This document is made available through the declassification efforts and research of John Greenewald, Jr., creator of:



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

JUL 1 9 2018

Case Number: 18-00345-F

Subject: Information on Deceased Third Party-Shulgin, Alexander Theodore "Sasha"

John Greenewald 27305 West Live Oak Road, Suite 1203 Castaic, California 91384

Dear Mr. Greenewald:

This letter responds to your Freedom of Information/Privacy Act request dated February 15, 2018, addressed to the Drug Enforcement Administration (DEA), Freedom of Information/Privacy Act Unit, seeking access to information regarding the above subject.

After reviewing your request, we conducted a search for responsive records pertaining to the above subject. To search for responsive records, we queried the DEA Investigative Reporting and Filing System (IRFS). IRFS is the system of records that contains all administrative, general and investigative files compiled by DEA for law enforcement purposes. As a result of our query, we were able to identify records pertaining to the subject of your request.

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 (FOIA), 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 DEA applicable to FOIA 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; 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: <u>https://foiaonline.regulations.gov/foia/action/public/home</u>. 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 Chris Haugen at 202-307-6080.

Sincerely, Le la

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

Number of pages withheld: 552

Number of pages released: 234 (on 1 CD)

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

Freed	om of Informa 5 U.S.C. 552	tion Act	Privacy 5 U.S.C.	
[] (b)(1)	[] (b)(5)	[X] (b)(7)(C)	[](d)(5)	[](k)(2)
[] (b)(2)	[] (b)(6)	[] (b)(7)(D)	[] (j)(2)	[](k)(5)
[X] (b)(3)	[X] (b)(7)(A)	[X] (b)(7)(E)	[](k)(1)	[](k)(6)
[] (b)(4)	[] (b)(7)(B)	[X] (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, or asfer 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.

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		IV.	ARREST (Complete	for all Arre	st Sub	missions)			
8. Date of Arrest	a	City			39. PL b. County		ARREST		c. State/Co	untry
Oa. Armed 40b.	If Armed (ente	er Number of Wea	apons by Type)				41a. Type of V	iolation (Posse	ssion, Sale, etc.)
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		V. FUG		LARATIC	N (Compl	ete as	appropria	nte)		A second second second second second
2. Type Prearrest Post Arrest	43. NCIC NO				ehension oonsibility EA 🗌 USM		Area Cod	act Person (Na e)	ame and Phone	No Include
6. Warrant No.	47. [Date / Place of Issu	e (City & Stat				48.	USMS Office I	lolding Warrant	(City & State)

58. REMARKS (Refer to Item No. when applicable)

SYNOPSIS:

On 09-27-94, 10-27-94 and 10-31-94, the DEA executed Administrative Inspections of Alexander SHULGIN's laboratory/residence based on his public statements regarding research with Hallucinogens (High Times Article, 08-94) and a review of Dr. SHULGIN's violative history with the DEA. The DEA inspections and subsequent investigations reveal that SHULGIN is conducting unauthorized Schedule I research, manufacturing and distribution of Schedule I controlled substances and their analogs including MDA, MDMA, LSD, MMDA-2, and failed to maintain controlled substance receipt, manufacturing and destruction records. On 10-27-94, inspection by the DEA, Alexander SHULGIN was found to be in illegal possession of six Schedule I Peyote plants. The DEA SFFD also participated in a State Criminal Search Warrant of Dr. SHULGIN's residence involving possible environmental violations. This investigation is ongoing. SHULGIN is also believed to be involved in illegal human drug testing.

QUANTITATIVE REQUIREMENT:

(b)(7)(E)

DRUG QUANTITY REQUIRED: (b)(7)(E)

ACTUAL DRUG QUANTITY DOCUMENTED: On 10-27-94, during a DEA inspection, Dr. SHULGIN was found to be in possession of 25 grams of the controlled substance analog MMDA-2. 25 grams of MMDA-2 equals a d.u. 25 grams of MMDA-2 yields approximately 1,000 d.u. (see DEA ROI (b)(7)(E) dated 11-03-94).

ACTUAL DRUG QUANTITY: Unknown, not yet analyzed by DEA Special Testing Laboratory, McLean, VA.

EPIC CHECK: negative except for NADDIS Hits (b)(7)(E)

59. AGENT'S NAME (Print or Type) (b)(7)(C);(b)(7)(F) TFA 62. SUPERVISOR'S NAME (Print or Type) (b)(7)(C);(b)(7)(F) (b)(7)(C);(b)(7)(F) G/S	(b)(7)(C);(b)(7)(F)	61. DATE 18-5-94 64. DATE 12/5-94
65. REVIEWED BY		
HEADQU	RTERS APPROVAL (If appropriate)	
68. REVIEWED BY	and a second	ONCURRENCE 71. DATE

U.S. Department of Justice

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U.S. Department of Justice



Drug Enforcement Administration

		F DRUG EVIDENCE	FILETITLE		9/9/96	
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CASE AGEN	IT (Signature) IT (Signature) (Date) (Date) (Date) (b)(7)(C);(b)(7)(F)	DA'TE PART regoing exhibits were disposed of a	f II as indicated above.		3/) ATE - 4-96	
CASE AGEN	IT (Signature) IT (Signature) (Date) (Date) (Date) (b)(7)(C);(b)(7)(F)	DATE PART regoing exhibits were disposed of a regoing exhibits were transferred t	f II as indicated above.	10-	3./. ATE - 4-96	
CASE AGEN	IT (Signature) IT (Signature) (Date) (Date) (Date) (b)(7)(C);(b)(7)(F)	DATE PART regoing exhibits were disposed of a regoing exhibits were transferred t	f II as indicated above.		<u>3/</u> ATE - 4-96	
CASE AGEN	IT (Signature) IT (Signature) (Date) (Date) (Date) (b)(7)(C);(b)(7)(F)	DATE PART regoing exhibits were disposed of a regoing exhibits were transferred t (b)(7)(C):(b)(7)(F)	F II as indicated above. bo (b)(7)(C):(b)(7)(F)		3/1 ATE - 4-46	
CASE AGEN	IT (Signature) IT (Signature) (Date) (Date) (Date) (b)(7)(C);(b)(7)(F)	DATE PART regoing exhibits were disposed of a regoing exhibits were transferred t e)	F II as indicated above. bo (b)(7)(C):(b)(7)(F)		- 4-96	
CASE AGEN	IT (Signature) It (Signature) (Date) (Date) (b)(7)(C);(b)(7)(F)	DATE PART regoing exhibits were disposed of a regoing exhibits were transferred t (b)(7)(C):(b)(7)(F)	F II as indicated above. bo (b)(7)(C):(b)(7)(F)		<u>3/</u> ATE - 4-96	
CASE AGEN	IT (Signature) It (Signature) (Date) (Date) (b)(7)(C);(b)(7)(F)	DATE PART regoing exhibits were disposed of a regoing exhibits were transferred t (b)(7)(C):(b)(7)(F)	F II as indicated above. bo (b)(7)(C):(b)(7)(F)		3/1 ATE - 4-96	
CASE AGEN	IT (Signature) It (Signature) (Date) (Date) (b)(7)(C);(b)(7)(F)	DATE PART regoing exhibits were disposed of a regoing exhibits were transferred t (b)(7)(C):(b)(7)(F)	F II as indicated above. bo (b)(7)(C):(b)(7)(F)		- 4-96	
CASE AGEN	IT (Signature) It (Signature) (Date) (Date) (b)(7)(C);(b)(7)(F)	DATE PART regoing exhibits were disposed of a regoing exhibits were transferred t (b)(7)(C):(b)(7)(F)	F II as indicated above. bo (b)(7)(C):(b)(7)(F)		- 4-96	
CASE AGEN	IT (Signature) It (Signature) (Date) (Date) (b)(7)(C);(b)(7)(F)	DATE PART regoing exhibits were disposed of a regoing exhibits were transferred t (b)(7)(C):(b)(7)(F)	F II as indicated above. bo (b)(7)(C):(b)(7)(F)		3/1 ATE 	
CASE AGEN	IT (Signature) It (Signature) (Date) (Date) (b)(7)(C);(b)(7)(F)	DATE PART regoing exhibits were disposed of a regoing exhibits were transferred t (b)(7)(C):(b)(7)(F)	F II as indicated above. bo (b)(7)(C):(b)(7)(F)		- 4-46	

