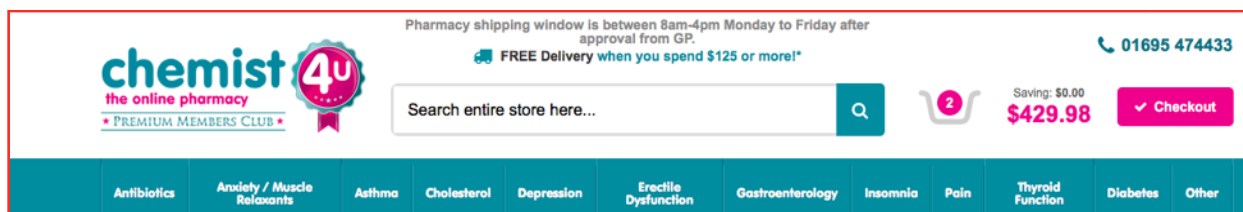


# TRANSACTION LAUNDERING AND THE EU COMMON LOGO FOR INTERNET PHARMACIES

How some internet pharmacies  
displaying the EU Common Logo, like  
[chemist-4-u.com](http://chemist-4-u.com), are gaming the system



## Introducing Chemist-4-U



This report outlines the operations of [chemist-4-u.com](http://www.chemist-4-u.com), an internet pharmacy registered with the UK [General Pharmaceutical Council](http://www.gpcc.org.uk) (GPhC) and approved by the [Medicines and Healthcare products Regulatory Agency](http://www.mhra.gov.uk) (MHRA) to sell medicines online. The UK government has awarded this pharmacy the right to display on its website the EU Common Logo, a recently implemented mechanism of assuring patients, payment providers (i.e., banks), and e-commerce companies, including Amazon and eBay, that an internet pharmacy is “operating legally”<sup>1</sup> and is therefore safe.<sup>2</sup>

But as outlined in this report, Chemist4U actually operates two separate internet pharmacies through its website. The internet pharmacy found at [www.chemist-4-u.com](http://www.chemist-4-u.com) (the “homepage”) is for the most part legally compliant. However, an invite-only, backdoor version is found at [premium.chemist-4-u.com](http://premium.chemist-4-u.com). Like the VIP room in a strip club, the pharmacy’s “Premium Members Club” accessible on this subdomain grants its members certain opportunities that are unavailable to everyday, walk-in customers. This includes the ability to buy controlled drugs (addictive medicines) including Xanax, Ambien, dihydrocodeine, and Klonopin — drugs unavailable on the seemingly legitimate homepage — without a valid prescription based on a prior in-person medical evaluation by the prescriber. Similarly, the pharmacy feigns legitimacy on its homepage by denying customers from outside of the UK, since it is not licensed elsewhere. But the Premium Members Club takes the opposite approach: it does not offer to ship to its own country, the UK, and restricts shipping to a number of countries outside of the UK, including the US.

<sup>1</sup> [http://ec.europa.eu/health/human-use/eu-logo/index\\_en.htm](http://ec.europa.eu/health/human-use/eu-logo/index_en.htm)

<sup>2</sup> UK pharmacy regulators require all pharmacies to register with the GPhC, and provides a voluntary website logo to prove that the pharmacy is operating legally. The EU Common Logo for internet pharmacies is a legal requirement, mandated by the Falsified Medicines Directive (2011/62/EU) issued in June 2014. The logo contains a hyperlink to the corresponding national regulatory authority where the internet pharmacy is registered.

Both versions of Chemist4U’s internet pharmacy display the government-authorized EU Common Logo verifying that it is “operating legally.” Both use the same merchant account to process customer payments, which presumably was granted to Chemist4U on the basis of its legitimate operations. However, the merchant account is being used to process payments for illegal controlled drug sales — a phenomenon called transaction laundering, in which a seemingly legitimate entity is a front that processes payments for an illicit one.



**Fig 1:** The EU Common Logo, which is intended to assure businesses and patients that an internet pharmacy is “operating legally.”



The problems with this are threefold.

First are the patient safety concerns: prescription drug abuse is a significant problem, “as drug overdose deaths have become the leading cause of injury death in the United States,”<sup>3</sup> with numerous documented deaths and overdoses in the UK and elsewhere.<sup>4</sup> The practice of selling addictive medicines on the internet without requiring a prior in-person examination is considered unlawful and unsafe nearly everywhere in the world.

