

August 21, 2019

Advisory to Digital Private Sector Platforms on Illicit Activity and Methods Related to the Marketing of Fentanyl and Synthetic Opioids

Criminal actors leverage digital platforms—social media applications and websites, communications applications, e-commerce platforms, and other private sector entities—to engage in the marketing of fentanyl, fentanyl analogues, and other synthetic opioids.

This advisory should be shared with social media companies, communications applications companies, e-commerce platforms, forum-based platforms, chemical supply companies, and pharmaceutical supply companies.

Introduction

The opioid crisis is a serious epidemic that requires a multidisciplinary approach including aggressive investigation and prosecution, in addition to collaboration with private sector partners in the fields of technology, health care, prevention, treatment, and education. Federal, state, local, tribal, and territorial partners must work together with the private sector to leverage collective resources in the fight against this deadly threat. The private sector can play a key role in combating the opioid crisis by working with law enforcement to identify the ways in which criminals are exploiting legal platforms for illicit means and referring criminal activity to law enforcement for investigations.

This advisory¹ for our digital private sector partners raises awareness about the marketing and sale of illicit fentanyl via digital private sector platforms, including social media, e-commerce websites, and online forums. This advisory applies to fentanyl and all illicit synthetic opioids. This advisory provides private sector partners with information to identify illicit fentanyl marketing on their platforms, refer this activity to law enforcement partners when identified, and interrupt trafficker use of their platforms to advertise and sell illicit fentanyl. Public-private partnership will assist in the disruption of the deadly illicit fentanyl trade.

Illicit drugs have been and still are customarily purchased through interpersonal connections or on the street, but as technology advances, criminals are exploring new methods of

¹ This advisory is also part of a larger, United States government Fentanyl advisory covering the movement, manufacturing, marketing, and monetary aspects of the trafficking of fentanyl and other synthetic opioids.

marketing illicit goods to their customers. Today, fentanyl,² fentanyl analogues,³ and other synthetic opioids are marketed to consumers in several ways, most notably via online platforms like social media and special interest online forums. These marketing innovations have allowed criminal groups to reach a broader audience, including those drug users who would not be comfortable purchasing drugs on the street but are comfortable searching for them online from the safety of their own homes. As criminal groups’ priorities change based largely on the drugs they are selling, their methodologies evolve to exploit Internet⁴ capabilities, allowing drug dealers to obfuscate their identities and reduce their personal risk when selling illicit substances.

Customers seeking to buy synthetic opioids can readily find them on the Darknet and Clearnet. Some Darknet marketplaces exist primarily to sell drugs, and the illicit substances available on those marketplaces vary greatly, ranging from diverted pharmaceutical products to illicit drugs with no legitimate medical purpose. Some Clearnet e-commerce websites also openly advertise and sell synthetic opioids and the chemicals or equipment used to make or process them; these websites are generally hosted outside of the United States but advertise their illicit products globally.

Criminals also use U.S.- and foreign-based Clearnet websites and platforms (social media platforms, e-commerce websites, mobile applications (“apps”), online forums, etc.) to market and sell illicit drugs and processing equipment, and to provide information on how to access illicit goods, often without the knowledge or consent of the owners and operators of the websites. Customers may search Clearnet websites by using hashtags or code words to find illicit goods. Marketing through Clearnet websites and platforms allow drug traffickers to reach a broader customer base and facilitate consumer access to illicit drugs.

Typologies

Use of the Internet to market synthetic opioids and the equipment needed to prepare these drugs for redistribution presents multiple new challenges for traditional law enforcement

² Note that under U.S. federal law, fentanyl is a Schedule II controlled substance, which is lawfully produced and distributed in the United States by manufacturers of prescription drugs approved by the Food and Drug Administration (FDA) and is widely used in medicine. This advisory focuses mainly on the illicit manufacturing, importation, and/or distribution of illegal fentanyl and other synthetic opioids.

