

**Before the House Committee on the Judiciary  
Subcommittee on Crime, Terrorism, and Homeland Security  
United States House of Representatives**

**Online Pharmacies And  
The Problem of Internet Drug Abuse**

**Statement of Christine N. Jones  
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## **Introduction**

Good morning Mr. Chairman and Members of the Committee. I am Christine Jones, General Counsel and Corporate Secretary of The Go Daddy Group, Inc.

First, I would like to thank you, Chairman Scott, for the kind invitation to testify today regarding online pharmacies and the problem of drug abuse on the Internet. We are grateful for this Committee's attention to this important issue and for recognizing that the problem of online drug sales generally, and illegal sales to minors specifically, is a growing and unacceptable problem that must end. The purpose of this testimony is to describe the scope of the problem we all face and how Go Daddy responds to these challenges. Go Daddy is committed to taking whatever steps are necessary and feasible to assist in ending this practice, and we would challenge our counterparts on the Internet to make the same commitment.

## **Background**

The Go Daddy Group, Inc. consists of eight ICANN Accredited registrars, including GoDaddy.com. When I joined Go Daddy in early 2002, it was a very small registrar with well under 100 employees. Today, we have thirty million domain names under management, and are the number one registrar in the world. That means we register a domain name once every second or less. Go Daddy is also a large hosting provider. We currently employ over 2,000 people and do not utilize offshore outsourcing of any kind.

A domain name registrar serves as the point of entry to the Internet. If, for example, you wanted to register the domain name [www.ChairmanScott.com](http://www.ChairmanScott.com), you could go to [www.GoDaddy.com](http://www.GoDaddy.com) to register that domain name. A domain name registrar is different from a traditional Internet Service Provider (ISP), such as AOL, MSN, or EarthLink, in that the ISP provides access to the Internet whereas the registrar provides the registration service for .com names and the like.

Once the domain name [www.ChairmanScott.com](http://www.ChairmanScott.com) is registered, you would need to build a website and find a place to store, or "host," that website. Again, you could go to

[www.GoDaddy.com](http://www.GoDaddy.com) for storage, or hosting, services. A hosting provider differs from a traditional ISP in that the hosting provider supplies space on a computer that is accessible from the Internet rather than access to a computer which is provided by the ISP.

### **How Go Daddy Deals With Online Pharmacies**

The Go Daddy Group devotes considerable time and resources to working with law enforcement on preserving the integrity and safety of the Internet by quickly closing down websites and domain names engaged in illegal activities. We work with law enforcement agencies at all levels and routinely assist in a wide variety of criminal and civil investigations. We are also quick to respond to complaints of spam, phishing, pharming, and online fraud and work closely with anti-fraud and security groups such as the Anti-Phishing Working Group, Digital Phish Net, the National Center for Missing and Exploited Children, and CyberTipLine. I personally, and the company in general, have made it a high priority to use our position as a registrar to make the Internet a better and safer place.

We routinely investigate sites involving online drug sales. They come in many forms and degrees of severity. These include, but are not limited to, the following: 1) sites with invalid contact data for the operators; 2) sites depicting counterfeit or copycat drugs purporting to be drugs produced by the major pharmaceutical companies; 3) sites selling advertising, advocating, or promoting use of drugs by minors; and, 4) sites which admit to filling orders without a prescription. Our investigations have further uncovered sites containing offers to provide Level I controlled substances via a prescription provided by a “doctor” employed by the website operator. These sites typically do not verify age, medical history, or medical necessity. The result is that any 14 year old can go on the Internet and have a supply of recreational drugs sent to their home via overnight courier with no questions asked. We take each instance seriously and devote high priority attention to ensuring full cooperation with law enforcement in their attempts to remove such websites from our network, as described in more detail below.

### *The Domain Name Registration Process*

The domain name registration system is entirely automated. There is no human intervention into the process. Because many words have multiple meanings and combinations of words can be used for both legitimate and illegitimate purposes, no domain names are automatically prohibited from registration. As mentioned above, Go Daddy registers a domain name once every second or less. This makes it virtually impossible for a human to verify the legitimate use of every domain name registration, particularly on an ongoing basis. Thus, we have developed a notification system for reporting instances of all types of network abuse, including online pharmacies, to our Network Abuse Department.

### *The Notification Process*

With nearly 30 million domain names under management, we must rely on information from third party complaints or notices. The Go Daddy Network Abuse Department receives information that an online pharmacy site may be residing on our network in several ways: 1) a direct complaint from a third party via email; 2) a direct complaint via telephone; 3) a tip from employees who have become aware of drug sales on a customer site; and, 4) a notification from law enforcement and other "watchdog" groups.

