ORGANIZATION OF AMERICAN STATES

INTER-AMERICAN DRUG ABUSE CONTROL COMMISSION

Drugs in Cyberspace: Understanding & Investigating Diversion & Distribution of Controlled Substances via the Internet

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PART I: INTRODUCTION

CHAPTER 1: SCOPE OF THE PROBLEM

A. Purpose of this Guide

While the abuse and trafficking of narcotic and psychotropic drugs is a long-existing concern, the rise and spread of new technologies, specifically the Internet, exacerbates the issue. Illegal distribution of drugs over the Internet, in many forms, is a major concern in some countries and is likely to affect other countries soon. Countries may find that domestic abusers turn to the Internet to obtain prescription drugs. This is likely to occur increasingly as countries begin to implement legislation (or stricter legislation) to curb pharmaceutical abuse at traditional "brick and mortar" pharmacies. Countries may also find that their territories are used as one in a number of nodes in the complex web of Internet-based trafficking. This Guide will outline the scope of the issue, its elements, and the tools for governments to respond to the issue.

B. Two Categories of Substances Sold Over the Internet

The Internet is used in the illegal trafficking of two categories of controlled substances:

(1) illicit controlled substances (e.g. heroin, cocaine, MDMA ("Ecstasy"), marijuana)1; and

(2) licitly produced pharmaceutical controlled substances (e.g. oxycodone / OxyContin, hydrocodone, and benzodiazepines); and

1 Although substances such as cocaine, heroin, methamphetamine, and gamma hydroxybutate (GHB) may be licitly manufactured, distributed, and dispensed, their legal use is so limited compared to their trafficking for illegal use that they are considered illicit controlled substances for purposes of this Guide.

(3) counterfeit controlled substances represented as legitimate pharmaceuticals.

Illicit controlled substances are illegal from production/importation to ultimate use; that is, they are illegally produced, usually in clandestine laboratories, or illegally imported and then illegally distributed (trafficked). The second category includes substances that were produced legally, in closely regulated pharmaceutical settings, but are then offered for sale over the Internet under circumstances so uncontrolled as to virtually guarantee, and even promote, diversion to illicit uses. The third category is comprised of counterfeit controlled substances that are represented as legitimate pharmaceutical products, intentionally created and marketed as a licitly produced pharmaceutical drug. For the purposes of this Guide, pharmaceutical products may include the second and third categories.

Selling illicit controlled substances over the Internet is, on its face, illegal; they are contraband. On the other hand, legitimate pharmaceutical substances sold over the Internet are not necessarily illegal. They *may* be offered and sold over the Internet for legal consumption, assuming: (1) that the consumers, authorized prescribers, and pharmacies are all located within the same country; and (2) that they operate with procedures that mirror the protections against fraud and abuse that are present in a conventional pharmacy. Within the United States there are several legitimate Internet pharmacies. They operate similarly to normal “brick and mortar” pharmacies, requiring legitimate prescriptions based on a doctor-patient relationship, a diagnosis, and treatment of a bona fide medical condition. However, the majority of Internet pharmacies sell drugs

without safeguards against diversion. Online websites typically allow pharmaceutical substances to be sold without a paper prescription or medical consultation. If there is a consultation requirement, it may merely be an "online consultation," typically a questionnaire with the default answers pre-filled to justify the drug sought, followed by an after-the-fact sign-off by a cooperating medical practitioner.

While Internet distribution of both types of substances should concern law enforcement, this Guide will focus primarily on the distribution of pharmaceutical drugs.

C. Varying Stages of the Internet Drug Distribution Problem

With respect to Internet pharmacies, countries generally fall into one of three categories.

1. Some countries, such as the United States, are already in the grip of the problem. Such countries need to investigate cases as well as prevent further proliferation of rogue online pharmacies.
2. Some countries are not yet afflicted but likely will be as the more affected countries clamp down on online pharmacies, and operators seek a weaker regulatory environment. These countries need to be aware of the problem and the prophylactic measures that may be implemented.2

2 The experience of one state in the United States is illustrative. After Internet pharmacies began operating in the state, regulatory and law enforcement authorities did not respond in a timely or dispositive manner. This led more online operators to be drawn to that state, where they have flourished.

3. Still other countries may not believe that they are afflicted when, in reality, they simply have failed to detect illegal Internet operations within their borders. These countries need to understand how to recognize the problem and then proceed with investigative efforts and preventative measures for the future.