The second problem is with the pharmacy’s use of the EU Common Logo, which assures customers, banks, and other platforms that the pharmacy is “operating legally.” As explained below, however, that promise falls short. Stated bluntly, if the EU Common Logo is going to offer this assurance to patients as well as payment providers and other intermediaries, then regulators must do a better job of ensuring that the online pharmacy really does operate legally where it serves customers. And, regulators should explain what went awry in this particular case.

The third problem is Chemist4U’s use of a classic move by rogue internet pharmacies: operate legally where the pharmacy is domiciled and registered, but target other countries with illegal drug sales. After all, what reason would a pharmacy registered and located in the UK have for serving customers everywhere except the UK? The reason is simple: being

<sup>3</sup> <https://www.dea.gov/docs/2015%20NDTA%20Report.pdf> (See p. iii.)

<sup>4</sup> See, e.g., <https://www.thesun.co.uk/archives/news/1149530/parents-warning-as-tragic-student-dies-from-overdose-of-anxiety-drugs-he-bought-on-the-internet/> and <http://www.dailymail.co.uk/news/article-1388795/Paramedic-Lorna-Lambden-died-overdosing-sleeping-tablets.html>.

physically located and registered in the UK, Chemist4U wants to reduce the risk of losing its license or facing law enforcement action, so it makes sure to only illegally sell controlled drugs to other countries. If someone outside of the UK overdoses or dies, Chemist4U can argue that the UK authorities have no jurisdiction to consider the matter. Conversely, Chemist4U may hope to argue that it is outside of the jurisdiction of the US Drug Enforcement Administration, Food and Drug Administration and their counterparts in other countries, and can therefore ignore those countries' laws and regulations, shipping controlled drugs without a valid prescription to customers in those countries with impunity. We believe, however, that the US Department of Justice, including its extradition branch, would likely beg to differ.



This report has three objectives. The first is to document the operations of Chemist4U's Premium Members Club, particularly in how it operates differently from the pharmacy's "legitimate" homepage in selling controlled drugs without a valid prescription. The second objective is to urge UK regulators to do more, and do better, in overseeing the country's internet pharmacies, including those that export unsafe medicines or engage in illegal behavior with respect to other countries, all the while hiding behind the UK government's imprimatur of approval. The third objective is to recommend that payment processors, e-commerce platforms, and other intermediaries understand that the display of the EU Common Logo, standing alone, is insufficient to ensure legality and ongoing compliance, despite the logo's own language promising internet users that the online pharmacy is operating legally.



## A Legitimate Front: The Chemist-4-U Homepage

The screenshot shows the homepage of Chemist-4-U. At the top, there's a navigation bar with links: Home, Prescriptions, Electronic Prescription Service, Delivery, FAQs, and Contact Us. On the right, there are flags for the UK, EU, and US, and a 'Login' button. Below the navigation bar, a banner states 'FREE Delivery when you spend £25 or more!'. The main header features the Chemist 4U logo, a search bar with the placeholder 'Search entire store here...', a shopping basket icon showing '0' items, and a 'Checkout' button. A secondary navigation bar lists various product categories: Pharmacy, Sexual Wellbeing, Embarrassing Conditions, Beauty, Vitamins, Dental, Prescriptions, Basket Fillers, C4U Online Doctor, When It's Gone, It's Gone!, and 99p Specials. The main content area includes a large promotional banner for 'TOP UP YOUR CART WITH OUR BASKET FILLERS AND GET FREE SHIPPING ON PURCHASES OF JUST £25', featuring an image of a woman and a basket full of products. To the right, there's a section for 'Electronic Prescription Service' with a 'Click here' button, and another banner for 'FREE SHIPPING ON ALL ORDERS OVER £25'. Below these, there are two text blocks: 'Chemist 4 U - Your Online Pharmacy and Online Chemist' and 'Finding the Right Chemist Online', both providing information about the pharmacy's services and commitment to customer satisfaction.

**Chemist 4 U - Your Online Pharmacy and Online Chemist**

Chemist 4 U is a popular UK online pharmacy that provides a broad range of treatments. Our aim is to meet and exceed all your expectations of an online chemist. In order to do this, we offer a huge choice on everything from vitamins, beauty, dental, sexual wellbeing, prescriptions, and much more. This way we are not only an online chemist, but also attempt to go the extra mile with a rich and varied product range.

When searching for a chemist online we know price is an important factor, which is why we provide competitive pricing across the board. Additionally, we have consistent promotions on our products and offer a sales/special offer section.

**Finding the Right Chemist Online**

We believe that one of the central advantages of visiting a pharmacy online is the prices which the high street simply cannot match. Through this, we ensure you know you're getting the best possible price when you come to us.