³ While fentanyl analogues have a chemical structure similar to that of fentanyl, small structural modifications result in a seemingly endless number of variations of the parent drug with similar effects and of unknown potency.

⁴ The Internet is typically separated into three distinct parts: (i) the open Internet, also known as the Clearnet, which encompasses sites publicly accessible through search engines such as Google; (ii) the Deep Web, which consists of content not indexed and sites that cannot be found by normal search functions, such as paywall-protected pages; and (iii) the Darknet, which consists of many networks, and refer to areas of the Internet accessible only via specialized anonymizing software, such as the Tor network. (Sites only reachable through the Tor network are recognizable through their “.onion” URL domain suffix.) While Darknet content is varied, it is also home to hidden services such as criminal marketplaces that allow individuals to buy and sell illegal items, such as drugs, firearms, and other hazardous materials, with greater anonymity than is possible on the traditional Internet. Generally, these Darknet market websites use a variety of anonymizing and encryption technologies in an attempt to shield communications and transactions from interception and monitoring.

techniques. The predominant U.S.- and foreign-based fentanyl marketing platforms include: (i) U.S.-based Clearnet websites and platforms; (ii) Darknet marketplaces; and (iii) Foreign-based Clearnet websites. Moreover, the Internet facilitates the marketing of equipment necessary to prepare these drugs for redistribution to individuals for use and sale: (iv) Sales of pill presses and pill press parts.

U.S.-Based Clearnet Websites and Platforms

Fentanyl and other synthetic opioids are marketed on social media platforms, e-commerce websites, mobile apps, and online forums. Law enforcement successes have prompted vendors to market fentanyl and other synthetic opioids with coded language. Instead of advertising “fentanyl” or “fent”, criminals now advertise “roxies”, “pressed pills”, “blues”, or other slang names for synthetic opioids. Criminals may also advertise Darknet marketplace .onion⁵ URLs or links to foreign-based e-commerce websites that sell synthetic opioids on Clearnet platforms, along with step-by-step guides explaining how to access these websites and obtain the virtual currency needed to make purchases on Darknet marketplaces.

Darknet Marketplaces

Darknet marketplaces offer criminal buyers and sellers multiple advantages over street drug sales. Illicit buyers can mask their identities and geographic locations by using the Tor network, employing encrypted communications and purchasing goods and services with virtual currency that may enhance their anonymity, without having to leave their homes. Darknet marketplaces also offer buyers a greater variety and quantity of illicit drugs. Criminal actors find these platforms attractive because they have access to a larger customer base. Many Darknet marketplaces are readily accessible to anyone with the correct .onion URL. These marketplaces, and the websites that customers can use to find them, usually include guides on how to purchase illicit goods, such as synthetic opioids, on their platforms. Darknet marketplaces often have their own forums on which customers can read about different drugs, vendors’ reputations, products, or operational security and how to use certain virtual currencies to obfuscate their activities. Vendors advertise their products—including illicitly-produced synthetic opioids, counterfeit pharmaceutical opioids, and legitimate but diverted pharmaceutical opioids—with pictures and detailed descriptions of their products, often highlighting their operational security, commitment to customer service, and reliability in delivery.⁶ Vendors ship drugs to their customers using the postal service and consignment shippers.

Foreign-based Clearnet Websites

⁵ “.onion” is a top level domain suffix akin to “.com” or “.gov”. Websites with .onion suffixes are only accessible via the Tor network, which masks the identity of users, thereby anonymizing Internet traffic.

⁶ Diverted, licitly-produced synthetic opioids comprise a very small percentage of the illicit supply of synthetic opioids.