D. Scope of the Problem in the Present and Future

Internet pharmacies have facilitated a growing problem: prescription drug abuse. In the United States, prescription drug abuse is the only "growth area" in illegal substance abuse today. According to the 2004 annual National Survey on Drug Use and Health (NSDUH), 6.0 million persons, or 2.5% of Americans age 12 and older, engaged in nonmedical use of pharmaceutical controlled substances in the past month; 14.6 million people, or 6.1%, had misused such drugs in the past year; and 48 million persons had abused pharmaceuticals at least once in their lifetimes.3 More Americans now abuse prescription drugs than all the other drugs of abuse combined, except marijuana,4 and the NSDUH survey showed that this is the category of drugs with the most new abusers (2.4 million in 2004).5

The dispensing of pharmaceutical drugs over the Internet facilitates this prescription drug abuse problem. The Internet makes the process more accessible, convenient, and virtually anonymous for both the buyer and seller. Although it is difficult to ascertain the number of websites selling prescription

3 The NSDUH is conducted under the auspices of the Substance Abuse and Mental Health Services Administration (SAMHSA), an agency within the Department of Health and Human Services. It can be accessed at https://nsduhweb.rti.org.
4 NSDUH 2004, Figure 2.

drugs, it has clearly increased in recent years, with most offering either an "online consultation" or a limited telephonic interview with a physician. These online consultations could simply involve the consumer filling out an online questionnaire that may or may not require review by a doctor. While this procedure may have the appearance of legitimate involvement by a health practitioner, it fails to constitute a proper doctor-patient relationship, as would an in-person visit and physical examination by a doctor.

Youth access to and comfort with the Internet exacerbates the problem. There are no controls in place to prevent the sale of pharmaceuticals over the Internet to children, who are especially vulnerable. It is even possible for children to obtain pharmaceutical substances after entering true and accurate information regarding their age, as long as they have access to a credit card. In 2003, 2.3 million teens (ages 12-17) admitted to abusing a prescription drug in the past year. A 2005 survey revealed that 19% of teens admit to abusing prescription drugs in their lifetime. Fifty-six percent of teens believe that the availability of prescription drugs is easier than illicit drugs, likely due in part to the lack of regulation of rogue Internet pharmacies.

Currently, the most frequently offered controlled prescription drug over the Internet are opiods such as hydrocodone and oxycodone, benzodiazepines such as Xanax and Valium, and weight loss medications such as phentermine.

CHAPTER 2: UNDERSTANDING INTERNET PHARMACIES

A. Unique Aspects of the Internet

Globally, the Internet may be increasingly commonplace, but its technical complexities remain a mystery to many people. Use of the Internet as a vehicle to dispense drugs presents novel investigative challenges as well as opportunities to the trained investigator. The primary challenge lies in identifying who or what constitutes an "Internet pharmacy," such that the culpable individual or entity may then be appropriately targeted, investigated, and prosecuted. Because of the nature of the technology, this identification is not a simple matter. There are a number of players including the website, web host, ISP, web entrepreneur, pharmacist, physician, source of supply, and so on. For purposes of effectively responding to the problem of illegal distribution of drugs via the Internet, it is necessary to delineate the participants and elements of an illicit online drug distribution system, approaching each element with an understanding of their roles, the evidence they may supply, and their likely culpability.

Participants:

(1) pharmacist or other individual responsible for the drug dispensation

(2) physician/practitioner authorizing dispensing of drugs

(3) courier and delivery services; other drug transportation methods

(4) credit card and third party financing companies

(5) payment facilitating and processing companies/websites

(6) manufacturing and drug distribution companies

(7) call centers and operators

(8) web entrepreneur: creator of the website

Locations:

(9) countries of drug origin

(10) countries from which drugs are distributed to ultimate user

(11) countries through which drugs are transported

(12) countries involved in the money trail

Technology:

(13) website: collection of web pages, typically common to a particular domain name on the Internet; can originate from an individual, business, or organization; often contains hyperlinks to other websites, blurring the line between distinct websites; can be dynamic with frequently changing information

(14) web host/server: a company that provides server space and hosts the website; analogous to a publisher for books; provides Internet connectivity, typically in a data center; can also be provided for servers not located in their data center, complicating tracking matters