Another great advantage we are able to provide as an online pharmacy is confidentiality. Many people are uncomfortable with discussing their medical issues with a stranger. This is particularly true when discussing such ailments as sexual impotence or male pattern baldness. This is why we also provide the option of liaising with a doctor from the comfort of your own home, which is less embarrassing and more convenient.

Fig 2: The seemingly legitimate homepage of Chemist4U's homepage, which at first glance appears to comply with all applicable laws and regulations

Before exploring the Chemist4U's Premium Members Club, it's worth briefly walking through the pharmacy's seemingly legitimate homepage at [www.chemist-4-u.com](http://www.chemist-4-u.com). This is useful in highlighting the care that Chemist4U has taken to make sure it looks, on a surface level, like it is complying not only with UK laws, but also those of other countries, including the US.

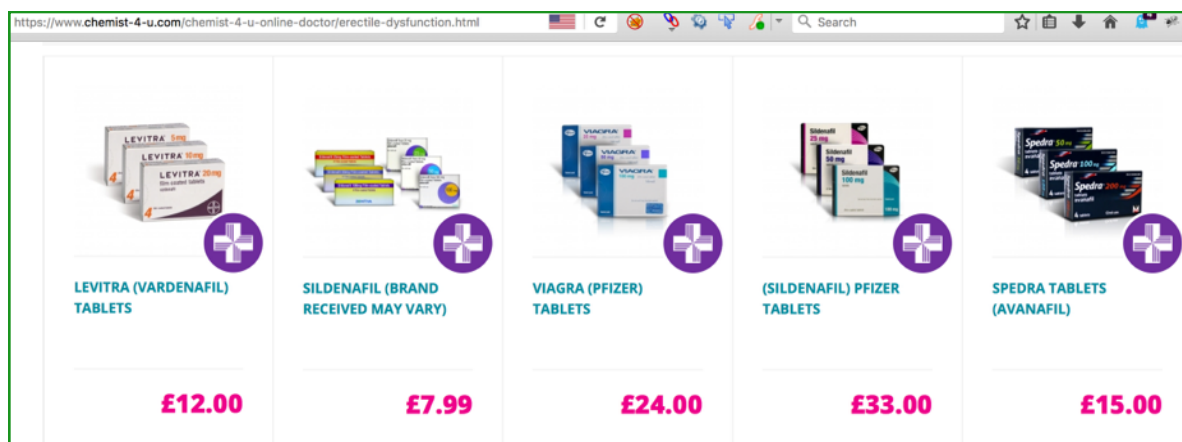
From its homepage, Chemist4U initially appears to follow regulatory requirements:

- As noted by the UK's GPhC, "Chemist-4-U," owned by Innex Trading, is a real, registered pharmacy. It displays the EU Common Logo demonstrating its legality.

| Trading name                            | Owner's name          | Current address   | Subject to notices or conditions? <sup>1</sup> | Internet Pharmacy Logo displayed <sup>2</sup>                | GPhC registration number <sup>3</sup> |
|---|-----------------------|---|--|--|---------------------------------------|
| Chemist-4-U Express Mail Order Pharmacy | Innox Trading Limited | 35-37 Greenhey Place, SKELMERSDALE, Lancashire, WN8 9SA, UK |  | <a href="http://www.chemist-4-u.com">www.chemist-4-u.com</a> | 1103628                               |

**Fig 3:** The GPhC pharmacy registration for Chemist-4-U Express Mail Order Pharmacy. Source: [pharmacyregulation.org](http://pharmacyregulation.org), the UK's official register of pharmacies. See <https://www.pharmacyregulation.org/registers/pharmacy/registrationnumber/1103628>.

- Chemist4U takes care not to list controlled drugs, and markets only a limited range of prescription drugs such as Levitra, Cialis, and Viagra (erectile dysfunction); doxycycline and Malarone (anti-malaria); various forms of female birth control; and Propecia (hair loss for men).

