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**U.S. Department of Justice**  
Drug Enforcement Administration  
FOI/Records Management Section  
8701 Morrisette Drive  
Springfield, Virginia 22152

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**AUG 08 2016**

Case Number: 16-00673-F

Subject: Intelligence Products (DIB-026-12)

John Greenewald  
[REDACTED]  
[REDACTED]

Dear Mr. Greenewald:

This letter responds to your Freedom of Information/Privacy Act (FOI/PA) request dated June 13, 2016, addressed to the Drug Enforcement Administration (DEA), Freedom of Information/Privacy Act Unit (SARF), seeking access to information regarding the above subject.

The processing of your request identified certain materials that will be released to you. Portions not released are being withheld pursuant to the Freedom of Information Act, 5 U.S.C. § 552, and/or the Privacy Act, 5 U.S.C. § 552a. Please refer to the list enclosed with this letter that identifies the authority for withholding the deleted material, which is indicated by a mark appearing in the block next to the exemption. An additional enclosure with this letter explains these exemptions in more detail. The documents are being forwarded to you with this letter.

The rules and regulations of the Drug Enforcement Administration applicable to Freedom of Information Act requests are contained in the Code of Federal Regulations, Title 28, Part 16, as amended. They are published in the Federal Register and are available for inspection by members of the public.

For your information, Congress excluded three discrete categories of law enforcement and national security records from the requirements of the FOIA. *See* 5 U.S.C. § 552(c). This response is limited to those records that are subject to the requirements of the FOIA. This is a standard notification that is given to all our requesters and should not be taken as an indication that excluded records do, or do not, exist.

You may contact our FOIA Public Liaison at 202-307-7596 for any further assistance and to discuss any aspect of your request. Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, Room 2510, 8601 Adelphi Road, College Park, Maryland 20740-6001; e-mail at [ogis@nara.gov](mailto:ogis@nara.gov); telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769.

If you are not satisfied with my response to this request, you may administratively appeal by writing to the Director, Office of Information Policy (OIP), United States Department of Justice, Suite 11050, 1425 New York Avenue, NW, Washington, DC 20530-0001, or you may submit an appeal through OIP's FOIAonline portal by creating an account on the following web site: <https://foiaonline.regulations.gov/foia/action/public/home>. Your appeal must be postmarked or electronically transmitted within 90 days of the date of my response to your request. If you submit your appeal by mail, both the letter and the envelope should be clearly marked "Freedom of Information Act Appeal."

If you have any questions regarding this letter, you may contact Paralegal S. King at 202-307-7602.

Sincerely,



Katherine L. Myrick, Chief  
Freedom of Information/Privacy Act Unit  
FOI/Records Management Section

Number of pages withheld: 0

Number of pages released: 8

**APPLICABLE SECTIONS OF THE FREEDOM OF INFORMATION AND/OR PRIVACY ACT:**

<b>Freedom of Information Act 5 U.S.C. 552</b>			<b>Privacy Act 5 U.S.C. 552a</b>	
<input type="checkbox"/> (b)(1)	<input type="checkbox"/> (b)(5)	<input type="checkbox"/> (b)(7)(C)	<input type="checkbox"/> (d)(5)	<input type="checkbox"/> (k)(2)
<input type="checkbox"/> (b)(2)	<input checked="" type="checkbox"/> (b)(6)	<input type="checkbox"/> (b)(7)(D)	<input type="checkbox"/> (j)(2)	<input type="checkbox"/> (k)(5)
<input type="checkbox"/> (b)(3)	<input type="checkbox"/> (b)(7)(A)	<input type="checkbox"/> (b)(7)(E)	<input type="checkbox"/> (k)(1)	<input type="checkbox"/> (k)(6)
<input type="checkbox"/> (b)(4)	<input type="checkbox"/> (b)(7)(B)	<input type="checkbox"/> (b)(7)(F)		