U. S. Department of Justice

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	REPORT OF INVES	STIGATION			Page 1	lof	1	
1. Pro	gram Code	2. Cross File	Related Files	3. File No.			G-DEP Ider	ntifier
	(h)(7)(0)(h)(7)(5)			(b)(7)(E)	-		(b)(7)(E)	
5. By:				6. File Title				
At:				SHULGIN,	Alexande	r		
	San Francisco, CA							
7 []				8. Date Prepared		-		
	Closed Requested Action Completed			2-20-97				
	her Officers: None			2-20-31	•••••••			
10. Re	oport Re: Case Closure							
		All and a second se						
DETA	ILS:							
1.	As of the prepared dat	e of this	nonont thi	a			h 1 1	
	status for the purpose	e of the C	AST SUBSYSTE	S Case is prea	sently 1	nτ	the belo	w checke
	statue for the purpose		AST SUBSISIE	A RECORD.				
	ACTIVE = A	4						
	and the second s	JDICIAL = .	I					
		JGITIVE = H						
		ON PENDING						
		UCTION PEN						
	APPEAL PEN							
	ADMINISTRA	TIVE CLOSE	E = AC					
	X NORMAL CLC							
			(b)(7)(C);(b)(
2.	On 9/10/96, D/I (b)(7)(C);(b	(7)(F) infor	med $S/A_7(F)$	that Alexa	nder SHU	JLC	IN had	
	surrendered his DEA Re	gistration	and paid a	\$25,000,00 ci	vil find	o +	a the G	overnment
	$D/I_{7)(F)}^{(b)(7)(C);(b)(}$ also told S	7)(F)	that all ci	vil action aga	inst SHU	JLG	IN was	complete.
.,			-					
3.	All required DEA-6's h	ave been c	completed an	d submitted in	the cas	se.		
4.	DEA Form 18 hours also	h						
·.	DEA Form 48 have also	been compi	eted and su	bmitted in thi	s case.	A	s of 12	-3-96, al
	DEA Form 48s have been drug evidence was seiz	ed No an	and all dru	g evidence has	been de	est	royed.	No non-
	required.	ed. No al	rest was ma	de, therefore	no dea f	or	m 210 i	S
	. oquit ou.							
5.	Based on the above fac	ts that al	ladministr	tive and judi	aial mas		dunce h	b
	completed, this case i	s consider	ed closed	active and Judi	ciai pro	bee	aures na	ave been
	. ,		04 010004.					
INDE	LING SECTION:		*					
1.	SHULGIN, Alexander - N	ADDIS $\#^{(b)(7)}$)(E)					
11. Dis	tribution: SARI, DOS	12. (b)(7	7)(C);(b)(7)(F)			-	1	3. Date
Di	vision							- 12.10-
								2/20177
Dis	strict	14.					1	5. Date
	D()(7)(C);(b)(7]						1. 4.
	Diversion D/Ih(F)						4	-120 M
Ot						And in case of the local division of the loc	and the second se	
DEA Fo								
-	m _ 6 (7)(F)		Enforcement Admin				1 - Prose	ecutor

-

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02/11/97

6

(b)(7)(E)		

CASE HAS BEEN CONSOLIDATED - IN FINAL FILE

(b)(7)(E)	12/03/96	(b)(7)(C);(b)(7)(F)	(b)(7)(C);(b)(7)(F)	$\neg \lambda$	197
				N	·

(b)(7)(C);(b)(7)(F)
	(D)(7)(C)()(7)(F)
(b)(7)(C);(b)(7)(F)	Trom: Group (b)(7)(C);(b)(7)(F)
Attention:	
Date: 1-10-9	
Re: Request For CAPS Information	
Case File Closure Review: Yes_	No/
Case File Status Review: Yes_	Not
Please send CAPS information for the (b)(7)(E)	following cases:
···	
	5
TO BE COMPLETED B	Y ARG
Data Analyst	Complete for Case File Closure Review
Received Date	Seizure Files are: Closed(F) (b)(7)(C);(b)(7) (F)
CAPS Printout Attached? Yes No	(b)(7)(C);(b)(7)(F)
Legal Technician Received Date	G/S, ARG
Date Forwarded to Group CAPS Printout Attached? -Yes_/_ No	-

.

;

COMPUTERIZED ASSET PROGR CASESUM 13 JAN 97 SUMMARY - ALL EXHIBITS WITHIN A ASE 13:20:21 CASE NUMBER: (b)(7)(E) TOTAL VALUE OF ALL ASSETS: \$0.00 SEIZURE SYSID EXHIBIT DESCRIPTION OF PROPERTY VALUE DATE *** END OF REPORT *** There who no assets suged ------\$\$ENTER L = LOGOFF M204 Q = RETURN TO SYSTEM MENU M = RETURN TO PREVIOUS MENU-S = RETURN TO INPUT SCREEN OR HIT ENTER L 22/24 C 3 +