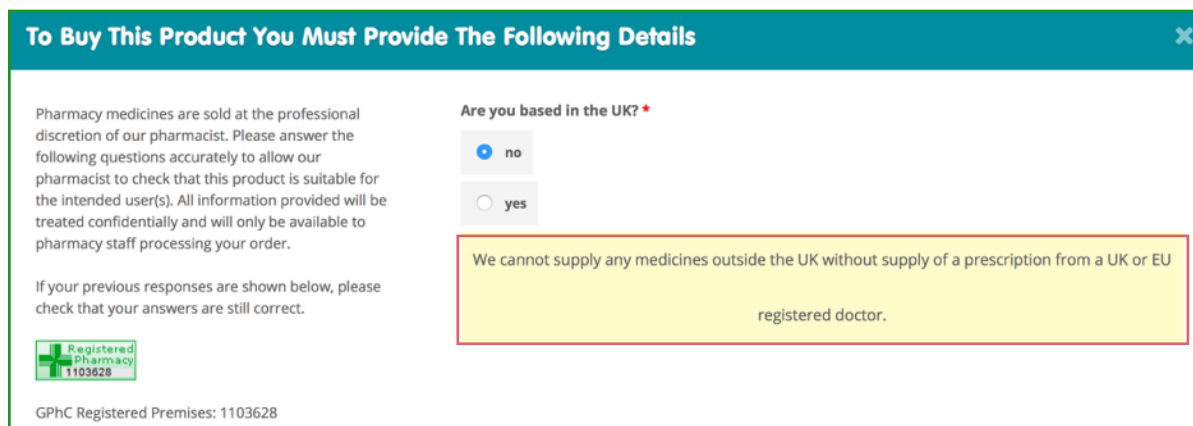


**Fig 4:** On its homepage, Chemist4U does list prescription drugs, but these are offered in compliance with UK laws and regulations and do not include controlled drugs.

- In general, the internet pharmacy's online consultation service, accessed from its homepage, is in compliance with the law.<sup>5</sup>
- Adding to its appearance of legality, even though based in the UK, Chemist4U's homepage takes additional steps to portray its operations as compliant with US and other

<sup>5</sup> Although visitors to [chemist-4-u.com](http://chemist-4-u.com) can simply fill out an online form to obtain a limited selection of prescription medicines without visiting a doctor first, the UK is one of the few jurisdictions that allows this consultation model.

laws, by refusing to accept orders if a customer indicates that he or she is outside of the United Kingdom.<sup>6</sup>



**To Buy This Product You Must Provide The Following Details**

Pharmacy medicines are sold at the professional discretion of our pharmacist. Please answer the following questions accurately to allow our pharmacist to check that this product is suitable for the intended user(s). All information provided will be treated confidentially and will only be available to pharmacy staff processing your order.


If your previous responses are shown below, please check that your answers are still correct.

**Are you based in the UK? \***

☒ no

☐ yes

We cannot supply any medicines outside the UK without supply of a prescription from a UK or EU registered doctor.

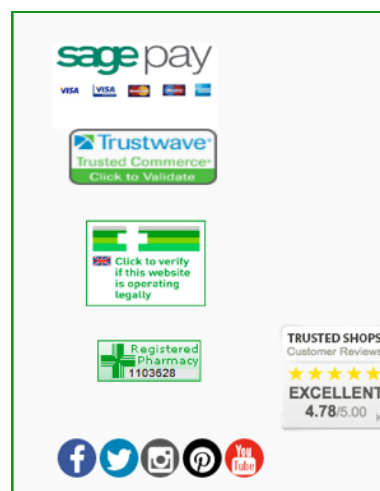
 GPhC Registered Premises: 1103628

**Fig 5: Chemist4U is not (to our knowledge) licensed in the United States or anywhere outside of the UK, and accordingly, is careful to note that only a UK or EU doctor can issue prescriptions for dispensing.**

- Finally, the homepage displays several seals attesting to the pharmacy's trustworthy nature: SagePay (a UK-based payment provider), Trustwave, the EU Common Logo, and the UK government's registered pharmacy seal, as well as a "Trustmark Award" offered by [trustedshops.co.uk](https://www.trustedshops.co.uk).

In other words, Chemist4U has taken care to ensure that it displays an image of legal compliance on its homepage.

**But what about Chemist4U's "Premium Members Club"?**



**Fig 6: Various seals of approval, including from the EU Common Logo and the UK government, attesting as to Chemist4U's website's legitimacy.**

<sup>6</sup> Most countries prohibit prescription drug importation. If one attempts to acquire Viagra, Propecia, or any other prescription medicine from this UK pharmacy, the first question presented is whether the patient is in the UK: if the answer is No, the customer cannot proceed, thus ensuring that the pharmacy does not illegally sell prescription drugs outside of the UK.