(15) Internet Service Provider (ISP): a company that provides an Internet connection; can be started by almost anyone; has physical control over the content of the website, but may or may not be the web entrepreneur

(16) Domain name: the address or URL of a web site; in technical terms, the text name corresponding to the numeric IP address of a computer on the Internet (for example: www.netlingo.com is the domain name for the numeric IP address "66.201.69.207")

(17) IP address: unique address of each computer on the Internet; aids in tracking location

(18) Domain name registrars: organizations through which one can register a unique domain name, for a fee (for example: www.networksolutions.com and www.GoDaddy.com)

B. Investigative Challenges

It is difficult for authorities to track, monitor, and shut down illegally operating Internet pharmacies because websites are easily created, removed, or altered by, for example, changing their name or web address, all in a very short period of time. Rogue pharmacy websites typically do not provide identifying information regarding their location or source, lending a sense of anonymity to the process. Savvy web entrepreneurs and online operators routinely relocate, without any real reason, as a precaution against detection. A routine web search illustrates this phenomenon; sometimes a link to a closed down site will automatically redirect the user to a new site by the same site owner, as indicated by similar layout and wording.

Many of the bigger Internet pharmacies have several "portal sites"— a network of sites that refer users to one online anchor pharmacy, which is the site that actually offers to sell the drugs. It is on the anchor site that the customer places their order and pays. At some point, the drugs must come from a physical, brick-and-mortar pharmacy (or warehouse or other distributor) that

provides the drugs. The pharmacy may itself operate the website, or the anchor site may then send orders to a pharmacy. Different websites, located anywhere in the world, might use the same pharmacy. Some investigative challenges include determining the physical location of the anchor site, the identity of the website operator, as well as the physical location of the physical pharmacy and the identity of the pharmacy's operators.

The notion of what constitutes an "Internet pharmacy" and where it is "located" can have various meanings, each aspect giving rise to unique investigative challenges and opportunities.

(1) The place of origin of drugs as advertised by the website: The origin of the drugs as advertised would be useful to know, but websites may or may not provide this information. At any rate, statements of drug origin by websites are notoriously unreliable.

(2) The physical location of the computer containing the website data: The location is of very limited use because data on the Internet can be transmitted from anywhere in the world, but the data on the computer is helpful in building the case.

(3) The location of the business or individual running the website: While this information could potentially lead to prosecuting the individual responsible for the website, it can be difficult to ascertain because registration information provided, for example, to a domain registrar or ISP may be inaccurate. (Domain registrars and ISPs are high-volume

operations and are not presently set up to verify the identifying information provided.)

(4) The physical address from which the drugs are actually shipped: The drugs themselves cannot exist in cyberspace (assuming that the website is not a total fraud and the drugs are actually ordered and shipped). The fact that they must originate from somewhere and go somewhere else brings Internet investigations back in line with traditional investigations.

PART II: PREVENTION

CHAPTER 3: AWARENESS, EDUCATION AND TRAINING

Consumer education would go a long way toward decreasing the number of websites which illegally sell pharmaceutical drugs. Industry should be encouraged to provide Internet advertisements, pop-ups, and the like when searches for illegal prescription drugs are conducted. For example, at the time this Guide was drafted, a simple Google search for obtaining prescription drugs without a prescription yielded not only several Internet pharmacy websites, but also several accompanying consumer alert websites. These alerts lead potential consumers to sites explaining the dangers and illegalities of obtaining controlled substances online. Moreover, the financial services industry, including credit card companies and payment services, should be made aware of this problem in

order to flag rogue Internet pharmacies and avoid the use of their services for improper and illegal transactions. Transportation courier firms and internet service providers must also be made aware of the problem as their services are being used to conduct illegal business transactions.

Furthermore, public service announcements and media exposure would help spread the message to parents and teens unaware of the extent of pharmaceutical drug abuse and its easy online availability. Parents, especially, may not be aware of the ease with which their children and teens can access and order drugs from Internet pharmacies, due to the anonymity involved and lack of in-person interaction. In addition, hotlines and teen websites provide further education.

The public should also be educated that their chances of receiving counterfeit drug products from illegally operating Internet pharmacies are high. For example, in the United States, only about 50% of consumers receive the authentic product.

Public awareness campaigns should, however, be sensitive to the nature of the problem at hand, and should not get ahead of the problem. In countries where Internet pharmacies are non-existent or very limited, a public awareness blitz may give drug abusers and unsavory entrepreneurs ideas they had not previously considered about how to access drugs or to start a lucrative, illicit business. Where information is provided, it should be accurate and balanced.