REPORT OF INVES	TIGATION	Pa	ge 1 of 1
1. Program Code 5. By: (b)(7)(C);(b)(7)(F) S/A A: Task Force I San Francisco, CA	2. Cross Related Files File	3. File No. (b)(7)(E) 6. File Title SHULGIN, Alexa:	4. G-DEP Identifier (b)(7)(E)
Closed Requested Action Completed Action Requested By: Other Officers: None		8. Date Prepared September 10,	1996
10. Report Re: Case Status			
X DRUG DESTR	of the CAST SUBSYST DICIAL = J GITIVE = F ON PENDING = C UCTION PENDING = D	is case is presently SM RECORD.	y in the below checke
NORMAL CLO (b)(7)(C);(b)(2. On 9-10-96, S/A)(F) (b)(7)(F) ase. D/I told vas complete. SHULGIN fine to the Government	TIVE CLOSE = AC SE = NC spoke to Diversion I $S/A_{7/(F)}^{(b)(7)(C);(b)(}$ that all surrendered his DEA	civil action agains	st Alexander SHULGIN
ADMINISTRA NORMAL CLO (b)(7)(C);(b)(2. On 9-10-96, S/A)(F) (c):(b)(7)(F) ase. D/I told vas complete. SHULGIN	TIVE CLOSE = AC SE = NC spoke to Diversion I $S/A_{(T)(F)}^{(b)(7)(C);(b)()}$ that all surrendered his DEA submitted DEA-48's f	civil action agains registration and pa	at Alexander SHULGIN aid a \$25,000.00 civil
ADMINISTRA NORMAL CLO NORMAL CLO (b)(7)(C);(b)((b)(7)(C);(b)(Pase. D/I told vas complete. SHULGIN fine to the Government Con 9-10-96, S/A)(F) Once completed this case CADEXING SECTION:	TIVE CLOSE = AC SE = NC spoke to Diversion I $S/A_{(D)(7)(C);(b)()}^{(b)(7)(C);(b)()}$ that all surrendered his DEA submitted DEA-48's f se will be closed.	civil action agains registration and pa	at Alexander SHULGIN aid a \$25,000.00 civi
ADMINISTRA NORMAL CLO 2. On 9-10-95, S/A)(F) 2):(b)(7)(F) ase. D/I told vas complete. SHULGIN fine to the Government 3. On 9-10-96, S/A)(F)	TIVE CLOSE = AC SE = NC spoke to Diversion I $S/A_{(D)(7)(C);(b)()}^{(b)(7)(C);(b)()}$ that all surrendered his DEA submitted DEA-48's f se will be closed.	civil action agains registration and pa	at Alexander SHULGIN aid a \$25,000.00 civi
ADMINISTRA NORMAL CLO NORMAL CLO (b)(7)(C);(b)((c):(b)(7)(F) ase. D/I told vas complete. SHULGIN fine to the Government . On 9-10-96, S/A (F) Once completed this cas NDEXING SECTION:	TIVE CLOSE = AC SE = NC spoke to Diversion I $S/A_{(D)(7)(C);(b)()}^{(b)(7)(C);(b)()}$ that all surrendered his DEA submitted DEA-48's f se will be closed.	civil action agains registration and pa	at Alexander SHULGIN Aid a \$25,000.00 civi
ADMINISTRA NORMAL CLO 2. On 9-10-96, S/A)(F) 2):(b)(7)(F) ase. D/I told vas complete. SHULGIN fine to the Government 3. On 9-10-96, S/A)(F) Once completed this cas (NDEXING SECTION:	TIVE CLOSE = AC SE = NC spoke to Diversion I $S/A_{(D)(7)(C);(b)()}^{(b)(7)(C);(b)()}$ that all surrendered his DEA submitted DEA-48's f se will be closed.	civil action agains registration and pa	at Alexander SHULGIN aid a \$25,000.00 civil
ADMINISTRA NORMAL CLO 2. On 9-10-96, S/A)(F) (b)(7)(C);(b)(7)(C);(b)(7)(C);(b)(7)(C);(b)(7)(F) (as complete. SHULGIN fine to the Government 3. On 9-10-96, S/A)(F) Once completed this cas (MDEXING SECTION: 1. Distribution: SARI Division	TIVE CLOSE = AC SE = NC spoke to Diversion I $S/A_{(D)(7)(C);(b)()}^{(D)(T)(C);(b)(T)(E)}$ that all submitted DEA-48's f se will be closed. ADDIS $\frac{(b)(7)(C)}{(E)}$	civil action agains registration and pa	t Alexander SHULGIN aid a \$25,000.00 civil the drug evidence. 13. Date 9/10/96

U. S. Department of Justice Drug Enforcement Administration

REPORT OF INVESTIGATION			Page 1 of		
1. Program Code 5. By: (b)(7)(C);(b)(7)(F) TFA	2. Cross File	Related Files	3. File No. (b)(7)(E) 6. File Title	4.	G-DEP Identifier (b)(7)(E)
At Clan Lab Task Force San Francisco, CA			SHULGIN, Ale	xander	•
7. Closed Requested Action Completed	1 0		8. Date Prepared		
Action Requested By:	_		April 17, 19	96	
9. Other Officers: None					
10. Report Re: Case Status					

DETAILS:

6

1. As of the prepared date of this report, this case is presently in the below checked status for the purpose of the CAST SUBSYSTEM RECORD.

	ACTIVE = A
-	PENDING JUDICIAL = J
	PENDING FUGITIVE = F
<u>x</u>	CIVIL ACTION PENDING = C
	DRUG DESTRUCTION PENDING = D
	APPEAL PENDING = P
	ADMINISTRATIVE CLOSE = AC
	NORMAL CLOSE = NC
INDEXING SECTION:	None

(b)(7)(C);(b)(7)(F) SARI 13. Date 11. Distribution: 4-13-96 Division 15. Date District Other r b)(7)(C);(b)(7 DEA Form (Aug. 1994) (F) DEA SENSITIVE 6 **Drug Enforcement Administration** 3 - Originating Office

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U. S. Department of Justice Drug Enforcement Administration

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REPORT OF INVES	Page 1 of 1		
1. Program Code 5. By: (b)(7)(C);(b)(7)(F) At: Clan Lab Task Force San Francisco, CA	2. Cross Related Files	3. File No. 4. G-DEP Identifier (b)(7)(E) (b)(7)(E) 6. File Title SHULGIN, Alexander	
7. Closed Requested Action Completed		8. Date Prepared October 16, 1995	

DETAILS:

.

Reference is made to a current change in G-Dep classification. The new G-Dep is $^{(b)(7)(E)}$ 1.

INDEXING SECTION:

NONH

11. Distribution: SAR Division District	(b)(7)(C);(b)(7)(F)	13. Date 10/14/-9 5 15. Date
Other		10/19/55
DEA Form (Aug. 1994) - 6	DEA SENSITIVE Drug Enforcement Administration	3 - Originating Office
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REPORT OF INVESTIGATION	Page 1	of 1
Program Code 2. Cross Related Files File	3. File No. (b)(7)(E)	4. G-DEP Identifier (b)(7)(E)
By: (b)(7)(C);(b)(7)(F) TFA At: Clan Lab Task Force	6. File Title SHULGIN, Alexande	
At Clan Lab Task Force		
Closed Requested Action Completed	8. Date Prepared	
Action Requested By:	October 3, 1995	
Other Officers: None		
Report Re: Case Status		
ETAILS:		
. As of the prepared date of this report, this status for the purpose of the CAST SUBSYST	is case is presently i EM RECORD.	n the below checked
ACTIVE = A		
PENDING JUDICIAL = J		
PENDING FUGITIVE = F		
X CIVIL ACTION PENDING = C		
DRUG DESTRUCTION PENDING = D		1
APPEAL PENDING = P		
ADMINISTRATIVE CLOSE = AC		
NORMAL CLOSE = NC		
. On October 3, 1995, TFA ^{(b)(7)(C);(b)(} spoke to Divergarding this investigation. $D/I_{J(F)}^{(b)(7)(C);(b)(7)}t$ pending Civil Action by the U.S. Government active.	version Investigator (intersion Transformation (intersion of the transformation of transformati	HULGIN is still
IDEXING SECTION:		
SHULGIN, Alexander - NADDIS not available.		
Distribution: SARI, OW [1(b)(7)(C);(b)(7)(F)		13. Date

15. Date District 10 11 pervisor Other (b)(7)(C);(b)(7)(F) DEA Form (Aug. 1994) DEA SENSITIVE Drug Enforcement Administration - 6 3 - Originating Office

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U. S. Department of Justice

Drug Enforcement Administration

REPORT OF INVEST	Page 1 of		
At: Clan Lab Task Force San Francisco, CA	2. Cross Related Files	3. File No. (b)(7)(E) 6. File True SHULGIN, Alexander	
Closed Requested Action Completed		8. Date Prepared June 28, 1995	
9. Other Officers: None			
10. Report Re: Quarterly Statu	s: (C) Change from	Previous Month Yes No X.	