## The Chemist4U Premium Members Club

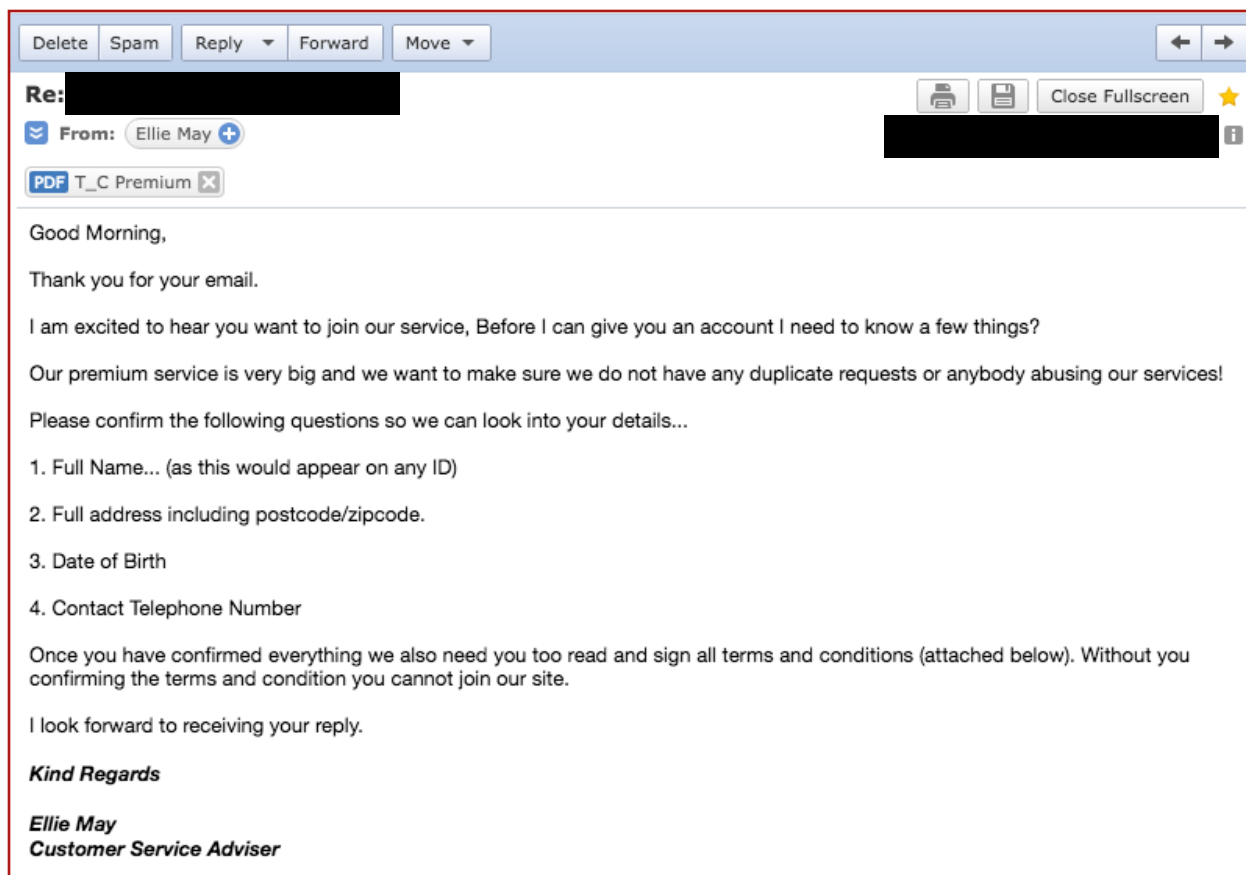
The screenshot shows the Chemist4U website's 'Anxiety / Muscle Relaxants' category. The header includes the Chemist4U logo, a search bar, and a shopping cart with a total of \$189.99. A navigation menu lists various medical conditions, with 'Anxiety / Muscle Relaxants' highlighted. Below the menu is a banner for 'ANXIETY' featuring a woman holding her head. A list of products is displayed, each with a green plus icon and a price tag. The products are: XANAX (ALPRAZOLAM) 0.25MG TABLETS X60 PFIZER (\$99.00), XANAX (ALPRAZOLAM) 0.5MG TABLETS PFIZER (\$99.99), PROPRANOLOL SR 80MG CAPSULES (\$99.99), DIAZEPAM (VALIUM) 5MG TABLETS (\$55.00), and DIAZEPAM (VALIUM) 2MG TABLETS (\$50.00). A 'Showing 9 results' and 'Sort By Position' dropdown are visible above the product list. A 'TRUSTED S' badge with a 4.78 rating is on the right.

| Product Name                                 | Price (From) |
|--|--------------|
| XANAX (ALPRAZOLAM) 0.25MG TABLETS X60 PFIZER | \$99.00      |
| XANAX (ALPRAZOLAM) 0.5MG TABLETS PFIZER      | \$99.99      |
| PROPRANOLOL SR 80MG CAPSULES                 | \$99.99      |
| DIAZEPAM (VALIUM) 5MG TABLETS                | \$55.00      |
| DIAZEPAM (VALIUM) 2MG TABLETS                | \$50.00      |

Fig 7: Chemist4U's "Premium Members Club," which offers Xanax, Valium, dihydrocodeine, and other controlled drugs. One need not see a doctor in person. Prices are listed by default in US dollars, not the British pound or the euro.