Government officials must also be educated about the extent of the problem. Obviously, a much greater level of awareness and training is needed

for regulatory drug control and law enforcement authorities. To effectively investigate an allegedly illegal sale of pharmaceutical drugs via the Internet, authorities need to understand the issue of Internet pharmacies and the technology (see Chapter 2). Training classes should be provided to all investigators, especially if they do not already have a scientific and/or technological background. For example, authorities should understand the common warning indicators for a website illegally selling pharmaceutical drugs—lack of prescription requirements, discreet shipment methods, delivery by mail or to a P.O. Box, quantities, and other sales procedures. In recruiting law enforcement to conduct Internet pharmacy investigations, training and appropriate technical backgrounds are vital to consider.

PART III: ADDRESSING THE PROBLEM

CHAPTER 4: RECOGNIZING THE PROBLEM

A country may be host to one or more aspects of an Internet pharmacy but be unaware of its existence. Increased awareness for the public and Governments as noted in Part II will go far in helping to recognize this issue; however, each country also needs to perform a concrete self-evaluation to determine whether and to what extent it plays a role in the illegal sale of pharmaceutical drugs via the Internet.

In recognizing the existence of a problem, the following questions should be asked by each country of itself:

(1) whether individuals and/or groups use the Internet in their country to sell and/or purchase controlled or non-controlled substance pharmaceutical drugs (or counterfeit pharmaceutical drugs)

a. if yes —

i. identify whether these activities are occurring domestically and/or internationally, and

ii. determine whether any of these activities are legal under domestic or international law

(2) whether the country has any licensure requirements or regulatory approvals necessary to conduct domestic/international sales of pharmaceutical drugs, including those containing controlled substances, over the Internet

a. if yes, determine —

i. which law enforcement/regulatory entities are responsible for investigating Internet pharmacy cases

ii. whether these agencies received any specialized training in this area

iii. whether these law enforcement entities have the capacity

– by law or regulation, and

– by practical means –

to investigate and enforce laws that prohibit the illegal sales of drugs over the Internet through –

1. interception of Internet communications,

2. preservation of electronic communications,

3. undercover purchases, and

4. exchange of information with other states, including financial information.

(3) whether the country has undertaken measures such as increasing public awareness of the problem, educating health care providers, and engaging the private industry in voluntary cooperation

A concrete and searching inquiry along these lines will help countries assess their strengths and weaknesses in combating sales of pharmaceutical substances via the Internet. These are simply basic guidelines, but when a country identifies a weak point, it can then address it in a manner that is effective and suited to its national system of drug control and enforcement.

CHAPTER 5: LEGISLATIVE AND REGULATORY BASIS

A. The Need for Legislation

In many countries, there is a need to institute legislative and regulatory controls, thereby facilitating prosecution of the illegal sales of pharmaceuticals via the Internet. New substantive legislation criminalizing unlawful sales of drugs may or may not be necessary to reach illegal Internet sales; national laws and regulations should be reviewed to determine whether the basic laws defining drug trafficking crimes are adequate in the Internet context. Given the nature of

Internet pharmacies and the means needed to regulate them, it is more likely that countries will need to enhance investigative powers of law enforcement agencies, and new procedures for registering Internet pharmacies—and determining whether they will operate lawfully prior to granting their registration—will be necessary.

It is now axiomatic that the distribution and trafficking of controlled substances and precursor chemicals is a worldwide phenomenon. However, the Internet is the most quintessentially global means of communication and commerce available today. This expansive nature and the potential worldwide reach of Internet pharmacies argues for an attempt to harmonize national laws, as well as unprecedented cooperation, to prevent rogue online pharmacies from spreading their tentacles across the globe.

