from ExpressRx., this too will be billed to my account if my consultation is approved.

I certify that I will answer all the questions truthfully. ☐

Medical History

STEP 3

Your Medical History informs us of any possible medical contraindications you may have to taking Viagra®. This information would be required before any physician could treat you for any illness or condition.

What is your height (in inches)? Sex? ☒ male ☐ female

What is your current weight (in lbs)? What is your month and (MM/YY) year of birth?

Are you taking any of the following?

☐ Nitroglycerin	☐ Nitrek (transdermal)	☐ Nitro-Bid®
☐ Nitrodisc	☐ Nitro-Dur®	☐ Nitrogard™
☐ Nitroglyn	☐ Nitrlingual Spray®	☐ Nitrol® Ointment (Apoll-Kit)®
☐ Nitrong	☐ Nitro-Par	☐ Nitrostar®
☐ Nitro-Time	☐ Transderm-Nitro®	☐ Isosorbide Mononitrate
☐ Imdur®	☐ Ismo®	☐ Monoket®
☐ Isosorbide Dinitrate	☐ Dilarate®-SR	☐ Isordil®
☐ Sorbitrate®	☐ Erytharyl Tetranitrate	☐ Pentaerythritol Tetranitrate
☐ Sodium Nitroprusside	☐ Deponit® Transdermal	

Do you have any of the following medical problems?

☐ Coronary Artery Disease	☐ Congestive Heart Failure	☐ Valvular Heart Disease
☐ Anatomic Deformation of the Penis	☐ Peyronie's Disease	☐ Multiple Myeloma
☐ Obesity	☐ Hypertension	☐ Diabetes Mellitus
☐ Prostate Cancer	☐ Enlarged Prostate	☐ Low Testosterone
☐ Thyroid Disease	☐ Atherosclerosis	☐ Liver Disease

☐ Kidney Disease	☐ Stroke	☐ Depression
☐ Anxiety	☐ Schizophrenia	☐ Spinal Cord Injury
☐ Endocrine Disorders	☐ Sickle Cell Anemia	☐ Leukemia

Have you had a complete physical exam with blood tests within the last year?	☐ yes ☐ no
Do you consume more than 2 servings a day of alcohol?	☐ yes ☐ no
Do you smoke cigars or cigarettes?	☐ yes ☐ no

List current medications and any medical problems.

	Up Down
--	--

Are you unable to achieve and sustain an erection that is adequate for penetration until orgasm? ☐ yes ☐ no

Have you ever been evaluated for erectile dysfunction? ☐ yes ☐ no

I feel that I am incapable of having normal satisfying sex without prescription medication. ☐ true ☐ false

Where did you hear about us?

	Up Down
--	--

Please Specify Which Newspaper

--

Please only click the Complete Consultation Button **ONCE**.
It may take a moment to check your information.

Complete Consultation	Exit
--	-------------------------------------

If you have any questions, please call
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This Month's Special

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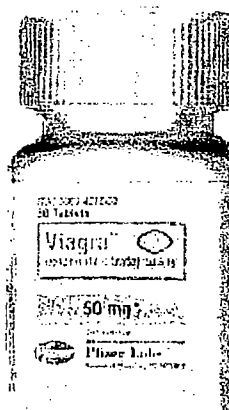
site by 123
SolveIt

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Translate to German

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(90 pills, or less)

Viagra is available only by prescription. If you would like an Online Consultation with a licensed physician to obtain a Viagra Prescription, if appropriate to your medical condition and history, [CLICK HERE](#) to go to www.MedicalCenter.net. If approved for a Viagra prescription, MedicalCenter.net will send us your prescription so that we can ship your Viagra directly to you.



Need an Online Prescription?
[click here for MedicalCenter.Net](#)

Frequently Asked Questions about Viagra:

What is Viagra?

Viagra, is a new drug from Pfizer for use in the treatment of male impotency. It is the first oral treatment for male impotence filed with the U.S. Food & Drug Administration and the European Medicines Evaluation Agency. It was approved by the FDA, 3/27/98.

Is there Prescribing Information I can read?

Yes, full prescribing information has now been published. Visit <http://www.viagra.com> for full details.

How does Viagra work?

Viagra is taken orally and is known as a phosphodiesterase 5 (PDE5) inhibitor. By inhibiting the PDE5 enzyme, which is found mainly in the penis, Viagra allows the chemical produced during sexual stimulation, cyclic GMP, to persist. The longer cyclic GMP persists, the better chance for increased blood flow and thereby, an erection.



Consultation Form for Patients requesting Viagra prescription.

Approved Viagra prescriptions are valid for your original order and will also be refillable TWO (2) additional times without a further consultation fee.

IMPORTANT: If you have ordered from us before **AND** you have **REFILLS** remaining on your prescription, [CLICK HERE](#) to order from the refill page.