Enclosures

**EXPLANATION OF EXEMPTIONS**  
**SUBSECTIONS OF TITLE 5, UNITED STATES CODE, SECTION 552**

- (b)(1) (A) specifically authorized under criteria established by an Executive order to be kept secret in the interest of national defense or foreign policy and (B) are in fact properly classified pursuant to such Executive order;
- (b)(2) related solely to the internal personnel rules and practices of an agency;
- (b)(3) specifically exempted from disclosure by statute (other than section 552b of this title), if that statute- (A)(i) requires that the matters be withheld from the public in such a manner as to leave no discretion on the issue; or (ii) establishes particular criteria for withholding or refers to particular types of matters to be withheld; and (B) if enacted after the date of enactment of the OPEN FOIA Act of 2009, specifically cites to this paragraph.
- (b)(4) trade secrets and commercial or financial information obtained from a person and privileged or confidential;
- (b)(5) inter-agency or intra-agency memorandums or letters which would not be available by law to a party other than an agency in litigation with the agency;
- (b)(6) personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy;
- (b)(7) records or information compiled for law enforcement purposes, but only to the extent that the production of such law enforcement records or information (A) could reasonably be expected to interfere with enforcement proceedings, (B) would deprive a person of a right to a fair trial or an impartial adjudication, (C) could reasonably be expected to constitute an unwarranted invasion of personal privacy, (D) could reasonably be expected to disclose the identity of a confidential source, including a State, local, or foreign agency or authority or any private institution which furnished information on a confidential basis, and, in the case of a record or information compiled by criminal law enforcement authority in the course of a criminal investigation or by an agency conducting a lawful national security intelligence investigation, information furnished by a confidential source, (E) would disclose techniques and procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law, or (F) could reasonably be expected to endanger the life or physical safety of any individual;
- (b)(8) contained in or related to examination, operating, or condition reports prepared by, on behalf of, or for the use of an agency responsible for the regulation or supervision of financial institutions; or
- (b)(9) geological and geophysical information and data, including maps, concerning wells.

**SUBSECTIONS OF TITLE 5, UNITED STATES CODE, SECTION 552a**

- (d)(5) information compiled in reasonable anticipation of a civil action proceeding;
- (j)(2) material reporting investigative efforts pertaining to the enforcement of criminal law including efforts to prevent, control, or reduce crime or apprehend criminals;
- (k)(1) information which is currently and properly classified pursuant to an Executive order in the interest of the national defense or foreign policy, for example, information involving intelligence sources or methods;
- (k)(2) investigatory material compiled for law enforcement purposes, other than criminal, which did not result in loss of a right, benefit or privilege under Federal programs, or which would identify a source who furnished information pursuant to a promise that his/her identity would be held in confidence;
- (k)(3) material maintained in connection with providing protective services to the President of the United States or any other individual pursuant to the authority of Title 18, United States Code, Section 3056;
- (k)(4) required by statute to be maintained and used solely as statistical records;
- (k)(5) investigatory material compiled solely for the purpose of determining suitability, eligibility, or qualifications for Federal civilian employment or for access to classified information, the disclosure of which would reveal the identity of the person who furnished information pursuant to a promise that his/her identity would be held in confidence;
- (k)(6) testing or examination material used to determine individual qualifications for appointment or promotion in Federal Government service the release of which would compromise the testing or examination process;
- (k)(7) material used to determine potential for promotion in the armed services, the disclosure of which would reveal the identity of the person who furnished the material pursuant to a promise that his/her identity would be held in confidence.

Drug Enforcement Administration

Drug Intelligence Brief

Serial: DEA-DEN-DIB-026-12

Product Date: April 24, 2012



**(U//FOUO/DSEN) United States: Green Acres is the Place to Be--Drug Traffickers and "Ganjapreneurs" Are Exploiting Colorado's Medical Marijuana Industry**

**(U) EXECUTIVE SUMMARY**

(U//FOUO) Drug traffickers and out-of-state opportunists are exploiting Colorado's medical marijuana laws. Recent revisions to state law have done little to prevent the involvement of criminals and individuals who use the law for financial gain.

(U//FOUO) Currently, convicted criminals and known drug traffickers participate in Colorado's medical marijuana industry.

Moreover, an influx of traffickers and entrepreneurs from other states is seeking to cash in on Colorado's medical marijuana industry. Investigative and intelligence information reveal a significant volume of Colorado-produced marijuana being diverted to out-of-state marijuana markets where it commands a higher price. This activity is facilitated both by those directly involved in medical marijuana businesses, as well as illicit brokers who seek "excess" or diverted marijuana to sell to marijuana traffickers.