B. Key Components of Legislation

As suggested by the questions in Chapter 4, in composing new legislation or amending existing legislation, several elements should be included. First, however, if an individual country decides to prohibit the existence/operation of any Internet pharmacy—that is, disallow the dispensing of pharmaceuticals via the Internet regardless of regulations—then that country may do so. Such countries should not end their legislative inquiry at that point. The nature of the Internet is such that perpetrators may continue to run websites which dispense pharmaceuticals, regardless of prohibitive legislation, due to the anonymity involved in conducting such an operation. In this case, countries will likely find themselves investigating Internet pharmacy cases and needing some of the latter

elements of legislation outlined below, specifically items (4) through (9), to aid in their investigative techniques. If an individual country chooses to allow the existence/operation of websites dispensing pharmaceuticals, then items (1) through (3) in the list below should additionally be considered:

(1) Require a registration or license for Internet pharmacy websites and web entrepreneurs –

a. Subject to a pre-registration in-person interview and on-site inspection and

b. Subject to disclosure of the identity and location of individuals and/or entities that operate the site, pharmacies that fill their orders/prescriptions, and health professionals associated with the website

(2) Only permit physicians or other authorized prescribers to issue prescriptions, and Internet pharmacies to fill them, where the prescription is bona fide in that it is based on an in-person medical evaluation of a patient by his or her physician

a. Ensure that a legitimate doctor-patient relationship exists for this in-person medical evaluation

i. An online questionnaire should be considered insufficient

b. Ensure that the examination is conducted by a duly authorized health practitioner

(3) Designate clear lines of authority and responsibility for regulating and investigating Internet pharmacy operations

a. If authority lies in more than one entity, clearly define lines of coordination and authority between entities to avoid gaps and duplication

(4) Provide for authority to conduct undercover operations, including undercover purchases of controlled substances

(5) Provide for the ability to intercept communications, electronic or otherwise, between all parties, including the website and online pharmacy operators, the health practitioners, the pharmacy, and others.

(6) Provide for the authority for government investigators to require online operators to preserve communication and other evidence pursuant to a duly authorized request

a. Require the support of Internet service providers (ISPs) and other service industries such as credit card companies and courier services

(7) Ensure adequate authority to execute search warrants on all elements of Internet pharmacy operations

(8) Ensure that investigators have the authority to seize –

a. Computers and other technological hardware involved

b. Assets accrued from Internet narco-trafficking

(9) Provide for any other measures required to effectively institute investigative procedures against Internet pharmacies as outlined in Chapter 6

CHAPTER 6: INITIATING AND CONDUCTING AN INVESTIGATION

Identifying the illegal sale of pharmaceutical drugs via the Internet is generally accomplished through traditional investigative methods such as complaints from the general public, drugs found during routine traffic stops or search warrants, intelligence information obtained from various sources, and tips received from other law enforcement or regulatory agencies. Elements to consider when initiating the investigation are: (1) importation and exportation trends, in order to understand the flow of drugs; (2) illicit pharmacies, repackaging, and manufacturing facilities; (3) prescribing doctors; and (4) methods of financial processing. It is also important once a target has been established to perform case deconfliction and coordination (see next chapter).

One proven and successful approach to initiating an investigation is to perform undercover buys from a target website. It is imperative that the buys be conducted utilizing equipment and payment methods that ensure the anonymity of the investigator. The investigation should not end at just one undercover buy—it should continue in order to evaluate changes in drug sources, methods of shipment, and the flow of money—useful indicators of the operation of drug distribution rings.

Another source that may be used to initiate investigations is information received via seized packages or information provided by package delivery companies. Search warrants or other legally authorized processes should be executed to obtain the credit card statements of purchasers of pharmaceutical

drugs via the Internet. This serves to trace the money back to the seller, or "criminal entity" via the credit card invoice. The money can be followed from the customer to the credit card processor to escrow or other financial accounts being used to launder the drug proceeds by the target websites. If evidence of illegal activity leads to other countries, the competent authorities of the initiating country should investigate the matter with the assistance and cooperation of foreign law enforcement counterparts. Furthermore, this money trail allows authorities to identify individuals or businesses associated with the website from which the drugs were purchased and evaluate their ordering process—that is, whether the site required a legitimate prescription or consultation prior to purchasing drugs. At this point the investigation would most likely proceed to undercover purchases as described in the preceding paragraph.

In order to trace the web host and ISP, the investigator would submit the website address into a registry information search engine to view domain name registration. Information obtained from such a query usually includes registrar, contact identifiers (names, addresses, phone numbers, and email addresses of administrative and technical contacts), IP address and location, website title and description, and web host. The request would also identify additional websites operated by the same person. Registry information obtained in this manner may be fraudulent and should not be independently relied upon. If the investigator discovers that the information listed is false, he or she should employ traditional investigative methods, such as backtracking the financial information or establishing the point of origin through parcel carriers of the drugs. Authorities

should then execute a preservation letter to the custodian of such account records to preserve the evidence for a specified number of days, as related to the ongoing investigation. This preservation letter is necessary to preserve the evidence while investigators write and execute a search warrant on the location of the web host and its computer. These search warrants are aimed at finding incriminating electronic communications. Intercepts of electronic communications may also be implemented.