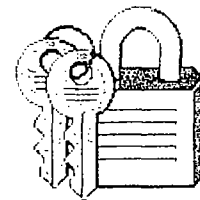
If this is your first visit, or if your refills have been used up, please continue on this page to request an online consultation for a physician to prescribe Viagra. There will be an \$85.00 charge for this physician consultation only if the doctor determines that Viagra IS appropriate for your condition. There will be **NO CHARGE** if the doctor determines that Viagra IS NOT appropriate for your condition.

There are 3 steps to this process:

- Step 1. Agree to the Waiver of Liability below.
- Step 2. Select quantity of Viagra.
- Step 3. Answer the medical questionnaire.

*If approved for a Viagra prescription, we will have your Viagra shipped to you by
The Pill Box Pharmacy.*

The medical information you provide will be **Encrypted, (via secure server) Secure, Confidential, and subject to all patient/doctor privilege laws.**



Or, if your browser has trouble with the secure server, you may [CLICK HERE](#) for a consultation form you can print and fax back.

STEP 1: Waiver of Liability.

I hereby release S & H Drug Mart, Inc. DBA The Pill Box Pharmacy and DBA MedicalCenter.net and all of their employees and contractors including physicians from any and all liability whatsoever associated or connected with my Viagra Consultation and/or my use of Viagra. I hereby state that I am an adult and that I am aware of the potential side effects associated with Viagra as listed by Pfizer at: <http://www.viagra.com/>. I understand that falsifying information in order to obtain prescription medication is a violation of both State and Federal U.S. law. I hereby agree to answer truthfully all of the medical questions on my questionnaire.

I understand that no doctor, nurse, or administrative personnel can guarantee that Viagra, even if prescribed, will provide the results I seek. Further, I understand that even if prescribed, I may suffer adverse effects from Viagra. I hereby release MedicalCenter.net and all of its employees and contractors including physicians from any and all liability whatsoever associated with any

adverse effects I may suffer from my use of Viagra. I also fully understand that if I have failed in any way to furnish MedicalCenter.net with my complete and accurate medical history, or become aware of any changes in the future of which I have not notified MedicalCenter.net then I cannot hold MedicalCenter.net responsible for any adverse effects I may suffer.

I am submitting this questionnaire at my own choice, at my own expense, and my own liability and assume all responsibility for my use of Viagra. I fully understand that it is my responsibility to have an annual physical examination, including any suggested laboratory tests, to ensure that I have no disease which might make Viagra inappropriate for my condition. I further agree that I have consulted with my present physician and/or pharmacist and hereby warrant that I am not taking any medications or combination of medications that are on the published list of medications which would make Viagra contraindicated. [CLICK HERE](#) to read this list. I further agree to immediately notify any doctor whose present care I am under that I have chosen to take Viagra so that they may advise to continue or discontinue use. Should I engage a new doctor's care in the future, I further agree to immediately notify said doctor of my use of Viagra.

I further agree that I have read the MedicalCenter.net patient education page on Viagra and erectile dysfunction. [CLICK HERE](#) to read this patient education page. It is important that you understand that while Viagra may control your erectile dysfunction it does not treat possible underlying causes of your erectile dysfunction, such as diabetes, etc. Reading this page is an important part of this consultation.

If after review of my questionnaire, a doctor determines that Viagra is the appropriate treatment for my condition, I hereby authorize a charge of \$85.00 to be charged to my credit card for this Doctor Consultation and understand that this charge is in addition to the cost of the medication (Viagra).

*In order to continue - you must agree
to the Waiver of Liability above.
Please Click Either:*

NO, I DO NOT AGREE

or:

YES, I AGREE

*If you agree, you will taken
to a secure server for your consultation.*

*Or, if you prefer, you may [CLICK HERE](#) for a form
you can print and fax back.*

[Home](#) [Viagra](#) [Propecia](#) [Claritin](#) [Links](#) [Contact Us](#)

MedicalCenter.net is an Internet marketing and administrative agency owned by [The Pill Box Pharmacy](#). Our goal is help you find products, services, and information you desire from our compiled list of international resources, including clinics, physicians, and pharmacies. [CLICK HERE](#) to join our resource list.

site by 123SolveIt
may we build one for you?

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MedicalCenter.net

PRINT, ANSWER ALL QUESTIONS and FAX back to: 210.509.6438

Full Name: _____

Street Address: _____

State/Prov: _____ Country _____ Zip/PC: _____

Phone: _____ Fax: _____ E-mail: _____

Date of Birth: _____ Sex: MALE FEMALE (circle one)

Height _____ Weight: _____

Known Allergies: _____

Conditions for which you are currently receiving treatment: _____

Current Medications: (Please list all medications you are taking, even occasionally) _____

Do you take any medication classified as a nitrate in any form?

YES NO (circle one)

Do you have a problem achieving and/or maintaining an erection sufficient for sexual intercourse?

YES NO (circle one)

Have you suffered a myocardial infarction, stroke, or life-threatening arrhythmia within the last two years? Do you have resting hypotension (BP<90/50/) or hypertension (BP>170/100)?