(U//FOUO) Exterior of a recently seized non-compliant grow operation; Source: DEA

*(U) Information contained in this report may be related to ongoing law enforcement operations involving human sources or law enforcement undercover personnel. Unauthorized use or release may endanger the lives of law enforcement officers or jeopardize ongoing criminal investigations or prosecutions. Use of information in this report is pre-approved for US Government Intelligence Community products, including finished analytic products distributed to US executive branch departments/agencies. The portions used must carry the same classification and controls as this report, and readers of this report must hold appropriate clearances. The information in this report may not be used for operational or intelligence collection activities, nor shared with foreign persons or agencies, nor entered into non-DEA databases for operational purposes unless specific permission is granted by DEA.*

**(U) Background**

(U//FOUO) When Amendment 20, which established the state constitutional right for medicinal marijuana in Colorado, was passed by citizen petition in November 2000, the law dealt with the use and distribution of medical marijuana in a very general fashion. By 2010, Coloradans had witnessed a proliferation in the number of medical marijuana patients, caregivers, commercial dispensaries, sophisticated grow operations, and various associated business ventures such as marijuana brokers and consultants. Vague legislation and loose enforcement combined with an aggressive, profitable industry presents ample opportunity for diversion and exploitation. Colorado's legislative attempts to address the evolving industry are described in DEA-DEN-DIB-012-12. This document identifies avenues being used by drug traffickers and "ganjapreneurs" exploiting the permissive medical marijuana industry for profit.

**(U) The Usual Suspects: Criminal Involvement in Medical Marijuana**

(U//FOUO) The Colorado Medical Marijuana Code prohibits an individual who has served a sentence for a felony conviction in the past five years or has ever been convicted of a drug-related felony from owning a medical marijuana business.<sup>1</sup> The law allows for exceptions when "evidence of rehabilitation, character references, and educational achievements" are presented for consideration by the Medical Marijuana Enforcement Division (MMED) of the Colorado Department of Revenue, the agency charged with regulating the industry.<sup>2</sup> Nonetheless, the current Colorado medical marijuana industry is rife with individuals possessing both felony and misdemeanor criminal histories, as well as individuals known to be involved in drug trafficking. A July 2010 analysis conducted by the DEA Denver Intelligence Group found that approximately 58 percent of registered dispensary owners had some type of criminal history. Thirty-one percent had felony arrests. Twenty-one percent had felony drug arrests. Twenty-eight percent had some type of drug criminal history.<sup>3</sup> Subsequent analyses with updated figures produced similar percentages. These statistics suggest that, while some of these individuals are legally eligible to own medical marijuana businesses, they are likely to have affiliations with criminal elements or activities.

(U//FOUO) Some drug traffickers enter into the medical marijuana business through various schemes designed to hide their involvement. Businesses have been established in the names of family members or associates with no criminal history. In some cases, traffickers or convicted felons have covertly invested in medical marijuana businesses.

(U//FOUO) DEA reporting suggests that criminal groups, many ethnically-based, are involved in Colorado's medical marijuana industry. Members of Russian, Chinese, Vietnamese, and Mexican criminal organizations have been identified as medical marijuana business operators. Some also appear to have ties to non-medical marijuana criminal activities.

- (U//FOUO/DSEN) An ethnic Vietnamese family organization with registered dispensaries and off-site grow operations within Colorado was distributing medical marijuana outside the state.<sup>4</sup>



- (U//FOUO/DSEN) Reporting corroborated by recent enforcement action indicates that members of an ethnic Chinese group linked to the largest indoor multi-agency marijuana seizure in Colorado in 2008 are currently operating a dispensary and two offsite grow operations in suburban Denver.<sup>5</sup>
- (U//FOUO/DSEN) An individual acting as a sales representative for a marijuana grower is allegedly in partnership with a known Russian organized crime figure in Denver. Reporting suggests that once dispensaries enter into an agreement with this supplier, the Russian component begins exerting leverage on them, ultimately taking over the businesses.<sup>6</sup>
- (U//FOUO/DSEN) An individual tied to a Mexican poly-drug trafficking organization has been linked to a dispensary in northwest Denver.<sup>7</sup>