Websites designed specifically to market synthetic opioids to customers also operate on the Clearnet. For example, suppliers in China and elsewhere may advertise themselves as Chinese pharmaceutical companies or chemical research companies and advertise fentanyl, fentanyl analogues, and other synthetic drugs (including the opioid U-47700, synthetic cannabinoids, synthetic cathinones, and steroids). These suppliers market their products over the Clearnet on business-to-business (B2B) company websites that generally appear legitimate, and have user interface features similar to legitimate e-commerce websites. Illicit fentanyl sold on Clearnet websites and platforms is largely in powder form, sourced directly from foreign criminal networks advertising themselves as pharmaceutical companies or research chemical companies, and purchased by individuals for personal use, for redistribution in their own networks, and for resale on Darknet marketplaces. On these websites, fentanyl and other synthetic opioids can be purchased with Bitcoin or more traditionally-accepted payment methods.

Sales of Pill Presses and Pill Press Parts^{7,8}

Pill presses, also called tableting machines, and their components—including dies, punches, or stamps used to shape and imprint tablets—are also advertised and sold on Internet forums such as social networking groups, online forums, and encrypted messaging app groups, as well as on Clearnet websites and platforms. Criminals use these machines to press powdered fentanyl, along with mixing and binding agents and other illicit drugs, into small tablets or capsules, which are then sold online or to street users. Pill presses range in size from a small plastic tabletop press to one larger than a refrigerator, with prices running from \$100 to \$12,000. Larger pill presses can generate substantial volumes, with one model creating millions of pills per hour. Traffickers use the dies to imprint on a tablet a unique shape—such as a heart or a diamond—for branding purposes. Other dies imprint text or numbers to produce counterfeit versions of legitimate pharmaceutical trademarks. Traffickers exploit the trademarks and copyrights of pharmaceutical companies to access the broader market of individuals who are more comfortable purchasing what they believe to be licitly-produced, diverted synthetic opioids as opposed to raw powders or nondescript tablets that are manufactured outside of the highly regulated and safety-focused legitimate supply chain. These counterfeit pills can mimic the effect of pharmaceutical opioids and are sold both online and on the street to addicts as a replacement when they are no longer able to illegally obtain or afford FDA-approved prescription opioids.

⁷ For additional details on the use of pill presses for manufacturing illicit synthetic opioids, refer to the *21st Century Drug Trafficking: “Manufacturing Advisory” on Fentanyl and Other Synthetic Opioids (Tab A)*, which is a part of a larger, United States government Fentanyl advisory covering the movement, manufacturing, marketing, and monetary aspects of the trafficking of fentanyl and other synthetic opioids.

⁸ *Pill press* is the commonly used name for tableting machines. Tableting machines are any manual, semi-automatic, or fully automatic equipment which may be used for the compaction or molding of powdered or granular solids, or semi-solid material, to produce coherent solid tablets. These machines come either as hand-held (manual), desktop, or floor model (manual or electric). The machines produce tablets at a rate of several tablets per hour with a manual hand-held machine to the electronic floor model that can produce millions of dosages per hour.

The Drug Enforcement Administration (DEA) regulates pill presses and tableting machines and their components, and it is illegal to possess or sell these machines if there is reasonable cause to believe that they will be used to illicitly manufacture or process a controlled substance. The sale or distribution of punch dies or stamps representing a registered trademark or copyright, used to manufacture counterfeit drugs, is a criminal offense investigated by the FBI, Food and Drug Administration (FDA) and U.S. Immigration and Customs Enforcement–Homeland Security Investigations (ICE/HSI).

Case Studies

Numerous law enforcement agencies collaborate with each other and private sector partners to target drug traffickers exploiting online platforms. The Joint Criminal Opioid and Darknet Enforcement (JCODE) team, created in January 2018, leads these targeting efforts against the trafficking of fentanyl and other synthetic opioids on both the Darknet and Clearnet. The JCODE team, sponsored by the U.S. Department of Justice (DOJ), includes representatives from DEA, ICE/HSI, the FBI, U.S. Postal Inspection Service (USPIS), Department of Defense (DOD), Customs and Border Protection (CBP), Financial Crimes Enforcement Network (FinCEN), and U.S. Immigrations and Customs Enforcement/Homeland Security Investigations (ICE/HSI), and works jointly with state and local task force officers. Building on the successful Silk Road (2013) and AlphaBay (2017) investigations, the JCODE team’s agents, analysts, and professional staff with expertise in transnational organized crime, virtual currency, money laundering, cyber-enabled crime, drugs, gangs, and health-care fraud work to disrupt the sale of drugs via hi-tech platforms and dismantle criminal enterprises that facilitate this trafficking.