Do you have cardiac failure or coronary artery disease causing unstable angina?

Do you have retinitis pigmentosa?

YES to one or more. NO to all. (circle one)

How did you hear about us? _____

Credit Card: **VISA MASTERCARD AMEX DISCOVER (circle one)**

Name on Card: (if different than above): _____

Cardholder Address: (if different than above) _____

Credit Card Number: _____ Exp Date: _____

Shipping Address: (if different than above) _____

I would like a prescription for Viagra:

Circle Strength requested or Rx will be for 50mg.

25mg 50mg 100mg

____ 10 Tablets \$105.09 | Make Checkmark
____ 20 Tablets \$204.69 | next to number
____ 30 Tablets \$304.39 | of Tablets requested.

I certify that I have answered all questions truthfully and that I have read and agree to the Waiver of Liability (<http://www.medicalcenter.net/viagrawaiver.htm>) agree to the \$85.00 consultation fee and I am legally entitled to receive Viagra. I also understand that The Pill Box Pharmacy shipping charges are in addition to my calculated totals and will vary with destination and will range from: Inside U.S. \$9.00 (waived for orders inside U.S. of 20 tablets, or more). Canada \$18.00 and Outside the U.S. \$50.00 to \$79.00, and I am responsible for all import charges.

Signature: _____ Date: _____



This is our Wholesale Order Page.



courtesy AltaVista Translation Services

This page should be used by domestic and international companies wishing to make wholesale purchase(s) of our products, including Viagra.

If you are only ordering 90 pills (or less) of Viagra, [CLICK HERE](#) to order using the Retail Order Page.

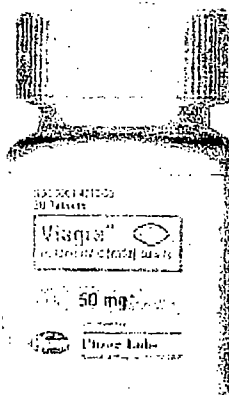
Notice: All International shipments are subject to U.S. export laws and the import restrictions of the destination country.

To Order, please follow these two steps:

Step 1: Complete the form below:

Step 2: We will contact you (via e-mail) regarding volume pricing, shipping costs, and your payment options.

Please Select from the following Products:



VIAGRA

mfg: Pfizer

At wholesale, each bottle contains 30 tablets

Minimum Wholesale Order is 4 bottles. For less, please [CLICK HERE](#) to order using the Retail Order Page.

Please Select Quantity desired:

Viagra 25mg		bottles / tablets
Viagra 50mg		bottles / tablets
Viagra 100mg		bottles / tablets

If you have not done so already, you may wish to [CLICK HERE](#) to review the Frequently Asked Questions regarding Viagra, or visit <http://www.viagra.com> for prescribing information, including contraindications.

Propecia
mfg: MSD

Wholesale Propecia is available by the case.

Each case contains 6 bottles of 30 pills each.

Price: \$355.74 per case (additional volume discounts may apply)

Please select the number of cases:

Please list any Other Products for
which you would like a price quote:

Shipping Instructions

(all fields are required for proper submission - thank you)

Company:

First Name:

Last Name:

E-Mail

Your complete Shipping Address
including Country:

Phone:

Fax:

How did you find out about The Pill
Box Pharmacy?

Special notes
or comments

Subscribe to our newsletter?

☒ Yes ☐ No

Click ONCE to Send

[Home](#) | [Products](#) | [About Wellness](#) | [Contact Us](#)
[FAQ's](#) | [Tips](#) | [Links](#) | [About Us](#)

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High effective treatments and products

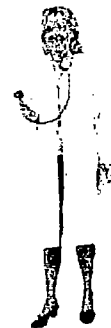
for

Psoriasis, Herpes, Dandruff, Impotence (Viagra), Arthritis, etc

Express to
VIAGRA



Enter here



SwissPharma Laboratories Ltd.
32 Vulkanstrasse , Zurich - Switzerland / Tel.: + 41 1 274 2038 - Fax: +41 1 274 2343
201 North Dupont Parkway, New Castle, DE 19720 - USA / Tel.: +1 888 866 4804 - Fax: +1 703 995 0360

[Home page](#) / [Available treatments](#) / [Who are we?](#) / [Order here](#) / [VIAGRA page](#)

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Retail Order form

No more than 10 pills

PRODUCTS	Qty Price
VIAGRA 25mgr	NOT AVAILABLE
VIAGRA 50mgr	NOT AVAILABLE
VIAGRA 100mgr	Choose quantity
Handling & Delivery	US\$ 25.00

- SECOND: Your name and address

* = Required field to process your order	
First name *	
Last name *	
Company	
Street / Suite # *	
City *	
State *	
Zip code *	
Country *	>
Phone number *	
Fax number	
E-mail address Please make sure this is a working address! *	 All correspondence will be sent to this E-mail address
CODE of the SwissPharma agent assigned to you	If you do not know the CODE ask your agent or leave it blank