Access to Chemist4U's Premium Members Club is tightly controlled: an invite and approval are required. LegitScript, in an undercover capacity, sought access to the premium service, and received this welcome email (Fig 8).

























**Fig 8:** An email from "Ellie May" at Chemist4U's "Premium Members Club," which offers controlled substances without requiring a doctor's visit to residents of the US, UK, and other locations.

After providing the key information, including declaring a US address, we were approved and granted entry. Once inside, the Premium Members Club — unlike the pharmacy website's homepage — offers a wide range of controlled drugs. The images below are a partial list and composite sampling of the controlled drugs offered on Chemist4U's members-only page.



|  |   |   |  |   |
|--|---|---|--|---|
|  <p><b>DIHYDROCODEINE 30MG TABLETS</b></p> <p>From: <b>\$88.99</b></p>                            |  <p><b>DF118 (DIHYDROCODEINE) 40MG TABLETS</b></p> <p>From: <b>\$129.99</b></p>                      |  <p><b>CO-PROXAMOL TABLETS X100 M&amp;A</b></p> <p>From: <b>\$120.00</b></p>                         |  <p><b>DHC (DIHYDROCODEINE) 60MG TABLETS NAPP</b></p> <p>From: <b>\$99.00</b></p>        |  <p><b>DHC (DIHYDROCODEINE) 90MG TABLETS NAPP</b></p> <p>From: <b>\$120.00</b></p>           |
|  <p><b>DHC (DIHYDROCODEINE) 120MG TABLETS NAPP</b></p> <p>From: <b>\$160.00</b></p>               |  <p><b>CO-CODAMOL 30/500MG TABLETS</b></p> <p>From: <b>\$98.99</b></p>                               |  <p><b>SOLPADOL EFFERVESCENT TABLETS 30/500MG</b></p> <p>From: <b>\$144.99</b></p>                   |  <p><b>CO-DYDRAMOL 10/500MG TABLETS</b></p> <p>From: <b>\$98.99</b></p>                  |  <p><b>CODEINE PHOSPHATE 30MG TABLETS</b></p> <p>From: <b>\$59.99</b></p>                    |
|  <p><b>STILNOCT (ZOLPIDEM, AMBIEN) 10MG FILM COATED TABLETS</b></p> <p>From: <b>\$98.99</b></p> |  <p><b>ZOLPIDEM (AMBIEN, STILNOCT) 5MG FILM COATED TABLETS</b></p> <p>From: <b>\$59.99</b></p>     |  <p><b>ZOLPIDEM (AMBIEN, STILNOCT) 10MG TABLETS</b></p> <p>From: <b>\$60.00</b></p>                |  <p><b>CHLORAL HYDRATE 1G/5ML 500ML (WELLDORM)</b></p> <p>From: <b>\$729.99</b></p>    |  <p><b>PROVIGIL (MODAFINIL, ALERTEC, MODAVIGIL) 200MG</b></p> <p>From: <b>\$399.99</b></p> |
|  <p><b>PROVIGIL (MODAFINIL, ALERTEC, MODAVIGIL) 100MG</b></p> <p>From: <b>\$199.99</b></p>      |  <p><b>MODAFINIL (PROVIGIL) 200MG ANY UK LICENSE MANUFACTURER</b></p> <p>From: <b>\$199.99</b></p> |  <p><b>MODAFINIL (PROVIGIL) 100MG ANY UK LICENSE MANUFACTURER</b></p> <p>From: <b>\$149.99</b></p> |  <p><b>ZOPICLONE (ZIMOVANE, IMOVANE) 7.5MG TABLETS</b></p> <p>From: <b>\$59.99</b></p> |  <p><b>ZOPICLONE (ZIMOVANE, IMOVANE) 3.75MG TABLETS</b></p> <p>From: <b>\$49.99</b></p>    |

**Fig 9:** Unlike the pharmacy's homepage, Chemist4U's Premium Members Club offers Xanax, Valium, Ambien, Ativan, Alodorm, Klonopin, dihydrocodeine, and modafinil, among others.