Example of Clearnet and Darknet Information Sharing Facilitating Fentanyl Trafficking

A popular social network website provides a recent example of how illicit actors exploited a private sector business platform to market and sell drugs. This social network website allows users with shared interests to create forums dedicated to a specific topic. These topics range from innocuous themes (e.g., cat gifs, weight lifting, and gardening) to illicit topics. Darknet actors have long used forums related to the sale and purchase of illicit drugs, targeted toward new users to the Darknet. These forums have served to provide information, including instructions for downloading the Tor browser and accessing Darknet marketplaces, advice on how to look for specific types of drugs or vendors, and reviews of products and vendors. Vendors and buyers often use forums to warn other users of scams, post how-to guides promoting “operational security” on marketplaces, and teach Darknet users how to use different marketplaces and virtual currencies. Vendors attempting to sell illicit goods used forums to start “threads” advertising their offerings, which directed potential customers to their Darknet marketplaces. In the spring of 2018, the social network website banned threads

specifically related to Darknet marketplaces in an effort to curb the illicit activity the network was inadvertently facilitating.

Other licit private sector platforms are also vulnerable to exploitation by criminal actors. Platforms that offer features such as encrypted channels; closed social networking groups or closed “friend groups”; forum threads; members-only chains; or private messaging, along with those that allow for users to search by hashtags or code names, are particularly vulnerable to exploitation.

Refer to the reporting instructions later in this advisory for the specific ways suspected criminal activity can be reported to law enforcement.

Example of Darknet Vendor Selling Fentanyl Analogues Purchased with Virtual Currency

In March 2019, a JCODE investigation led to the arrests of an alleged Darknet vendor and his co-conspirator in New York. One defendant allegedly operated a Darknet marketplace moniker with 3,200 transactions and distributed carfentanil, fentanyl, and an analogue of fentanyl, while the other defendant allegedly shipped the narcotics via the USPS. One of the defendants allegedly laundered narcotics proceeds by funneling more than \$1.77 million through Bitcoin wallets and by purchasing foreign currency, among other valuables, which were shipped to the defendant’s residence.⁹

Example of Large Scale Darknet Marketplace


Most recently, in March 2019, the JCODE team announced the results of Operation SaboTor, a coordinated international effort from January and March 2019 targeting drug trafficking organizations operating on the Darknet. As a result of Operation SaboTor, U.S. and international law enforcement agencies made 61 arrests and shut down 50 Darknet accounts allegedly used for illegal activity. Law enforcement executed 65 search warrants, seizing 299.5 kilograms of drugs, 51 firearms, and more than \$7 million (\$4.5 million in virtual currency, \$2.48 million in cash, and \$40,000 in gold). Law enforcement officers also conducted 122 interviews aimed at gathering intelligence about new Darknet marketplaces and vendors and engaged in public education efforts regarding the dangers of opioid abuse during the operation. This was a collaborative effort across the JCODE entities, including the FBI, DEA, ICE/HSI, CBP, USPIS, DOJ, and DOD, with participation from international partners during the Cyber Patrol Action Week at Europol. By leveraging partnerships and surging resources across the U.S. government and Europol, Operation SaboTor successfully disrupted the most prolific opioid vendors on the Darknet and dismantled the criminal enterprises

⁹ See DOJ Office of Public Affairs, For Immediate Release: [Prolific Dark Web Dealer Of Carfentanil And Fentanyl Arrested](#), March 12, 2019.

facilitating their opioid trafficking. All of those individuals charged are pending judicial outcome.¹⁰