-18

DETAILS:

4

1. As of the prepared date of this report, this case is presently in the below checked status for the purpose of the CAST SUBSYSTEM RECORD.

ACTIVE = A

PENDING JUDICIAL = J

PENDING FUGITIVE = F

X CIVIL ACTION PENDING = C

DRUG DESTRUCTION PENDING = D

APPEAL PENDING = P

ADMINISTRATIVE CLOSE = AC

NORMAL CLOSE = NC

INDEXING SECTION:

None.

DEA Form (Aug. 1994) - 6	DEA SENSITIVE Drug Enforcement Administration	3 - Originating Office
District		15. Date
11. Distribution: AMRI, Division	(b)(7)(C);(b)(7)(F)	13. Date 170395

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REPORT OF INV	ESTIGATION			Page 1 of	1
Program Code	2. Cross File	Related Files	3. File No. (b)(7)(E)	4. G-DEP (b)(7)(E	Identifier
(b)(7)(C);(b)(7)(F)		L	5. File Title		
By: Clan Lab Task Force		6	SHULGIN, Ale	xander	
San Francisco, CA			,		
Closed Requested Action Complet	ted D	8	. Date Prepared		**
Action Requested By:			May 1, 1995		
Other Officers: #One					
. Report Re: Quarterly Sta	atus: (C) Chan	ge from Pre	vious Month Ye	SXNO	
STAILS:					
A COLLEY .					
As of the prepared of status for the purpo	late of this re ose of the CAST	port, this SUBSISTEM	case is presen RECORD.	tly in the t	elow checked
ACTIVE :	: A				
PENDING	JUDICIAL = J				
PENDING	FUGITIVE = F				
X CIVIL AC	TION PENDING =	С			
	B				
DRUG DES	STRUCTION PENDI	NG = D			
APPEAL P	ENDING = P				
ADMINIST	RATIVE CLOSE =	AC			
NORMAL C	LOSE = NC				
$\frac{\text{On May}}{(b)(7)(C);(b)(7)} \text{that on April}$	14, 1995, SHUI Federal Civil (LGIN was se Complaint i	n the Northern	gator (D/I) tice to Show District of	California.
DEXING SECTION:					
ne.					
ANDT OU	(b)(7)(C);(l	b)(7)(F)			
Distribution:	12				13. Date
Division					5-12-4
District	14				15. Date
Other (b)(7)(C);(b)(SIN
A Form - 6		A SENSITIVE	ation	3 - Originat	
	This report is the property nor its contents may be di			-	
Neither II				ilou.	
	Previous editi	ion dated 5/80 may	be used.		
		Page 15			

U.S. Department of Justice Drug Enforcement Administration

	REPORT OF INVEST				Page 1		
	RAM CODE	2. CROSS FILE	RELATED FILES	3. EILE NO. (b)(7)(E)	1 I	(b)(7)(E)	IER
5. mv)(7)(C);(b)(7)(F)			6. FILE TITLE			
C	lan Lab Task Force	Ιŭ	-	SHULGIN, A	lexander		
3	an Francisco, CA	Ī					
	<u>`</u>						
	eed Requested Action Completed			S. DATE PREPAR November 1	Contrast La Contrast Contrast		
Act	tion Requested By: R OFFICERS: See paragraph	"otner o	fficers".		, 1991		
J. OTHE	h orricens.						
	DRTRE: EXECUTION of Fede tion of drug exhibits 1			pection War	rant and		
acquisi	cion of drug exhibits f	Larough	0.				
	DEFENDANTS:	/	Alexander SHUL	GIN			
	DOB:	6°	06/17/25				
	POB:/		Unknown 148 <u>3</u> Shulgin R	d Information	- CA		
	CA Driver's License:		¥074301	u., Lalayet	e, CA		
		1			1		
	VIOLATION:		11363 Calif. H	ealth and Si	afety Code	• •	
			Planting, Cult	ivating, and	Processi	ng	
			Peyote.	/	/		
	JUDICIAL DISTRICT:		Cantan Cantal	anne Deat			
	SUDICIAL DISTRICT:		Contra Costa C Office.	ounty Distri	let Attorn	ley's	
	DATE AND TIME						
	OF INCIDENT:	(Detober 27, 19	94, at 9:00	am.		
USTODY	OF EVIDENCE:			/			
				/			
DRUG EX	HIBITS:						
			/.	-			
1. 01	n October 27, 1994, a Fo 48 <u>3 Shulgin</u> Road, Lafay	ederal Ad	Exhibite 1	inspection)	arrant wa	s executed	at. (C);(b)(7
T	FA ^{(b)(7)(C);(b)(} transported t)	ae exhibi	its to the SFF	D where he i	processed	them as evi	dena
T	PA later transpor	rted the	expibits to t	he Western	Regional L	aboratory f	or
a	nalysis.				ר		
2. ED	xhibits 1 through 6 was ccesses the kitchen of s	located	on/the porch	near the sli	ding glas	s door whic	'n
a	Cosses the Ritchen of	Salu aups	ess.				
E	xhibit 1 - is alleged Po	eyote Car	etus.				
		(b)(7)(C	C);(b)(7)(F)				
11. DIST	MIBUTIONMARI, ODC					13	DATE
RE	GION						1/3/
							DATE
DIS	STRICT (b)(7)(c)(b)(1					
	(b)(7)(C);(b)(HER D/I 7)(F) Div., SFF	D				//	1/3/
OT			SENSITIVE				
C);(b)(7)(F)			GERGHIVE				
C);(b)(7)(F)	. 6	and the second state of th	EMENT ADMINISTRATION				
c);(b)(7)(F)	This report	DRUG ENFORC	EMENT ADMINISTRATION If the Drug Enforcement Admi committed outside the agency				

U.S. Department of Justice Drug Enforcement Administration

÷ 1		OF INVESTIG Continuation)	ATION	1. FILE NO. (b)(7)(E) 3. FILE TITLE SHULGIN, Alexan	2. <u>G. DEP IDENTIFIER</u> (b)(7)(E)
4.	Page 2 c	of 3			
5. PROGR	RAM CODE			6. DATE PREPARED November 1, 1	994
	Exhibit 2 - is	alleged Per	ote Centus		
	Exhibit 3 - is				
	Exhibit 4 - is				
	Exhibit 5 - is				
1	Exhibit 6 - is	alleged/Peyo	ote Cactus.	$\left(\begin{array}{c} \\ \end{array} \right)$	
NON-DR	UG EXHIBITS:				
None.					
ACTION	ON DEFENDANTS				
1	several alleged which accesses	1 Peyote Cact the kitchen ibits 1 throu	tus in clay pors	, TFA _{)(F)} observe on the porch next of . SHULGIN was not an by the Contra Cost:	to the sliding door rrested pending test
DRUG EI	NFORCEMENT ADMI	INISTRATION:			
2. 3. 4. 5. 5. 7.	G/S S/A S/A S/A S/A IFA S/A D/I Chemist ^{(b)(7)(C);(b)(7}	T)(F			
CALIFO	RNIA DEPARTMENT	OF JUSTICE,	BUREAU OF NARC	OTIC ENFORCEMENT:	
C);(b)(7)(F)					
CONTRA	COSTA COUNTY D	STRICT ATTO	DRNEY'S OFFICE:		
1. 1	Investigator ^{(b)(7}	7)(C);(b)(7)(F)			
DEA Form (May 1980	D) - Ge ⁷)(F)	This report is the p	DEA SENSITIVE ENFORCEMENT ADMIN roperty of the Drug Enfor may be disseminated outs		
			Previous edition may be		