Pfizer and the Health Authority recommend obtaining a medical history and cardiovascular status of the patients prior to initiating any treatment. In order to issue the prescription for your order we ask you to answer the following questions. (This is a free prescription. If you have one from your own physician you can send it by fax). (You should answer all questions)	
Your genre is.....	☐ Male - ☐ Female
Your age is.....	Choose your age 
Do you / did you suffer any heart disease?	☐ Yes - ☐ No
Are you under any medical treatment with organic nitrates? (if you are not sure please ask your physician)	☐ Yes - ☐ No
Do you take nitrates that are inhaled for recreational use (including amyl nitrate/nitrite or "poppers")?	☐ Yes - ☐ No
Are you affected by any anatomical deformation of the penis? (such as angulation, cavernosal fibrosis or Peyronie's disease)	☐ Yes - ☐ No
Do you have conditions which may predispose to priapism (such as sickle cell anemia, multiple myeloma, or leukemia).	☐ Yes - ☐ No
The recommended dose is 50 mgr taken, as needed, approximately 1 hour before sexual activity. However, VIAGRA may be taken anywhere from 4 hours to 0.5 hour before sexual activity. Based on effectiveness and toleration, the dose may be increased to a maximum recommended dose of 100 mgr or decreased to 25 mgr. The maximum recommended dosing frequency is once per day. Have you understood this?	☐ Yes - ☐ No
There is a degree of cardiac risk associated with sexual activity; therefore, you should consider your cardiovascular status prior to taking this medicine. If you have taken Viagra during last 8 hours you should advise anybody who is trying to administer you any medicine or treatment. Have you understood this?	☐ Yes - ☐ No
Do you suffer any illness / disease?. State it, please.	

- **THIRD: Delivery address** (Do not fill if same than above- POBoxes not accepted)

First name	
Last name	
Company	
Street / Suite #	
City	
State	
Zip code	
Country	> 
Phone number	

• **FOURTH: Payment**



We only accept credit cards.	
Type of credit card *	Visa
Card no. e.g., 1234-5678-9876-5432 * (Please double check your card number)	
Expiration date (MM-YY) *	
Name on the card *	
Cardholder's address *	
If you don't want to submit your credit card information through the Internet, write "I will send later" instead of the number, fill out this order form, and click the "SUBMIT NOW" button below. Then just fax your credit card number and Name to: USA / CANADA: Phone/Fax 703 995 0360 or Toll FREE Phone/Fax: 888 866 4804 SWITZERLAND , ZURICH Fax: + 41 (1) 274 2038 (We do not give live operator assistance) Or You can write in this form the first half of your credit card number and send the remaining half by e-mail to: Orders@SwissPharma.com	
Any comment you'd like (max. 30 words)	
To send your order press the SUBMIT NOW button below (please click only once and wait for the confirmation) SUBMIT NOW (click once) START OVER	

[To SwissPharma](#) | [VIAGRA home page](#) | [ORDER HERE](#) | [Pfizer information](#) |
[Consumer information](#) | [Frequently asked questions](#) | [US FDA information](#) | [Letter to Doctors](#) |

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Wholesale Order form

10% discount apply to orders over 5 bottles

PRODUCTS	Number of 30 pills bottles
VIAGRA 25mgr	NOT AVAILABLE
VIAGRA 50mgr	NOT AVAILABLE
VIAGRA 100mgr (Bottle 30 pills)	1 US\$ 510 per bottle + US\$ 25 handling and delivery

SECOND: Your name and address

* = Required field to process your order	
First name *	
Last name *	
Company	
Street / Suite # *	
City *	
State *	
Zip code *	
Country *	>
Phone number *	
Fax number	
E-mail address Please make sure this is a working address! *	 All correspondence will be sent to this E-mail address
CODE of the SwissPharma agent assigned to you	If you do not know the CODE ask your agent or leave it blank

- THIRD: Delivery address (Do not fill if same than above)

First name	
Last name	
Company	
Street / Suite #	
City	
State	
Zip code	
Country	> 
Phone number	

• **FOURTH: Payment**

<u>Accepted ways of payment are:</u>	
• Swift or Transfer to SwissPharma bank account • Money order (It can take 20 to 30 days to clear up funds) • Bank check (It can take 30 to 45 days to clear up funds)	
Indicate your selected way of payment ☒ Swift / transfer 	
We will send to your E-mail address the confirmation of the order, total price and instructions to proceed to the payment SwissPharma Ltd. USA / CANADA: Phone/Fax 703 995 0360 or Toll FREE Phone/Fax: 888 866 4804 SWITZERLAND , ZURICH Fax: + 41 (1) 274 2038	
Any comment you'd like (max. 30 words)	
To send your order press the SUBMIT NOW button below (please <u>click only once</u> and wait for the confirmation) SUBMIT NOW (click once) START OVER	

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zum Deutschen

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Problems with

Dandruff,

Seborrhoea, and

Psoriasis ?