Ideally, the result of all these search warrants and intercepts on email accounts would be to identify the components of the drug distribution organization in its entirety, estimate the sales, and identify all related domain names as well as operational pharmaceutical websites. Once the above entities are identified, the next goal(s) may be as follows: execute search and seizure warrants; interview customers; freeze assets (e.g. bank accounts, property), and mirror computer hard drives. Internet pharmacy investigations are fluid and may disclose many unexpected scenarios. Adequate staffing and technical support will help to ensure a successful outcome.

CHAPTER 7: COORDINATION (DOMESTIC AND INTERNATIONAL)

Coordination would also avoid duplication and waste of resources. In this spirit, governments of all countries should respond to requests quickly and handle inquiries on Internet pharmacy cases seriously, provide any necessary support, and, if necessary, initiate criminal action against offenders.

Ideally, the establishment of an "Internet coordination center" would further facilitate coordination. A coordination center should involve one entity or at least oversight by one entity, with national and international agencies participating and providing input. Before initiating an investigation, law enforcement should check with the coordination center to make sure there are no other ongoing investigations regarding that same website. If there are, the coordination center should provide appropriate contact information such that the multiple countries or agencies may coordinate their efforts. The coordination center should also be a source for those in the service industry as well as for the public to call in suspicious activity.

CHAPTER 8: ACTIONS AGAINST PERPETRATORS

Penalties for use of the Internet in drug trafficking should be enhanced as compared to those for more routine illegal drug distribution. There must be a strong deterrent effect to its punishment for several reasons. First, the scope of harm to the public is greater when the Internet is involved. The nature of the Internet allows operators to sell in far greater volume, reaping far greater profits than ordinary drug trafficking, while taking advantage of the anonymity offered by the Internet. The cumulative impact of the multiplier effect and anonymity aspect is that the Internet facilitates drug trafficking on an unprecedented scale. Second, in enhancing the penalties, asset forfeiture and/or criminal fines should be considered as the Internet pharmacy business is a lucrative one and certainly is a lure for criminal organizations. Not only would this help deter future

criminals, but it would also help offset the major costs incurred in such investigations (see Chapter 9), provided that rules for the use of forfeited funds allow application of those assets to law enforcement.

In order to ensure that cases are brought to conclusion, able prosecutors must be engaged. And because the worldwide web and Internet-based investigations are not universally understood, some orientation, education, and training of prosecutors and, if possible, the judiciary would be extremely useful. As the number, scale, and sophistication of investigations warrant, it may be advisable to create a unit of specially trained prosecutors and investigators to undertake these types of cases.

CHAPTER 9: COSTS OF INVESTIGATION

Investigations into an illegally operating Internet pharmacy, or for that matter an Internet-facilitated routine drug trafficking organization, costs far more for law enforcement agencies than most other investigations. There are several reasons for this. First, the expansive nature of the Internet has a multiplicative effect as well as an anonymity factor, as discussed above. The multiplicative effect means that more people and/or entities are easily involved, requiring more resources to appropriately investigate all involved parties. Anonymity implies that more resources are required to track down and identify these involved parties in the first place. The Internet facilitates global operations as well, which means investigations must often expand overseas, involving foreign authorities and/or travel by domestic authorities. Additionally, these types of investigations

generally result in a high volume of documentary evidence. The investigator needs to consider the transport, storage, review, and analysis of this evidence. Private corporations, with government clearance, can be utilized to digitally scan and sequentially stamp the documents for easier analysis. These types of investigations require more money, more time, and more people—in short, more resources all around. This extra cost must be anticipated by governments when initiating such investigations.

However, the additional costs should not deter governments. Unlike street-level drug investigations, many steps in Internet investigations can be undertaken by trained staff using the computer and the Internet – ironically, the same means as the illegal web operators – and intercepts that do not require extensive work in the field. Moreover, governments that fail to undertake these investigations may soon find themselves inundated with Internet pharmacy operators who, like other international criminals, seek out the weakest regulatory and enforcement environment to proliferate their harm.