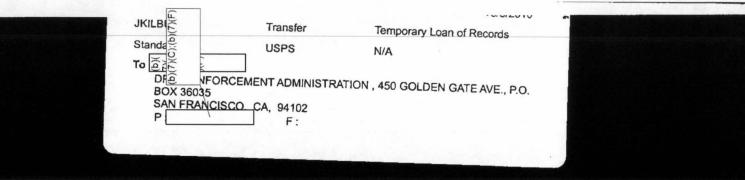
U.S. Department of Justice Drug Enforcement Administration

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			1/b/7//E)
	REPORT OF INVESTIGATION	1 ENENO (b)(7)(E)	2 (b)(7)(E)
	(Continuation)	3. FILE TITLE Alexa	ander
4.			
	Page 3 of 3		
5. PROG	RAM CODE	6. DATE PREPARED November 1, 1	1994
2.	Investigator (b)(7)(C);(b)(7)(F)		
3.	Deputy D.A. (b)(7)(C);(b)(7)(F)		
DETAI			
1. (b (F	helerence is made to DEA-6 File number	(b)(7)(E)	prepared by D/I
2.	On October 27, 1994, at approximately 9:0	an the should ment	ionad afficant aveauta
	a Federal Administrative Inspection Warra		
	CA. because SHULGIN is/a DEA registrant an	disknow to possess	chemicals used to
		7)(C);(b)(b) pbserved in pl	
	alleged Peyote Cactus in clay pots on the accesses the kitchen of said residence.	porch near the sild	ing glass door which
	(b)(7)(C);(b)((b)(7)(C);(b)(7)(F)	C);(b)(
4.	TFA7)(F) contacted TFA TFA7)(F) the clay pots and seized them as evidence		eged Peyote Cactus from
	(b)(7)(C);(b)(/ /	
5.	$D/I_{7}^{(F)}(F)$ debriefed Alexander SHULGIN re	garding the Peyote.	
	SHULGIN was not arrested pending further	investigation	
•	(h)(7)(0)(h)()		
	TFA7)(F) contacted via telephone Deputy	District Attorney)(7)(C);(b)(7)(F) who
	declined to prosecute SHULGIN for possess	ion of the Peyote.	
3.	TFA7/(F) obtained a copy of the Adminis	trative Inspection W	Marrant, dated 10/06/94,
	issued by Magistrate Woodruff of the North		ifornia. A copy of
	this warrant has been placed in this case	file.	
NDEXI	ING SECTION:		
	SULGIN, Alexander: NADDIS #(b)(7)(E)		
•	SOLDIN, Alexander: NADDIS P		
	(b)(7)(C);(b)(7		in the second
DEA For May 198	m - 60 ^(F) DEA SENSITIVE		
190	DRUG ENFORCEMENT ADMIN This report is the property of the Drug Enfo		
	Neither it nor its contents may be disseminated out		

evious edition may be used.

REFERENCE REQUEST—FEDERAL RECORDS C	ENTERS	NOTE: Use a s	separate form for each	ch request.
SECTION I-TO BE COM	PLETED BY REQUES		······	
ACCESSION NO.	AGENCY BOX NUMBE	R RECORDS	CENTER LOCATION NU	MBER
170-03-0001	2 0123	332300 .	332372	
SCRIPTION OF RECORD(S) OR INFORMATION REQUESTED				
Box				
				······
FOLDER (include file number and title) (b)(7)(E)				
stulgia, et	conden			
REMARKS				
			- Norther	
		OTHER (Specity)		
	USE BY RECORDS			
	REMARKS			
RECORDS NOT IN CENTER CUSTODY				
WRONG ACCESSION NUMBER-PLEASE RECHECK			-	
WRONG BOX NUMBER-PLEASE RECHECK				
WRONG CENTER LOCATION - PLEASE RECHECK				
ADDITIONAL INFORMATION REQUIRED TO IDENTIFY RECORDS		······································	- <u></u>	
MISSING (Neither record(s), Information hor charge card found in container(s) specificd)				1
RECORDS PREVIOUSLY CHARGED OUT TO (Name, agency and date):				
				
	DATE	SERVICE	TIME REQUIRED	SEARCHER INITIALS
SECTION III-TO BE COM	PLETED BY REQUES	TING AGENCY		
)(7)(C);(b)(7)(F)	11-7-14	RE	CEIPT OF RECORDS	
Drug Enforcement Administration AGENCY 450 Golden Gate Avc., PO Box 36035 San Francisco, CA 94102	*	Requester please sign, d. filn item(s) llated above. O been checked by the Rec	NLY If the block to right ha	57 16
	:	SIGNATURE		DATE
N 7540-00-682-6423 I-108 PREVIOUS	EDITION USABLE		OPTIONAL FO NATIONAL RECORDS	ARCHIVES A



Standard - Transfill and

Name, Title, Address ((inc	luding ZIP Code)), If applicable)	(b)(7)(E)	(b)(7)(E)	NTIELED
			(D)(/)(E)	
11. 1	- Shulgin	FILE TITLE		
lexande	- 254/9/2	HIE	xsander :	SHULG
~		DATE		
ION / DISTRICT OFFICE		10/	27/94	
our planner or not				
SFFD				
	I hereby acknowledge receipt of th	e following described cash or other ite	m(s),	•
	which was given into my custody b	y the above named individual.		
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(b)(7)(C);(b)(7)(F)		(b)(7)(C);(b)(7)(F)	Type)	
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File ~

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ZCZC00020 112145 R 112145Z JAN 96 FM DEA SAN FRANCISCO FIELD DIVISION TO DEA HQS WASHDC INFO ODD, ODO, AFD, CC BT D E A S E N S I T I V E 00020 ATTN: ODC, SPECIAL TESTING LABORATORY, $OPR_{E}^{(b)(7)(C);(b)(7)(C)}$

6

SUBJECT: SURRENDER OF DEA REGISTRATION, PAYMENT OF \$25,000.00 FINE BY CHEMIST ALEXANDER SHULGIN REF: (b)(7)(E) GDEP-(b)(7)(E) REF TEL 00662, 00621, 0065

1. ON JANUARY 11, 1995, AN INVESTIGATION BY THE DEA SAN FRANCISCO FIELD DIVISION DIVERSION UNIT RESULTED IN THE SURRENDER OF CHEMIST ALEXANDER SHULGIN'S DEA REGISTRATION AND THE PAYMENT OF A \$25,000.00 CIVIL FINE TO SETTLE THE DEA'S CASE AGAINST SHULGIN CITING 52 DRUG VIOLATIONS OF 21 USC 842(a)(5). DEA CHIEF COUNSEL HAD ALSO FILED A SHOW CAUSE ORDER AGAINST SHULGIN'S ANALYTICAL LABORATORY REGISTRATION BASED ON THE SFFD INVESTIGATION. SHULGIN WAS ALSO ORDERED BY EPA TO CLEAN UP HIS LABORATORY AND PROPERTY AND PAY A FINE.