### *The Investigation Process*

Within the first six months of 2008, we received thousands of complaints on sites that were related to pharmaceuticals. These included sites with invalid contact data, legal disputes by legitimate drug producers, trademark disputes, spam, phishing, and of course, criminal investigations.

The most common situation we see is "pill spam," or email advertising the sale of prescription drugs. The most common pill spam situation is spam email being sent to Go Daddy customers or our customers' customers. Our email team estimates that our extremely effective spam filters block more than an estimated 2,400 separate spam attacks every day, many of which are related to selling drugs online.

### *The Results*

Despite our spam filters, our Network Abuse Department still receives between 30 and 50 pharmacy related spam emails every day, with the majority of them hitting on Friday nights. This is a new permutation of an old spam and phishing trick designed to lengthen the amount of time a site that is likely fraudulent or abusive would remain online. The theory is that the ISP providing the service may have gone home for the weekend.

Of the 30 to 50 pill spam emails we receive every day, over 95% of the pharmacy sites mentioned in the spam emails do not have services with Go Daddy. This may well indicate that many pill spammers tend to favor other registrars or hosting providers who are not as active in combating abuse as Go Daddy is, or who are known to have slower response times in dealing with abuse issues. It also tends to show that other registrars could do more to combat this growing problem.

To put the remaining 5% in some perspective, those sites where Go Daddy does provide services, our Abuse Department suspended over 1,300 domain names in 2007 that were involved in online drug sales. In other words, in one year, we disabled more than 1,300 separate websites where drugs were available for purchase, mostly without a prescription, and almost always without any age verification or parental oversight required. We believe this statistic shows how easy it is for Internet users who are also drug users to get drugs, some of them dangerous Schedule I drugs, with no verification that the online pharmacy or its customer has any legal business in the drug transaction. This should concern all of us.

For 2008, the trends are much more severe. Go Daddy has suspended over 6,000 online pharmacy domain names so far in the first two quarters of 2008 alone. That is six thousand in six months! This huge increase provides one of the main reasons Go Daddy has been so vocal and active in bringing attention to this issue. Drugs are too easy to buy online. This is about more than just people trying to save money on prescription drugs by unknowingly buying counterfeit brand name pills. This is about young kids who use

their parents' credit card, tell them they are buying music or video games, and instead are able to stock the weekly party with enough ecstasy for them and all their young friends. This is very, very serious.

#### *What the data means*

Based on our data, it appears that illegitimate pharmacy sites, just like phishing and spam sites, are likely primarily operated by a relatively small core of offenders who do so on a large scale and organized basis. When we took action on some of these larger offenders, effectively stopping their use of Go Daddy products and services, we saw an immediate and sustainable reduction in pharmacy site abuse here at Go Daddy. The numbers of pharmacy sites we are seeing advertised in spam, however, has continued to increase. So, it would be very helpful to have cooperation from our peers in the industry to fight this issue.

The good news about having a small core of offenders responsible for most of the problems is that if you can get to them and stop them, you see large benefits. The bad news is that any one company's actions to combat this, regardless of how much it may help our specific situation, will not stop the problem. It will only cause the problem to shift to another provider. Effective legislation in this area may help overcome this problem. If we can either convince the illegitimate pharmacy sites that it is not going to be in their best interest to continue the same practices, or if we can start to standardize the levels and types of responses from providers, we should see overall success for the Internet much like we have seen within Go Daddy.

#### **How Go Daddy Deals With Private Domain Name Registrations**

Go Daddy offers privacy services for domain name registrations. A private domain name registration is recorded through a proxy registrant, thus enabling a domain name registrant to avoid publication of their personal information in the public WHOIS data base. We find that most of the users of the private registration service are legitimate users; bad actors typically do not want to pay extra to hide their WHOIS data when they are probably going to provide false WHOIS data, anyway. Most online pharmacies do

not have privacy protection on them. More often than not, the registrant simply provides false, but typically valid looking, WHOIS data, upon registration.

The registration process for a domain name is exactly the same regardless of whether the customer chooses to enable privacy. While we do not have different rules for registering a domain name with privacy, we do use our terms of service broadly to cancel privacy when it is being used for ANY improper purpose. We also give law enforcement the proxy registrant information on private domain name registrations when they are investigating a domain name with privacy. In the case of online pharmacy sites, this information is voluntarily provided to law enforcement during the notification process described above.

### **Conclusion**

Thank you again, Mr. Chairman, for the opportunity to be heard on these important issues. Your commitment and the commitment of the Members of this Committee, to bringing attention to this troubling problem is sincerely appreciated. Go Daddy is committed to working with law enforcement and others in the industry to remove illegitimate online pharmacies from the Internet. I would be happy to answer any questions you may have.