Red Flags


These red flags are intended to inform the operators of digital private sector platforms of signs that fentanyl traffickers may be exploiting their platforms to promote and facilitate the sale of illicit drugs. Should private sector businesses encounter any of these red flags, law enforcement agencies request that they preserve and document the activity thoroughly and refer it to law enforcement for investigation and potential prosecution immediately. Red flags that could indicate a social media platform, e-commerce website, mobile app, or online forum is being exploited to market synthetic opioids include:

 1. Names or .onion URLs of popular Darknet marketplaces:

- Empire
- Tochka/Point
- Rapture
- Berlusconi
- .onion

 2. The names of synthetic opioids often sold online:

- Acetyl fentanyl
- Butyr fentanyl
- Carfentanil
- FUF Fentanyl HCL
- Furanyl fentanyl
- Isobutyr fentanyl
- Lofentanil
- 4'-methyl Acetyl fentanyl HCL
- Valeryl fentanyl

 3. Key words that may indicate the advertising of fentanyl and other opioids¹¹:

- 30s
- Blues
- Dragon's Breath
- Fent
- Fentanyl
- Fenty
- M-30s
- Mister Blue
- Oxy
- Oxycodone
- Oxymorphone
- Percocet
- Percs
- Perks
- Pressed Pills
- Roxicodone
- Roxies
- Suboxone
- Tabs
- Tramadol
- U4
- U4700
- U4800

¹⁰ See FBI Press Release: [J-CODE Announces 61 Arrests in its Second Coordinated Law Enforcement Operation Targeting Opioid Trafficking on the Darknet](#), March 26, 2019.

¹¹ Additional slang words for fentanyl and other opioids can be found in the DEA Intelligence Report on [Drug Slang Code Words](#), May 1, 2017.

- Watson
- White
- Xanax

4. The use of a hashtag in conjunction with a synthetic opioid or drug, appearing as an advertisement on a social media platform or website. For example:

- #30mgoxy
- #OxyContin
- #Oxycodone
- #Roxicodone

5. Fentanyl precursor chemicals:

- N-phenethyl-4-piperidone (NPP)
- 4-anilino-N-phenethyl-4-piperidine (ANPP)

6. Key words related to pill presses and parts used to produce counterfeit fentanyl-containing pills:

- Pill press
- Tableting machine
- Punch die
- Die
- Stamp
- Punch
- Crimping & Tablet Press machine
- Manuel tableting
- Hand-operated pill press
- Rolling mill
- Tablets
- Encapsulating machine
- Pill making machine
- M/30 die/M/30 stamp
- A/215 die/A/215 stamp

Reminder of Regulatory Obligations

The Ryan Haight Online Pharmacy Consumer Protection Act of 2008 (21 U.S.C. 829 – Prescriptions): DEA enforces this law regulating online Internet prescriptions and Internet pharmacies. The Act prohibits the delivery, distribution, or dispensing of a controlled substance that is a prescription drug over the Internet without a valid prescription. Further information about this Act can be found here:

<https://www.deadiversion.usdoj.gov/21cfr/cfr/2106cfrt.htm>

The United States Federal Food, Drug, and Cosmetic Act (FDCA) prohibits doing and causing the following acts:

- The introduction into interstate commerce of any drug that is “misbranded”. See 21 U.S.C. § 331(a).
 - A drug may be deemed “misbranded” under the FDCA for numerous reasons, including if its labeling is false or misleading or if it is an imitation of another drug. See 21 U.S.C. § 352(a) and (i)(2).
- The receipt in interstate commerce of any drug that is misbranded and the delivery or proffered delivery of such drug for pay or otherwise. See 21 U.S.C. § 331(c).
- The introduction into interstate commerce of a new drug that has not been approved by the FDA. See 21 U.S.C. § 331(d).
- The doing of any act that causes a drug to be a counterfeit drug, or the sale or dispensing, or the holding for sale or dispensing, of a counterfeit drug. See 21 U.S.C. § 331(i)(3).