2. ON OCTOBER 27, 1994, THE DEA SFFD DIVERSION UNIT, DEA SFFD CLAN LAB GROUP, ASSISTED BY DEA CHEMIST^{(D)(7)(C),(D)(7)(F)} OF SPECIAL TESTING, THE CONTRA COSTA COUNTY DISTRICT ATTORNEY'S OFFICE, SHERIFF'S DEPARTMENT, FIRE DEPARTMENT AND HEALTH DEPARTMENT WORKED JOINTLY IN SERVING A DEA ADMINISTRATIVE INSPECTION WARRANT AND A CRIMINAL ENVIRONMENTAL HAZARD SEARCH WARRANT ON ALEXANDER SHULGINS' DEA REGISTERED LOCATION/RESIDENCE WHERE SHULGIN MAINTAINED HIS LABORATORY. THE WARRANTS RESULTED IN THE SEIZURE OF SCHEDULE I CONTROLLED SUBSTANCES MESCALINE, PEYONE PLANTS, MDA, MDMA, METHCATHINONE, LSD, 2CB "NEXUS" AND NUMEROUS SCHEDULE I ANALOGS. SHULGIN'S LABORATORY AND SURROUNDING PROPERTY WAS FOUND TO BE CONTAMINATED WITH VARIOUS CHEMICALS INCLUDING MERCURY.

3. SHULGIN HAS AN EXTENSIVE NADDIS RECORD ASSOCIATING HIM WITH CLANDESTINE DRUG MANUFACTURING. IN THE LATE 1960'S SHULGIN WAS RESPONSIBLE FOR THE SYNTHESIS AND INTRODUCTION OF THE CLANDESTINE DRUG STP. SHULGIN HAD HIS DEA RESEARCHER REGISTRATION REVOKED IN 1977 FOR CONDUCTING UNAUTHORIZED RESEARCH, HOWEVER, HE RETAINED A DEA ANALYTICAL LAB REGISTRATION. IN 1991 SHULGIN PUBLISHED A BOOK TITLED "PIKHAL (PHENETHYLAMINES I HAVE KNOWN AND LOVED)" A CHEMICAL LOVE STORY" WHEREIN HE DISCUSSES HIS ABUSE OF CONTROLLED SUBSTANCES AND PROVIDES INSTRUCTIONS TO MANUFACTURE CONTROLLED SUBSTANCES. THE AUGUST 1994 ISSUE OF HIGH TIMES MAGAZINE FEATURES AN INTERVIEW OF SHULGIN THAT NOTES HIS USE AND ABUSE OF

CONTROLLED SUBSTANCES. SHULGIN IS CURRENTLY WORKING ON A SECOND BOULSD.	OK ABOUT
4. THE SAN FRANCISCO DIVISION WOULD LIKE TO ACKNOWLEDGE THE INVALUA CONTRIBUTION OF THE DEA SPECIAL TESTING LABORATORY AND THE FOLLOWING	
$\frac{\text{INDIVIDUALS, DEPUTY}}{(b)(7)(C);(b)(7)(F)} CHEMISTS^{(b)(7)(C);(b)(7)(F)}$	
Y QUESTIONS ON THIS MATTER MAY BE REFERRED TO D/I	OR
INDEXING SECTION: ALEXANDER SHULGIN: NADDIS: (b)(7)(E) BT	
(b)(7)(C);(b)(7)(F) SAC SFFD ~ 00020	

NNNN

U.S. Departm ' of Justice

Drug Enforcement Administration

Washington, D.C. 20537

APR 1 4 1995

IN THE MATTER OF

Alexander Shulgin 1483 Shulgin Road Lafayette, California 94549

(b)(7)(E)

ORDER TO SHOW CAUSE

PURSUANT to Sections 303 and 304 of the Controlled Substances Act, Title 21, United States Code, Sections 823 and 824,

NOTICE is hereby given to afford you an opportunity to Show Cause before the Drug Enforcement Administration, at a place and time to be determined, as to why the Drug Enforcement Administration should not revoke your DEA Certificate of Registration, $\left[\stackrel{[0](7)(E)}{\longrightarrow}\right]$ under 21 U.S.C. § 824(a)(4) and (5), and deny any pending applications for renewal of your registration as an analytical laboratory under 21 U.S.C. § 823(f), for reason that your continued registration would be inconsistent with the public interest, as evidenced by, but not limited to, the following:

- 1. On February 8, 1977, the State of California Research Advisory Panel withdrew approval for your continued research on a marijuana project based on your providing Schedule I controlled substances to a non-registrant as well as without the use of an order form in violation of law and your failure to obtain panel approval for non-marijuana Schedule I drug research. As a result, this action suspended your State authority to conduct research with Schedule I controlled substances.
- Subsequently, on June 9, 1977, the DEA revoked your previous registration, ^{(b)(7)(E)} as a researcher.
- 3. On January 11, 1994, you materially falsified your application for renewal as an analytical laboratory by indicating in your response that your research activity "was abandoned in 1977" and by failing to note in your explanation that your previous State and Federal researcher authority had been suspended or revoked.

This application was approved and you were registered as an analytical lab in Schedules I through V.

On October 27, 1994, during an administrative inspection of your registered location by DEA, you were found to be in possession of six cactus plants which were located on the porch of your residence. These plants were subsequently identified as peyote, which you stated had been received by you as a gift from a member of the Native American Church. You had no records of receipt or written protocols to indicate that these plants were possessed in the course of your registration as an analytical laboratory. Accordingly, you possessed peyote, a Schedule I controlled substance, in violation of 21 U.S.C. § 844.

On September 27, and October 27, 1994, during an a. administrative inspection of your registered location by DEA, you were found to be conducting research involving Schedule I controlled substances, not authorized under, nor coincident to, your analytical laboratory registration in violation of 21 C.F.R. § 1301.22(b)(3) and 21 U.S.C. § 844. You told investigators that you were conducting research, related to the manufacture of therapeutics, with the Schedule I controlled substances 2CB aka Nexus, methcathinone, MDMA, and their analogs. This activity was also in violation of California Health and Safety Code §§ 11401 and 11054-55. You also failed to maintain any records documenting your manufacture of these substances.

5.

b. On September 27, 1994, during an administrative inspection of the area of the registered location described as the laboratory, investigators found 3.42 grams of 2C-B, and 0.9 grams of Methcathinone, both Schedule I controlled You stated that your research substances. involved the use of both substances in experiments conducted with a medical practitioner in San Francisco, and that you transported controlled substances between the two locations. You failed to complete and maintain DEA forms 222 or other records to document these transfers. This activity constitutes a violation of 21 U.S.C. § 841(a)(1). In addition, you also stored numerous controlled substances analogs without the documentation required by the California Health and Safety Code § 11400 et seq.