The solution

SKIN-CAP

**No more
flakes
or itching**

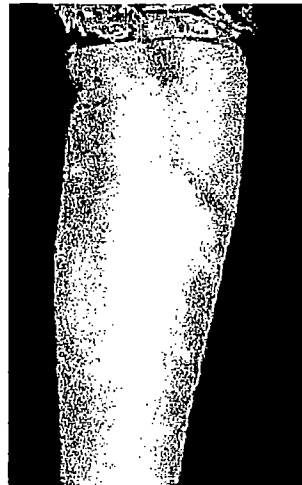


In less than a month this cosmetic product will put an end to the inflammation , itching, redness of the skin and flakes. Thanks to its activation principle, **SKIN-CAP** will achieve these results:

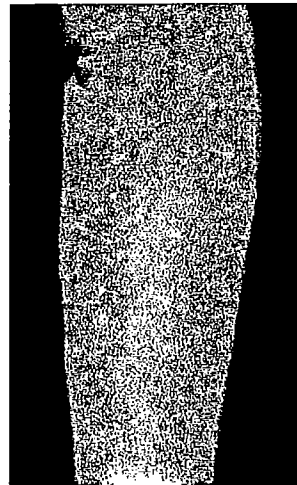
Psoriasis and seborrhoea



1st week



2nd week

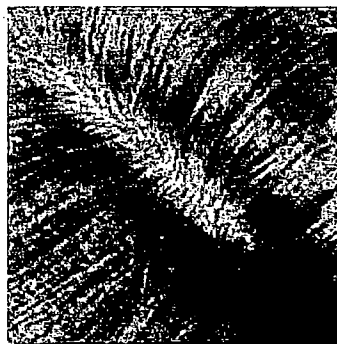


3rd week

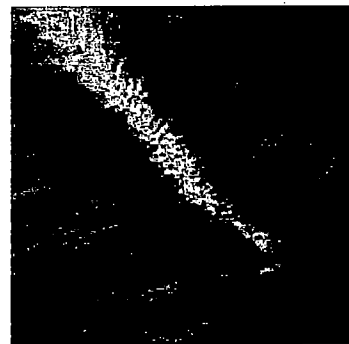
Dandruff



First day



Second day



Fourth day

This is what some Skin-Cap users say. They have offered their telephone numbers if you want to ask them something about their experience.

- I've used Skin-Cap and it is the **ONLY** product to ever cleared up my psoriasis completely without a trace. It is a miracle product. I was devastated when the FDA made the remove it from the US market for strictly political reasons. I was so happy to find you and that I can now receive it again, and clear up a case of psoriasis that no product before or after I found Skin Cap. My eternal gratitude for helping me heal again. Best regards,
Jeff Shiverdaker
Phone: USA 408 870-0638 , Email : theshiv@usa.net

- I have had psoriasis that covers portions of my body for the last 25 years and have learned to live with it.
My scalp is another problem. Hair does not hide the flakes. Just a movement of my head

and the air is full of falling skinflakes. My doctor tells me it will never go away and has prescribed derma smoother which only provided a slight relief. Personally I tired of wearing the shower cap so often. I tried Skin-Cap and it started working right away. I was elated with the product until my pharmacy stopped stocking it. Thank You SwissPharma for understanding and providing something that really works.
Tessa Markovich
Phone : USA 510-614-9655 Time availability : afternoon
Email : ivanho@earthlink.net

- It was July of 1997 when I first tried the product. It worked better than anything I have ever used before. I have had psoriasis for about 19 years. When I found this product I gave it a try I figured I had nothing to lose and to my amazement it worked!
Calvin Kreider
Phone : USA 806-665-7720 - Time availability : evening
Email : forrest@hpnts.net

-
- For SKIN-CAP usage and data sheet [CLICK HERE](#)
 - If you are not aware of "SKIN-CAP controversy" **we strongly** recommend to [CLICK HERE](#)
 - For additional extraordinary SKIN-CAP Testimonials [CLICK HERE](#)

**CLICK HERE TO
ORDER NOW!**

MONEY BACK GUARANTEE: If after 1 month treatment you are not satisfied with this product please contact your AGENT or fax SwissPharma with your first and last name, product you bought, and number and expiration date of the credit card through which you made the payment. We shall refund your money to your credit card account.



Biological studies at SwissPharma lab

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Quality Health, Inc.

Medicines

for the

Modern Mainstream

Quality Health, Inc. supplies smart drugs, nootropics, anti-aging remedies, pharmaceuticals and other complementary health care products directly to the consumer by mail order at very competitive prices.

Using established pharmaceutical companies and reputable manufacturers of generic medications for its source of products, QHI's goal is to provide the highest quality health care items with the best prices available.



All UK citizens must read this first

Quality Health, Inc.

**401 Langham House
29-30 Margaret Street
London W1N 7LB
England**

Fax: 44-171-580-2043

Email: sales@qhi.co.uk



Freedom of Speech on the Internet



[Home Page](#)

Quality Health, Inc.