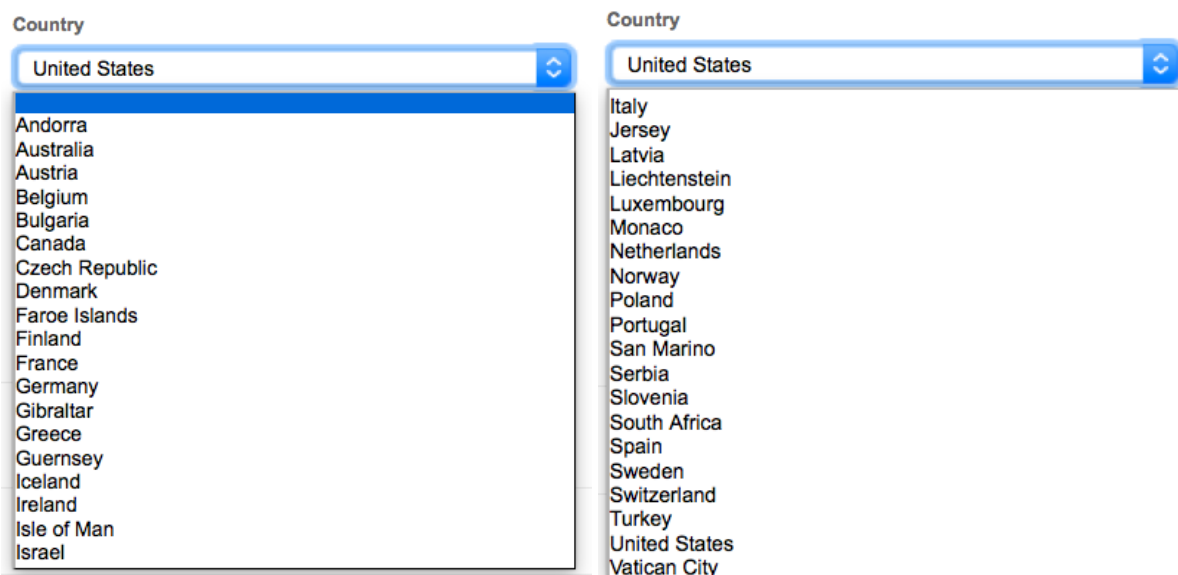
In a similar vein, the seemingly legitimate homepage offers a wide range of over-the-counter products such as shampoo, nail lacquer, and razor blades; prescription drugs are a relatively minor part of its offering. But the Premium Members Club appears to offer nothing but prescription drugs, with a heavy focus on controlled drugs.



Two other differences are critical to note. The first pertains to the differences where the legitimate homepage and the Premium Members Club offer to ship drugs.

When one accesses the seemingly legitimate homepage at [www.chemist-4-u.com](http://www.chemist-4-u.com), the website prevents users who are not physically located in the UK from obtaining prescription drugs — a good way of complying with licensure and drug safety laws around the world. (See Fig 5 above.)

However, the Premium Members Club is starkly different: when ordering a controlled drug, it is not just that the user can select multiple countries as the shipping destination. Rather, the UK is not available as a shipping option at all, as shown in Fig 10 below.



**Fig 10:** Unlike the pharmacy's homepage, Chemist4U's Premium Members Club will not even ship any drugs at all to the country where it is located and licensed, the UK. Rather, it merely exports controlled drugs to other countries, taking care to violate only the laws of other countries and not the UK's.

Similarly, when LegitScript accessed each version of Chemist4U's internet pharmacy, the default currency for the homepage was the euro, while the default currency in the Premium Members Club was the US dollar, suggesting that the controlled drugs are primarily intended for sale to US residents. Moreover, while the seemingly legitimate homepage offered free shipping for purchases of more than £25, the Premium Members Club offered free shipping only for orders of \$125 or more, again in US currency.

The second critical distinction pertains to differences in the online consultation processes. Although online consultations in lieu of an in-person physical exam are considered legitimate in only a fraction of jurisdictions around the world, in the jurisdictions that do permit them, a legitimate online consultation will be highly tailored to the medical condition in question, and questions will differ based on the prescription drug selected by the patient. Following this model, Chemist4U's legitimate homepage offers medical consultations that differ based on each medical condition. However, the Premium Members Club appears to offer an identical questionnaire for every drug, seeking the same information for a pain diagnosis as it does for anxiety, asthma, depression, and insomnia. When we attempted to purchase Cialis, for example, we were not asked about the quality of erections or other questions that are usually required to make an erectile dysfunction diagnosis.