### **(U) One Step over the Line: Colorado Medical Marijuana Going Out of State**

(U//FOUO/DSEN) There is significant evidence that Colorado medical marijuana is distributed to out-of-state markets where it commands a high price. For example, between October 2010 and March 2011, two-thirds of the marijuana interdiction stops by the Kansas City Highway Patrol Interdiction Group in Topeka, Kansas, involved alleged medical marijuana from Colorado. Seized quantities of Colorado marijuana ranged from five to forty pounds, with ten pounds being a typical amount.<sup>8</sup> DEA Denver reporting in early 2011 revealed a group using private aircraft to transport medical marijuana out of state.<sup>9</sup>

(U//FOUO/DSEN) In early 2011, DEA Denver received information that a Denver-based trafficker was sending hundred-pound quantities of high-grade marijuana to the East Coast. The trafficker operated under the pretense of medical marijuana, although no marijuana businesses were registered in his name. He operated multiple warehouse-based grow operations and sold marijuana to multiple Colorado dispensaries as well as to out of state distributors.<sup>10</sup>

(U//FOUO/DSEN) A number of currency seizures linked to medical marijuana have been made in Midwestern states, including Kansas, Missouri, Iowa, and Nebraska. In July 2011, \$212,000 was seized from a vehicle in Missouri. The driver stated that he had delivered and been paid for 50 pounds of marijuana from a Colorado dispensary.<sup>11</sup>

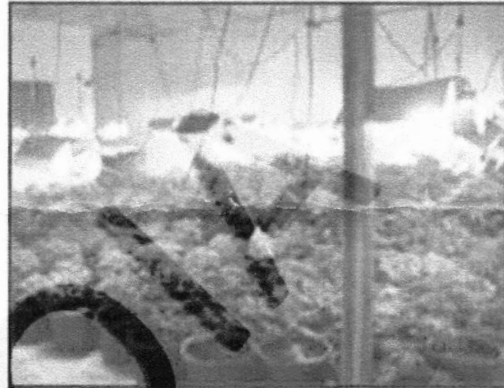
### **(U//FOUO/DSEN) The Green Migration to Colorado**

(U//FOUO) The exponential growth of Colorado's medical marijuana industry has attracted a significant number of out-of-state fortune seekers and drug traffickers who became affiliated with Colorado's compassionate care in order to make a profit. The Colorado Medical Marijuana Code, presumably in an effort to regulate the volume of out-of-state individuals creating marijuana businesses, imposed a two year residency requirement for all owners of marijuana businesses in 2010. Officers, managers, and employees of marijuana businesses must be

Colorado residents upon the date of their applications.<sup>12</sup> Ganjapreneurs have sought ways to proceed despite this requirement.

(U//FOUO/DSEN) Multiple individuals from different states, with known or possible ties to medical marijuana, appear to have used the same Arvada, CO address during 2010 and 2011. This may have been a means of circumventing the Colorado residency requirements. Similar patterns have been used by illegal aliens to establish residency in the state.<sup>13</sup>

(U//FOUO/DSEN) A DEA Atlanta investigation revealed an East Coast-based marijuana trafficker distributing marijuana grown in Colorado by registered medical marijuana businesses. Those businesses were operated by associates of a documented marijuana trafficker from Florida who relocated to Colorado. Reporting identified other East Coast marijuana traffickers who had or were planning to relocate to Colorado to operate under the pretense of medical marijuana.<sup>14</sup>



(U//FOUO) Grow area of a seized facility;  
Source: DEA

(U//FOUO/DSEN) In December 2011, a Denver area drug task force arrested two men after they had negotiated with an undercover officer to sell 200 pounds of marijuana for distribution outside Colorado. One of the men owns a dispensary and optional premises cultivation operation (also referred to as *off-site grow operations*), which he incorporated in 2009. Prior to that, he resided in Louisiana.<sup>15</sup> Notably, the dispensary owner's associate and co-defendant has a long history of felony drug convictions, including convictions for cocaine, methamphetamine, and marijuana distribution.<sup>16</sup>

(U//FOUO/DSEN) Moreover, the dispensary owner had a business partner in Louisiana who is currently the registered agent for a handful of marijuana businesses in Colorado. One of these businesses is a dispensary on file with MMED as authorized to serve more than 500 patients. The individual who manages that dispensary is yet another recent migrant, having relocated to Colorado from New Jersey in 2010.<sup>17</sup>

(U//FOUO/DSEN) In Breckenridge, Colorado, the self-identified owner of a dispensary began frequently appearing in local print media articles and on the dispensary's behalf at town council meetings. Investigative research revealed that he was a known marijuana trafficker in Richmond and Fredericksburg, Virginia. Despite his professed ownership of the dispensary, he does not appear in any business registration documentation. The business is registered to a female who has no criminal history.