Pharmaceutical Products

Updated 30 March 1999

Alphabetical Product Index

Click on item to view it.

 returns you to this Index.

 takes you off-site. Please bookmark this page to make your return easier.

- [Ampamet \(aniracetam\)](#)  [Details](#)
- [Diphantoine \(Phenytoin\)](#)
- [GH3 \(Original Aslan Formula\)](#) 
- [Hydergine \(Ergoloid Mesylates\)](#)
- [Hydergine FAS](#)
- [Inderal \(Propranolol\)](#)
- [Jumex \(Deprenyl\)](#)
- [L-Tryptophane \(Amino Acid\)](#)
- [Lucidril \(Centrophenoxine\)](#)
- [Melatonin \(Synthetic\)](#)
- [Neupramir \(pramiracetam\)](#)
- [Olmifon \(adrafenil\)](#)
- [Parlodel \(Bromocriptine\)](#)
- [Proscar \(finasteride\)](#)
- [Provigil \(modafinil\)](#) 
- [Trentoin Kefran \(Retin A Gel\) 0.05%](#)
- [UCB Nootropil \(Piracetam\)](#)
- [Vasopressin \(Syntopressin\)](#) [Read This](#)
- [Vinpocetine](#)
- [Yohimbine Hydrochloride](#)

Ampamet (aniracetam)

Ref:	20 tabs x 750mg		
45	UK £ 23.28	US \$ 37.25	Sfr 57.07

 [Details](#) This product works in the same way as Piracetam but is more potent. Tests are being conducted with this medicine as a possible treatment for Alzheimer's disease.

Do not take if you are pregnant, breast-feeding, are under the effect of alcohol and/or amphetamines.



Diphantoine (Phenytoin)

Ref:	100 tabs x 100mg		
24	UK £ 4.53	US \$ 7.25	Sfr 11.11

This product is known as a treatment for epilepsy but studies have shown it to be effective in treatments of drug addiction, alcoholism, hypoglycemia and depression. It works by stabilizing electrical activity at the cell membrane.

Do not take if you are pregnant, breast-feeding, have cardiac or renal problems.



GH3 (Original Aslan Formula)

Ref:	25 tabs x 100mg		
43	UK £ 10.00	US \$ 16.00	Sfr 24.51



GH3 is a MAO inhibitor. According to Smart Drugs and Nutrients Volume I by Morganthaler and Dean, people using GH3 report increased energy levels, alertness, and improvement in mood.

Do not take if you are pregnant, breast-feeding, or are taking other medicines that should not be taken with a MAO inhibitor.



Hydergine (Ergoloid Mesylates)

Ref:	28 tabs x 4.5mg		
22	UK £ 11.56	US \$ 18.50	Sfr 28.35

This product is an ergot preparation used in the treatment of poor memory, confusion, depression and lack of motivation. It stimulates brain cell metabolism to increase the use of oxygen and nutrients.

Do not take if you are pregnant, breast-feeding, or have low blood pressure.



Hydergine FAS

Quality Health, Inc.

Supplements Products

Updated 30 March 1999

Alphabetical Product Index

Click on item to view it.



returns you to this Index.



takes you off-site. Please bookmark this page to make your return easier.

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- [Choline](#)
- [Chromium Picolinate](#)
- [Co-Enzyme Q10](#)
- [DHEA Pharmaceutical Grade](#)
- [Ginkgo Biloba Extract 24%](#)
- [Glucosamine Sulfate](#)
- [Grape Seed Extract](#)
- [L-Arginine](#)
- [L-Glutamine](#)
- [L-Lysine](#)
- [N-Acetyl Cysteine](#)
- [Phosphatidyl Mix \(Lecithin\)](#)
- [Saw Palmetto Extract 85-95%](#)
- [Selenium](#)
- [St John's Wort 0.3% Hypericin](#)
- [Zinc Picolinate](#)

Cat's Claw

Ref:	100 caps x 400mg		
50	UK £ 4.06	US \$ 6.50	Sfr 9.96

Researchers have reported that the herb Cat's Claw (*Uncaria tomentosa*) contains six unique alkaloids that can provide benefits for a host of conditions. Of particular interest is its reported ability to cleanse the entire intestinal tract which could be very helpful for those suffering with stomach, bowel and ulcer disorders. Cat's Claw has also been noted for its ability to boost the immune system.

As Cat's Claw stimulates the immune system and helps in the rejection of foreign matter, it should not be taken by organ transplant patients or those persons considered candidates for a transplant.

Not recommended for pregnant or nursing women.



Choline

Ref:	100 caps x 250mg		
55	UK £ 4.37	US \$ 7.00	Sfr 10.72

Choline supplements appear to protect against age-related decline in memory capacity and precision. Dr. Christina Williams, an associate professor in the Department of Experimental Psychology, has discovered that giving extra choline to rats at certain developmental stages leads to changes in the brain and improvement in memory.