On September 27, 1994, during an administrative inspection of the area of the registered location described as the Magic Stockroom, investigators found the Schedule IV controlled substance chloral. hydrate. You have no inventory or receipt records for this material.

d. On September 27, 1994, during an administrative inspection of the area of the registered location described as the kitchen, investigators found approximately 200 vials of "reference samples", which you described as containing both controlled and non-controlled substances which you had manufactured yourself. Although the manufacture of such controlled substances may be within the scope of your DEA registration, you tailed to maintain any records of such manufacture as required by 21 C.F.R. § 1304.03.

e. On September 27, 1994, during an administrative inspection of the area of the registered location described as the library/computer room, investigators found on top of a file cabinet a vial labelled "N-Anhydroxy MDMA", plastic bags containing unidentified powder marked with dates and the letters "AD", a commercial package of the Schedule II controlled substance Marinol, and a liquid that you identified as a "homolog" of LSD. You stated that you had no records of the materials stored in this room although subsequent laboratory testing by DEA confirmed the presence of controlled substances.

f. On September 27, 1994, during an administrative inspection of the area of the registered location described as Basement #4, investigators found scattered on a table, various samples and substances ostensibly sent to you for analysis. You stated that some samples that you receive are controlled substances, others are not. You stated that you have not kept a log book documenting receipt of samples for several years. DEA subsequently seized some of these substances and identified them as Schedule I controlled substances by laboratory testing. You failed to maintain any record of receipt or identification for these substances. Furthermore, you had no DEA approval to do anonymous testing and were unable to distinguish whether any controlled substances were received as evidentiary material for analysis. You also identified certain liquid and powder samples as the Schedule I controlled

substance "Nexus" (2CB) and mother liquid of (2CB), which you had synthesized, but for which you had no manufacturing records.

- DEA conducted an analysis of 47 drug exhibits g. seized during the execution of search warrants at your residence. These analyses indicated that four samples were non-controlled, four samples were Schedule I analogs, and thirty-nine samples were Schedule I controlled substances. You had no records of manufacture or receipt for any of these substances. Furthermore, you had no DEA approval to do anonymous testing and were unable to distinguish whether any controlled substances were received as evidentiary material for analysis. You failed to maintain controlled substance receipt records, and manufacturing and destruction records in violation of 21 C.F.R. § 1304.03 and § 1304.27, and 21 U.S.C. § 842(a)(5).
- h. In April 1994, you also failed to properly complete DEA 222 forms for your commercial order and receipt of ethyltriptamine acetate and methylamino propiophenone Hcl, both Schedule I controlled substances.
- i. You conducted human drug research with methcathinone analogs in violation of Federal Food, Drug, and Cosmetic Act, in that you failed to secure an approval for an investigational new drug application (IND) under 21 U.S.C. § 360aa or a new drug application (NDA) under 21 U.S.C. § 355(a), or maintain the required clinical testing records required by 21 U.S.C. § 331(e) and § 355(i), and 21 C.F.R. § 312.
- 6. In June 1991, you ordered and received 50 grams of cocaine, a Schedule II controlled substance, which you synthesized into 2, 3 Anhydroegognine. This product was subsequently sold to the University of California for \$2,785. At that time, you were not registered with the DEA as a manufacturer of controlled substances. Furthermore, under the provision of 21 C.F.R. § 1301.22(b)(4), as an analytical laboratory you were authorized to manufacture substances as a coincident activity only for analytical or instructional purposes and not for distribution. You provided no records to indicate that this substance was transferred to another DEA registrant for analytical or instructional purposes.

The following procedures are available to you in this matter:

1. Within 30 days after the date of receipt of this Order to Show Cause, you may file with the Administrator of the Drug Enforcement Administration a written request for a hearing in the form set forth in Section 1316.47, Title 21, Chapter 2, Code of Federal Regulations. (See Section 1301.54(a)).

2. Within 30 days after the date of receipt of this Order to Show Cause you may file with the Administrator a waiver of hearing together with a written statement regarding your position on the matters of fact and law involved. (See Section 1301.54(c)).

3. Should you decline to file a request for a hearing or should you so file and fail to appear at the hearing, you shall be deemed to have waived the hearing and the Administrator may cancel such hearing, if scheduled, and may enter his final order in this matter without a hearing and based upon the investigative file and the record of this proceeding as it may then appear. (See Sections 1301.54(d) and 1301.54(e)).

Correspondence concerning this matter should be addressed to the Hearing Clerk, Office of Administrative Law Judges, Drug Enforcement Administration, <u>Washington, D.C.</u> 20537.

> Deputy Assistant Administrator Office of Diversion Control

cc: Hearing Clerk Office of Administrative Law Judges

bcc:	Mr. Mr. Mr.	(b)(7)(C));(b)(7)(F)	OD ODO ODO	C		
	Le/s	(b)(7)(C)	;(b)(7)(F)				
	DEA	San	Franc	isco	Field	Division	

DRUG ENFORCEMENT ADMINISTRATION CLANDESTINE LABORATORY TASK FORCE OPERATION PLAN (b)(7)(E)				
Date: 10/07/94 Ca	se (G-DEE	Atle: Shugh	
NATURE OF OPERATION				
Search Warrant: X Buy	/Bust: Buy/Walk:	Surveillance: Cor	trolled Delivery:	
Other: ADMINISTRE	THE INSPECTIC	w		
LOCATION				
Address: 1483 SHUL	GU RD	City: LAFAYETTE	2	
Directions: HWY 24	EAST, PLENGAUT	HILL PO EXIT > P	ROCEED NORTH	
RON SHULGUE	20			
LOCISTICA. CONTR	A COSTA DA TO	D)(7)(F) STRATIVE INSPECT SERVE RODITOLAU ABORATORY ALO C	. WARRAUT.	
U/C AGENT #1				
Name: NA	Radio #	Age:	Sex:	
Hgt: Wt:	Hair: Ey	es: Glases :	Facial Hair:	
Clothing:				
Vehicle: Make:	Model:	Year:	Color:	
License #:				
Comments/Other:				

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U/C AGENT #2	ł		(
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Comments/Other:				
INFORMANT #1				
Name/Number: NA	Present	at Briefing:	Age:	Sex:
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Clothing:				
Vehicle: Make:			Year:	Color:
License#:				
Comments/Other:				
DIRODMANT 42				
INFORMANT #2	Broomt	at Prioficat	1000	Same
Name/Number: NIA				Facial Bair:
		Eyes:	Glasses:	
lothing:		Ψ	6-1	
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Comments/Other:				
	AND AN			
SUSPECT #1				
Name: <u>PLEXAUDER</u>				
Hgt: <u>6-3</u> Wt: <u>200</u>	<u>D</u> Hair: <u>GRGY</u>	Eyes: BRU	Facial Ha	ir: <u>beard</u>
Unique Physical Charact	eristics:			
CA. DL	10743/01	2.01000		
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Address: 1483 SI	huld J RD	CI : LAFA	IEITE
Clothing:			
Weapon(s):	KUOLN	History of Violence:	NO
Vehicle: Make	: Model:	Year:	Color:
License #:	· · · · · · · · · · · · · · · · · · ·		
Comments/Other:			
SUSPECT #2			
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lothing:			
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USPECT #3			
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lique Physical Cha	aracteristics:		
kiress:		City:	
othing:			·
eapon(s):		History of Violence:	
hicle: Make: _	Model:	Year:	Color:
lcense#:			