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**(U) Out the Back Door: Illicit Brokers**

(U//FOUO/DSEN) Illicit brokers are exploiting Colorado's medical marijuana laws in an effort to profit from the growing industry. These individuals are not formally linked to a marijuana business and are not necessarily legitimate medical marijuana patients. The brokers cultivate transactions with dispensaries and grow operations willing to sell a portion of their inventory outside the medical marijuana system. In some instances, brokers have been arrested traveling eastbound outside of Colorado in possession of diverted medical marijuana or westbound with currency, presumably obtained from the sale of diverted medical marijuana.<sup>19</sup> In one example, the individual explained that he was transporting "surplus marijuana" from a Colorado dispensary.<sup>20</sup>

(U//FOUO/DSEN) DEA reporting notes instances of contact between marijuana brokers and known drug traffickers in the Midwest and East Coast. Sometimes, the brokers deal with Colorado indoor marijuana growers who make no pretense of operating as a "legitimate" medical marijuana business, but sell product to dispensaries and illicit distributors alike.

(U//FOUO/DSEN) Some small-scale traffickers known as "marijuana tourists" buy marijuana from dispensaries and return to their home states where they sell it.<sup>21</sup> In some cases, they are able to acquire marijuana from a dispensary without a medical marijuana registry card. In other cases, they have obtained a Colorado medical marijuana card. Under Colorado medical marijuana law, college or vocational school students who are not long term residents of Colorado may obtain medical marijuana cards. For example, in late 2011, a college student admitted to transporting marijuana purchased from Colorado dispensaries to an out-of-state market. The student had readily obtained a medical marijuana patient card, and within weeks, had made multiple trips from Colorado to his hometown to sell marijuana. The student purchased two ounces of marijuana per day, the legal limit, and was able to double his money.<sup>22</sup>

(U) Craigslist has become a popular advertising venue for dispensaries and those representing themselves as dispensaries. In early December 2011, a review of Beauty and Health listings in the Denver area revealed that 38 percent were for marijuana or marijuana cultivation equipment. One listing in particular referenced "extra medical cannibus" (sic), and another "extra med's for the weekend" (sic). Both offered strains of medical marijuana, but neither specified that a valid medical marijuana registry card is required in order to purchase it.<sup>23</sup>

*(U) The number of registered medical marijuana patients in Colorado has declined in recent months, from a peak of 128,698 in June 2011 to 82,089 in December 2011. In its medical marijuana blog, Westword, a prominent Denver alternative paper, pondered possible reasons for the waning numbers. A December 12, 2011, blog entry noted, "plenty of commenters on our blogs from people who have written that they are not re-upping with the registry for a myriad of reasons, from not wanting to be a part of a system that many find intrusive and waiting until the registry fee drops from \$90 to \$35 next month, to finding better deals on the black market ganja via sites like Craigslist." <sup>24</sup>*

### **(U) Under the Table: Marijuana Businesses as Fronts**

(U//FOUO) Current MMED rules require detailed recordkeeping and accountability on the part of medical marijuana businesses. Some of these businesses' records indicate compliance with state regulations; however, DEA reporting reveals that the businesses evade state taxes and divert marijuana through false recordkeeping. Examples include inflating the number of patients to whom the business or caregiver is a primary provider by possessing multiple binders with the same patient cards arranged in different order.<sup>25</sup> This provides cover for an excessive number of plants. MMED rules require floor plan grids from dispensaries and offsite grow operations to delineate which plants are grown for which patients. In some cases, these floor plans are falsified in order to justify more plants.<sup>26</sup> Moreover, some cash transactions are not entered into state-mandated sales records.<sup>27</sup>

(U//FOUO/DSEN) Many illegal distributors began as caregivers operating within state guidelines. At some point, the lure of extra money prompted them to enter into the black market. Denver Police Department officials report that most of the illegal indoor grows they encounter started out as registered caregivers for small numbers of patients before expanding into illegal distribution.<sup>28</sup> In late 2010, a Denver area drug task force arrested a husband and wife operating a marijuana grow in their basement. The two were registered caregivers for a small number of patients. An associate had approached them about increasing their operation and selling marijuana for illegal distribution, to which they agreed. The couple was required to provide the organization with their patients' registration cards, copies of which were kept at various grow sites. The investigation ultimately revealed the organization controlled six such grow sites. The marijuana was distributed illegally throughout Colorado, New Mexico, and Arkansas.<sup>29</sup>