No known contraindications.



Chromium Picolinate

Ref:	100 caps x 200mcg		
60	UK £ 4.06	US \$ 6.50	Sfr 9.96

A study presented at the 1996 American Diabetes Association meeting in San Francisco suggests an enhanced role for the nutritional supplement Chromium Picolinate in the treatment of diabetes. Picolinic acid, which occurs naturally within the body, has been found to be the most effective chelator of metal ions. Chromium Picolinate is 10 times more absorbable than chromium chloride used in many multiple vitamin and mineral supplements and many times more absorbable than the chromium found in most foods.

No known contraindications.



Co-Enzyme Q10

Ref:	30 caps x 60mg		
65	UK £ 8.44	US \$ 13.50	Sfr 20.68

Coenzyme Q10 is a critical component of the electron transport pathway in the energy producing mitochondria. Without sufficient CO-Q10, highly reactive electrons may cause damage to the lipids, proteins and DNA contained in the mitochondria. This may lead to energy insufficiency in tissues with high energy consumption such as the heart.

No known contraindications.

The Korean Connection: Quality Meds



.com



Make Money with our webmaster link program

Quality Pharmaceuticals shipped to you directly from Korea.

"Lab tested 100% legitimate ... shipping methods are excellent!" -*Musclebuilder, Winter 1996 Issue.*

10% discount on all orders over \$500.00
Special discounts available on larger orders!

Anadrol 50 (Oxymetholone)	\$2.50 per tablet.	BUY 200 TABLETS FOR \$450
Spiropent (Clenbuterol Hydrochloride)	\$0.75 per 20m.c.g. tablet.	BUY 60 FOR \$100
Depovirin 250 (Testosterone Cypionate)	\$18 per ampule.	\$15 PER AMP. ON ORDERS OVER 10.
Deca Durabolin (Nandrolone Undecionate)	\$150 per box.	Organon 50mg. ampule @ 10 per box
Anabol (Methandienone) Pink Dianabol 5mg	\$1.00 per tablet.	Minimum 100 tablets
Nolvadex (Tamoxifen Citrate) 10mg.	\$2.00 per tablet.	
Clomid (Clomiphene Citrate) 50mg	\$2.00 per tablet.	
Testo 25 (Methyl Testosterone) 25mg.	\$0.75 per tablet.	
Aldactone (Spironolactone) 25mg	\$1.00 per tablet.	
Lasix (Furosemide) 20 mg.	\$1.00 per tablet.	
Capril (Captopril) 25mg	\$1.00 per tablet.	
Comthyroid (Levothyroxine Sodium .05mg. Liothyroxine Sodium .0125 mg.)	\$0.75 per tablet.	
Menoferil (Cyclofenil) 200mg.	\$2.00 per tablet.	
Human Chorionic Gonadotropin	\$25.0 per ampoule (HCG 5000 i.u.)	
Accutane (Isotretinoin 10 mg.)	\$2.00 per tablet.	Contains Vitamin B (2 mg).
Cetabon (Stanozolol) Winstrol	\$1.00 per tablet.	

Dianabol and Depovorin samples are available for a \$10 shipping and handling charge. All tablets are marked and scored. All ampoules are foil sealed and properly labelled. Most orders come with inserts but in some cases bulkier bottles and packaging will not be sent.

ORDERING INSTRUCTIONS

Payment must be made in U.S. dollars. Please do not send checks or money orders as they cannot be processed. Send high denomination bills in a carbon-lined envelope or wrap it in carbon paper. Send your payments via GLOBAL PRIORITY POST. Initial orders can be smaller (\$100-\$200 range) to determine the quality of our products. But we would prefer larger orders as a general rule. All orders totalling over \$500 U.S.D. will have a bonus 10% of their requested product added to the shipment. Be sure to include your return address with the order. Your parcel will arrive via regular post. We cannot use an express courier as they are more closely scrutinized at customs and usually require your signature. You will NOT have to sign any type of receipts. All ampoules will be sent in small padded envelopes, tablets will be sent flat in small-sized envelopes. We follow strict packaging guidelines to ensure that you will receive your order without delay. To date, ALL shipments have passed customs.

SEND ALL ORDERS TO:

Mr. Kim
KEO BOX 1501
SEOUL, KOREA.
110

If you have any questions, comments, or suggestions email koreamed@knotwork.com

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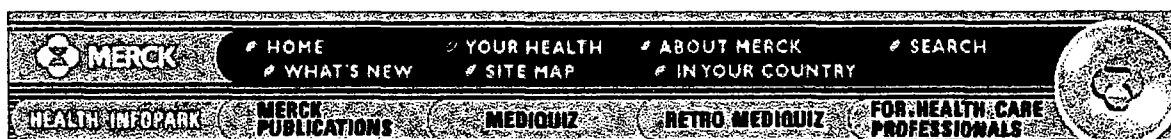
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OSTEOPOROSIS