All of this strongly suggests that Chemist4U's real purpose isn't treating patients, but simply selling drugs without regard for legality. And indeed, LegitScript was twice able to purchase prescription drugs without seeing a physician from Chemist4U's Premium Members Club, including, on one occasion, buying diazepam, a controlled drug, without a valid prescription.<sup>7</sup> (The prescription was issued by a Dr. F. Maassarani of Inspira Health GP, who never examined the individual who ordered the drugs in person. Dispensing controlled drugs without a prior in-person exam is a criminal offense in many jurisdictions, including the US, where these drugs were shipped.)

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<sup>7</sup> To ensure that we complied with the US Controlled Substances Act, LegitScript had the drugs shipped to a fictitious location, which resulted in the drugs being returned to the sender, and at no time did we actually take possession of the drugs.

Items Ordered | [Track your order](#)

| Product Name   | SKU      | Price   | Qty                      | Subtotal                              |
|--|----------|---------|--------------------------|---------------------------------------|
| DIAZEPAM (VALIUM) 2MG TABLETS  | [POM]244 | \$40.00 | Ordered: 1<br>Shipped: 1 | \$40.00                               |
| <div> <div>Manufacturer brands</div> <div>UK LICENSED</div> <div>Quantity</div> <div>x 28</div> <div>Dosage</div> <div>Take One Tablet Twice Daily (Please do not take with an ...</div> <div>Dosage</div> <div>Take One Tablet Twice Daily (Please do not take with any other benzodiazepine products)</div> </div> |          |         |                          |                                       |
|  |          |         |                          | Subtotal \$40.00                      |
|  |          |         |                          | Shipping & Handling \$15.00           |
|  |          |         |                          | <b>Grand Total (Excl.Tax) \$55.00</b> |
|  |          |         |                          | Tax \$0.00                            |
|  |          |         |                          | <b>Grand Total (Incl.Tax) \$55.00</b> |

**Figs 11-12:** The order confirmation of diazepam (Valium) from Chemist-4-U's Premium Members Club, and the "prescription" that a doctor wrote without a physical exam.

### Ordered Medicine

| Medicine Name                 | Quantity | Option | Dosage Instructions               |
|-------------------------------|----------|--------|-----------------------------------|
| Diazepam (Valium) 2mg Tablets | 1        |        | Instructions - Two tablets daily. |

**Doctors Name:** Dr F. Maassarani

Inspira Health GP  
 Spire Hospital  
 One Penny Lane  
 L18 1DG  
**GMC No.:** 4512981





## Conclusion

The website of the European Commission's Directorate for public health and risk assessment, [ec.europa.eu](http://ec.europa.eu), explains the purpose of the EU Common Logo: "(It) helps identify the websites which are operating legally. Buying from a legally operating pharmacy or retailer guarantees the safety of the products."<sup>8</sup>

The goal is a worthy one. But does it actually "identify websites operating legally?" In this case, No. If the EU is going to provide this assurance — that the presence of the logo guarantees legality — to payment providers, e-commerce platforms, other intermediaries, and (most critically) patients, it must follow through with a sufficient level of due diligence and ongoing monitoring using up-to-date cybercrime investigative tools, and ensure that the merchant is not engaged in transaction laundering. If it does not, the trustworthiness of the logo will be diluted by nefarious actors attempting to "borrow" the credibility of the logo.

EU regulators should also recognize that merely being registered as a pharmacy does not equate to operating legally. It's a necessary start, of course. But it's not enough. When prescription drugs, including controlled drugs, are sold on the internet without a valid prescription, they must, after all, come from somewhere. Sometimes, the drugs are fake and come from a filthy basement. Other times, they are real and come from a licensed pharmacy skirting the bounds of what is legal. Chemist4U, through its "Premium Members Club," falls into the latter category.

Chemist4U is but a single example — it unfortunately is not the only one — of a pharmacy displaying the EU Common Logo that flouts applicable laws or standards, including those in the US, where the drugs were shipped. Clearly, the pharmacy has a good sense of what's legal and what's not, since it takes great care to follow the rules on its homepage. But, it is unclear why a legitimate online pharmacy with nothing to hide would offer an invite-only portal with content hidden from the general public. LegitScript encourages regulatory authorities in the UK to review not just the operations of Chemist4U, but also their own protocols for authorizing registered pharmacies to display the EU Common Logo.

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<sup>8</sup> [http://ec.europa.eu/health/human-use/eu-logo/index\\_en.htm](http://ec.europa.eu/health/human-use/eu-logo/index_en.htm)