(U//FOUO/DSEN) In another case, an individual who was exploring avenues through which to enter the medical marijuana market consulted an attorney known to be involved with the medical marijuana industry as a registered agent for marijuana related businesses. The attorney presented the individual with a business platform which required a significant investment. A marijuana grow operation was set up in the individual's garage, purportedly to supply a dispensary affiliated with the organization. The individual was required to solicit as many associates as possible to obtain medical marijuana patient identifications, which were copied and maintained at numerous grow sites run by the organization. Later, the individual financed the acquisition and outfitting of a grow warehouse for the organization. The individual

ultimately realized that almost none of the marijuana grown by the organization was used to supply the dispensary that was designated to receive the marijuana. In fact, the dispensary served as a front for the organization's multi-site grow operation. The individual eventually realized that the marijuana was being sent out of state.<sup>30</sup>

### **(U) Outlook and Opportunities**

(U//FOUO) In April 2012, MMED cut 17 of its 37 staffers because the state has not collected enough in license fees to fund MMED's \$5.7 million budget. In fact, only \$418,750 in medical marijuana license fees has been collected since July 1, 2011. Out of 817 pending applications, MMED has issued only 81 dispensary licenses<sup>31</sup>. Nonetheless, hundreds of dispensaries continue to operate throughout the state. This calls into question the effectiveness of Colorado's regulation of the medical marijuana industry and enforcement of the Colorado Medical Marijuana Code.

(U//FOUO) The threat of decisive law enforcement and meaningful regulation may offset the exploitation of medical marijuana by drug traffickers, organized criminals, and those lured by the vast profits currently available. Moreover, in January 2012, the Colorado United States Attorney's Office sent notifications to 23 dispensaries located within 1,000 feet of schools, requiring them to relocate or close within 45 days. On February 28, 2012, DEA verified that all businesses notified had agreed to comply.

(U//FOUO) Colorado's medical marijuana system allows for widespread exploitation and illicit marijuana distribution. It has yet to be seen whether the fledgling MMED and local law enforcement efforts will catch up to the industry as it exists and ultimately gain effective control. Given the current momentum of the medical marijuana movement and outright legalization efforts, it is a daunting challenge. Colorado is on track to become a primary source of supply for high-grade marijuana throughout the country.

(U) This product was prepared by DEA's Denver Field Division, Intelligence Group. Permission for operational or collection use, sharing with foreign persons or agencies, downgrade, or use in operational non-DEA databases may be requested by writing to [dea.onsi@doj.ic.gov](mailto:dea.onsi@doj.ic.gov), [dea.onsi@dea.usdoj.sgov.gov](mailto:dea.onsi@dea.usdoj.sgov.gov), or [dea.onsi-dl@dea.usdoj.gov](mailto:dea.onsi-dl@dea.usdoj.gov). Points of contact are the Chief, Production and Analysis Unit (b)(6) and the Chief, Production Section (b)(6).

<sup>1</sup> (U) Colorado House Bill 10-1284 12-43.3-307-XIII(2)(a).

<sup>2</sup> Ibid.

<sup>3</sup> (U) DEA: Denver Reporting, 2011; Overall document classification is: (U//FOUO/DSEN); Extracted portion is: (U//FOUO).

<sup>4</sup> (U) DEA: Denver Investigative Reporting, July 25, 2011; Overall document classification is: (U//FOUO/DSEN); Extracted portion is: (U//FOUO/DSEN).