The following are also regulatory obligations under United States Code:

- 18 U.S.C. § 545 makes it illegal to fraudulently or knowingly import or bring into the United States any article “contrary to law.”
- 18 U.S.C. §§ 1956 and 1957 prohibit the laundering of money derived from specified unlawful activities, including smuggling and violations of the Controlled Substances Act.

Requirements for the importation, exportation, or distribution of tableting and encapsulating machines can be found in the Code of Federal Regulations:

- 21 CFR 1300.02(b) defines an encapsulating machine as “Any manual, semi-automatic, or fully automatic equipment which may be used to fill shells or capsules with any powdered, granular, semi-solid, or liquid material”.
- 21 CFR 1300.02(b) defines a tableting machine as “any manual, semi-automatic, or fully automatic equipment which may be used for the compaction or molding of powdered or granular solids, or semi-solid material, to produce coherent solid tablets.”
- 21 CFR 1310.03(a) states that “each regulated person who engages in a regulated transaction involving a listed chemical, a tableting machine, or an encapsulating

machine shall keep a record of the transaction as specified by 21 CFR 1310.04 and file reports as specified by 21 CFR 1310.05.”

- 21 CFR 1310.04(a) states that “every record required to be kept subject to 21 CFR 1310.03 for a List I chemical, a tableting machine, or an encapsulating machine shall be kept by the regulated person for 2 years after the date of transaction.”
- 21 CFR 1310.05 describes the reporting requirements for listed chemicals, tableting machines, and encapsulating machines.
- 21 CFR 1310.06 describes the content requirements for records and reports regarding listed chemicals, tableting machines, and encapsulating machines.
- 21 CFR 1310.07 describes the proof of identity that regulated persons must obtain from the other party when engaging in a regulated transaction.

Reporting Instructions

If you suspect that an online account or platform is being used to facilitate sales of illicit fentanyl, opioids, counterfeit pharmaceuticals, or other controlled substances, please preserve all associated information, and document associated accounts and activity thoroughly so that it can be reported to the following agencies:

Federal Bureau of Investigation: Please refer relevant information about the production, processing, trafficking, or distribution of illicit goods and services, including fentanyl, to the FBI field office (<https://www.fbi.gov/contact-us/field-offices>) or embassy representative (<https://www.fbi.gov/contact-us/legal-attache-offices>) nearest you, 24 hours a day, seven days a week, or report suspected crimes through the FBI tip line at: <https://www.fbi.gov/tips>

Drug Enforcement Administration: Please refer relevant information to the nearest DEA field office or through the DEA tip line at <https://www.dea.gov/submit-tip>

Homeland Security Investigations: Individuals across the world can report suspicious criminal activity to the ICE/HSI Tip Line 24 hours a day, seven days a week. Highly trained specialists take reports from both the public and law enforcement agencies on more than 400 laws enforced by ICE/HSI. If you would like to report suspicious criminal activity, please call 866-DHS-2-ICE (866-347-2423) (from U.S. and Canada).

United States Postal Inspection Service: USPS encourages businesses to refer suspected online accounts promoting the sales of illicit fentanyl, opioids, and all other controlled substances to USPS through its 24-hour call center at 877-876-2455, Option #5.

Information to include in your law enforcement referral: We request that links to accounts offering these sales be preserved in their entirety, as they may contain valuable evidence. Additionally, please provide a brief description of the illicit activity, including a short

summary of your findings. Sending screenshots or screen grabs of the illicit activity can also be beneficial to investigators.

When preparing a referral, the following account-related information is particularly helpful:

- Account username
- Account user ID
- Address
- Any known mailing or postage meter accounts
- Any other associated accounts
- Associated telephone numbers
- Virtual currency addresses/Exchange/Wallet Software
- Images of illicit product being sold
- List of illicit products
- Login IP addresses
- Monikers or Display Names
- Registration email addresses
- Registration IP address
- Website URL

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