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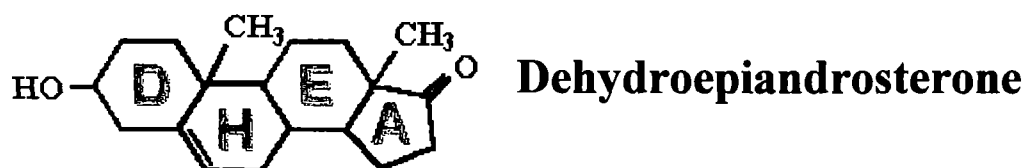
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[Involving DHEA, Melatonin, and](#)

[Testosterone](#)

[New Theory of AIDS](#)

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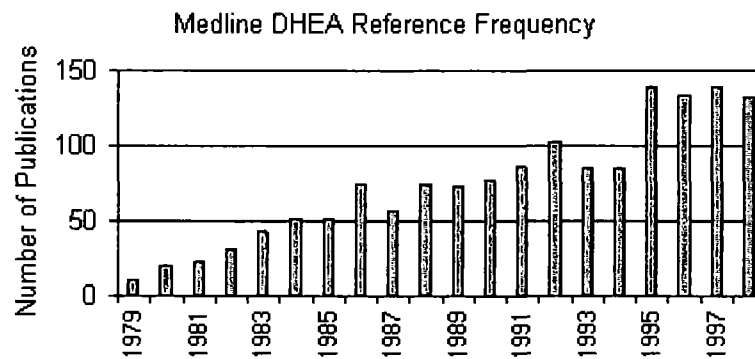
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Questions about the theory presented in the above articles may be directed to J. M. Howard, 1037 N. Woolsey, Fayetteville, AR 72701, USA.



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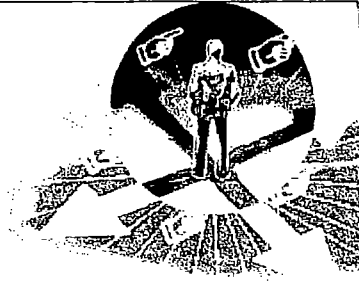
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LYCOPENE

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LYCOPENE

General Information

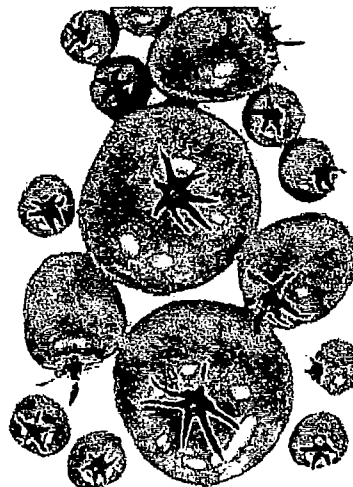
Lycopene: The Facts

- Lycopene is an open-chain unsaturated carotenoid that imparts red colour to tomatoes, guava, rosehip, watermelon and pink grapefruit.
- Lycopene is a proven anti-oxidant that may lower the risk of certain diseases including cancer and heart disease.
- Research shows that lycopene in tomatoes can be absorbed more efficiently by the body if processed into juice, sauce, paste and ketchup. The chemical form of lycopene found in tomatoes is converted by the temperature changes involved in processing to make it more easily absorbed by the body.
- The health benefits of lycopene can be enjoyed by drinking as little as 540 mL (about two glasses) of tomato juice a day.
- In the body, lycopene is deposited in the liver, lungs, prostate gland, colon and skin. Its concentration in body tissues tends to be higher than all other carotenoids.
- Regular high consumption of fruits and vegetables is recommended as part of healthy eating. Epidemiological studies have shown that high intake of lycopene-containing vegetables is inversely associated with the incidence of certain types of cancer. For example, habitual intake of tomato products has been found to decrease the risk of cancer of the digestive tract among Italians.
- In one six-year study by Harvard Medical School and Harvard School of Public Health, the diets of more than 47,000 men were studied. Of 46 fruits and vegetables evaluated, only the tomato products (which contain large quantities of lycopene) showed a measurable relationship to reduce prostate cancer risk. As consumption of tomato products increased, levels of lycopene in the blood increased, and the risk for prostate cancer decreased. The study also showed that the heat processing of tomatoes and tomato products increases lycopene's bioavailability.
- Ongoing research suggests that



lycopene can reduce the risk of macular degenerative disease, serum lipid oxidation and cancers of the lung, bladder, cervix and skin.

- Studies are underway to investigate other potential benefits of lycopene - including the H.J. Heinz Company sponsored research at the University of Toronto and at the American Health Foundation. These studies will focus on lycopene's potential in the fight against cancers of the digestive tract, breast and prostate cancer.



REF.: Stahl, W. and Sies, H. **lycopene: a biologically important carotenoid for humans?** Arch. Biochem. Biophys. 336: 1-9, 1996

Gerster, H. **The potential role of lycopene for human health.** J. Amer. Coll. Nutr. 16: 109-126, 1997



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