- <sup>5</sup> (U) DEA; Denver Investigative Reporting, January 12, 2011; Overall document classification is: (U//FOUO/DSEN); Extracted portion is: (U//FOUO/DSEN).
- <sup>6</sup> (U) DEA; Denver Investigative Reporting, June 27, 2011; Overall document classification is: (U//FOUO/DSEN); Extracted portion is: (U//FOUO/DSEN).
- <sup>7</sup> (U) DEA; Denver Investigative Reporting, September 7, 2011; Overall document classification is: (U//FOUO/DSEN); Extracted portion is: (U//FOUO/DSEN).
- <sup>8</sup> (U) DEA; Denver Investigative Reporting, April 5, 2011; Overall document classification is: (U//FOUO/DSEN); Extracted portion is: (U//FOUO/DSEN).
- <sup>9</sup> (U) DEA; Denver Investigative Reporting, January 24, 2011; Overall document classification is: (U//FOUO/DSEN); Extracted portion is: (U//FOUO).
- <sup>10</sup> (U) DEA; Denver Investigative Reporting, April 11, 2011; Overall document classification is: (U//FOUO/DSEN); Extracted portion is: (U//FOUO/DSEN).
- <sup>11</sup> (U) DEA; St. Louis Investigative Reporting, August 9, 2011; Overall document classification is: (U//FOUO/DSEN); Extracted portion is: (U//FOUO/DSEN).
- <sup>12</sup> (U) Colorado House Bill 1043-12-43.3-310.
- <sup>13</sup> (U) DEA; Denver Investigative Reporting, August 23, 2011; Overall document classification is: (U//FOUO/DSEN); Extracted portion is: (U//FOUO/DSEN).
- <sup>14</sup> (U) DEA; Denver Investigative Reporting, April 15, 2011; Overall document classification is: (U//FOUO/DSEN); Extracted portion is: (U//FOUO/DSEN).
- <sup>15</sup> (U) DEA; Denver Investigative Reporting, December 29, 2011; Overall document classification is: (U//FOUO/DSEN); Extracted portion is: (U//FOUO/DSEN).
- <sup>16</sup> (U) DEA; HQ Reporting; Overall document classification is: (U//FOUO/DSEN); Extracted portion is: (U//FOUO/DSEN).
- <sup>17</sup> (U) DEA; Denver Investigative Reporting, December 19, 2011; Overall document classification is: (U//FOUO/DSEN); Extracted portion is: (U//FOUO/DSEN).
- <sup>18</sup> (U) DEA; Denver Investigative Reporting, August 29, 2011; Overall document classification is: (U//FOUO/DSEN); Extracted portion is: (U//FOUO/DSEN).
- <sup>19</sup> (U) DEA; Denver Reporting, April 5, 2011; Overall document classification is: (U//FOUO/DSEN); Extracted portion is: (U//FOUO/DSEN).
- <sup>20</sup> (U) DEA; St. Louis Investigative Reporting, August 9, 2011; Overall document classification is: (U//FOUO/DSEN); Extracted portion is: (U//FOUO).
- <sup>21</sup> (U) DEA; Denver Investigative Reporting, April 5, 2011; Overall document classification is: (U//FOUO/DSEN); Extracted portion is: (U//FOUO/DSEN).
- <sup>22</sup> (U) DEA; Denver Investigative Reporting, November 30, 2011; Overall document classification is: (U//FOUO/DSEN); Extracted portion is: (U//FOUO/DSEN).
- <sup>23</sup> (U) Craigslist-Denver area; Beauty and Health listings; December 6-7, 2011, available at [www.Denver.craigslist.org/hab](http://www.Denver.craigslist.org/hab).
- <sup>24</sup> (U) "Medical Marijuana: CDPHE Stats Show 40,000 Patient Dip in Registry," *Westword Blogs* (December 12, 2011), available at <http://blogs.westword.com>.
- <sup>25</sup> (U) DEA; Denver Investigative Reporting, July 25, 2011; Overall document classification is: (U//FOUO/DSEN); Extracted portion is: (U//FOUO).
- <sup>26</sup> *Ibid.*
- <sup>27</sup> *Ibid.*
- <sup>28</sup> (U) DEA; Denver Reporting, October 4, 2011; Overall document classification is: (U//FOUO/DSEN); Extracted portion is: (U//FOUO).
- <sup>29</sup> (U) DEA; Denver Investigative Reporting, March 3, 2011; Overall document classification is: (U//FOUO/DSEN); Extracted portion is: (U//FOUO/DSEN).
- <sup>30</sup> (U) DEA; Denver Investigative Reporting, July 17, 2011; Overall document classification is: (U//FOUO/DSEN); Extracted portion is: (U//FOUO/DSEN).
- <sup>31</sup> (U) "Pot Regulators Slashed in Colorado," [www.denverpost.com](http://www.denverpost.com), April 5, 2012