COMUNICATIONS

<u>MINIMUM</u>	
Primary Radio Channel:	
Verbal Arrest Signal: NA	
Visual Arrest Signal: NA	
Buergency Signal: NIA	
Time of Briefing: <u>3:00AM</u>	
Location of Briefing: PARKING LOT - REASPLT HILL RD HILLY	NEW LN.
Municipal/County Jurisdiction: CONTRA COSTA COUNTY	
Name of Watch Commander Notified: (0. CO. SHERIFF	Time:
Name of Task Force Commander: (b)(7)(C);(b)(7)(F)	_ Time:
Local Participation: YES	
LABORATORY PROCESSING/CLEAN-UP	
Chemist(s): (b)(7)(C);(b)(7)(F) - DEA SPECIAL TESTING LAB.	
Chem Waste Management Notified:	Time: 10/25/94-500P
Site Safety Officer: (b)(7)(C);(b)(7)(F)	
Lab Truck: (b)(7)(C);(b)(7)(F)	
Fire Dept. Notified: CO. CO. FIRE DEPT	Time: (au scaue)
Health Dept. Notified: CO.CO. HEALTH DEPT.	Time: (a) SCENE)
ASSIGNMENTS	

Name	Radio #	Assignment
(b)(7)(C);(b)(7)(F)	(b)(7)(E)	GIS
2.		VIDED -ASSIST CHER
3.		SITE SAPETY - LUL'B'
4.		ASSIST CHEMIST
5.		LNL 'B'
_6.		ASSIST CO. HEATH
7.	DED - CHOM (b)(7)(E)	IIST
8.		

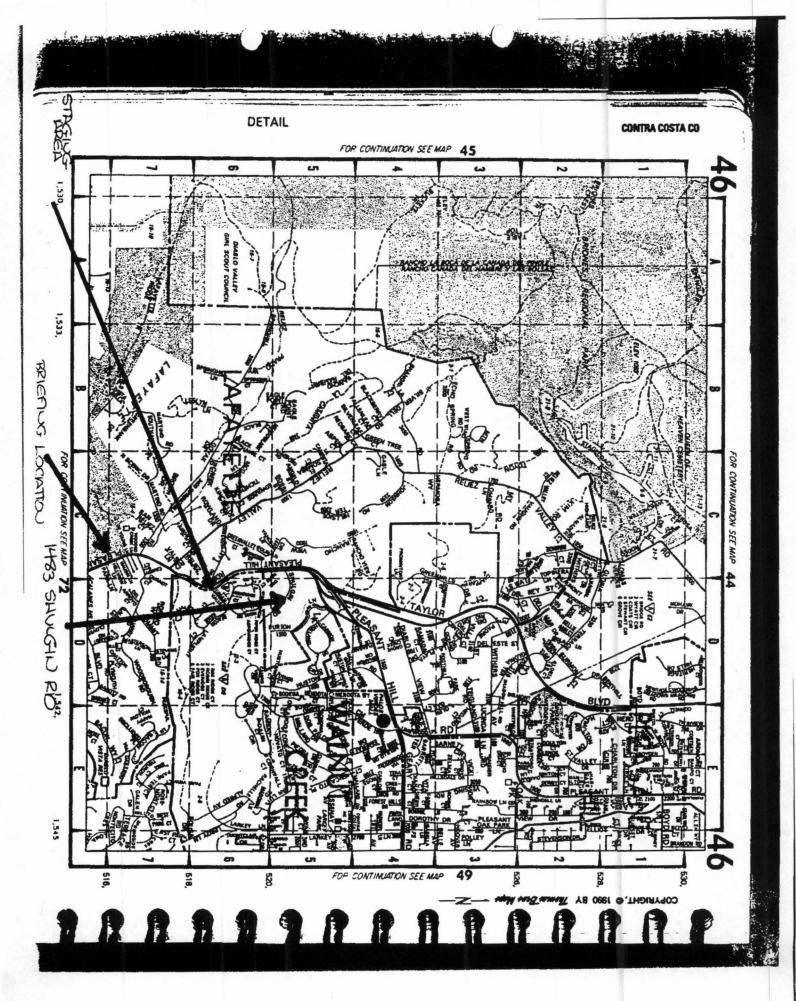
(b)(7)(C);(b)(7)(F)	(b)(7)(E)	Assignment
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18.	······	
EPORT ASSIGNMENTS		
urveillance:	Arrest:	
vidence:	Search:)(7)(C);(b)(7)(F)
/C:	18-14	
earest Hospital: DHU	MUIR HOSPITAL	-
ddress: 1601 YGKINCIO U	DALLEY RD. LAWY ORGO	6 Phone: 512-939-3000
USA Assigned:		Phone:
peration Plan Approved:		
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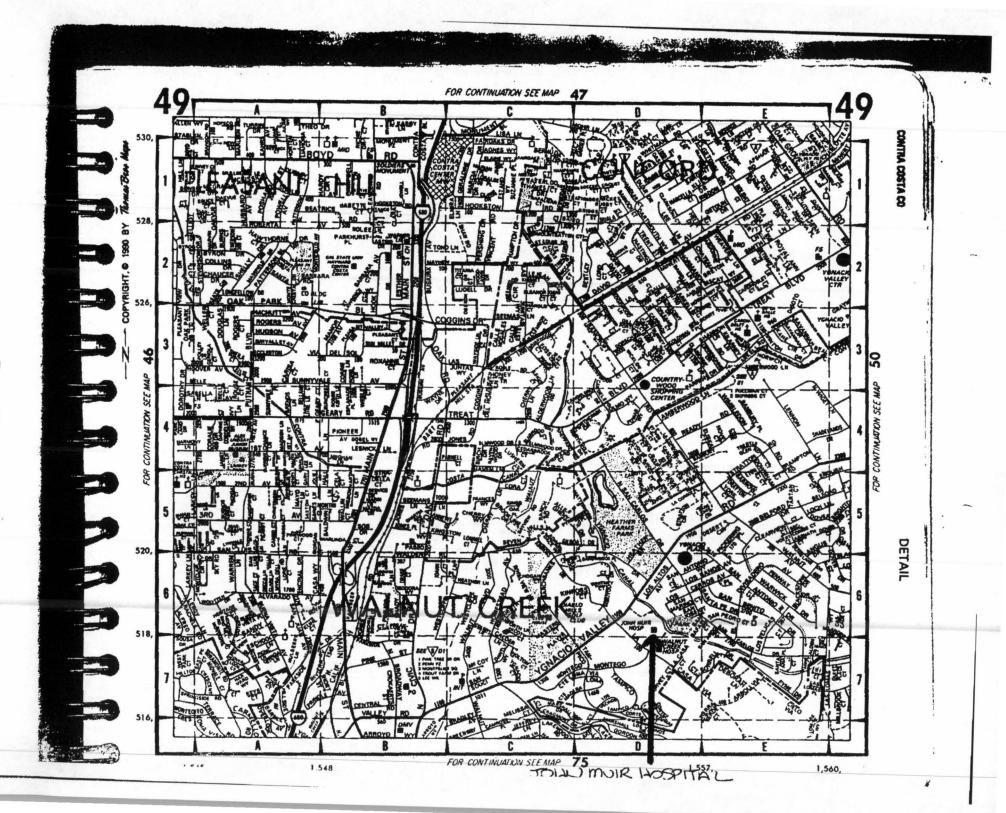
ON 9/27/94, AGENTS FROM SEFTO EXECUTED AN ADMINISTRATIVE INSPECTION UNPRALT AT SAVIGINS RESIDENCE LOCATED AT 1453 SAVIGIN RD., LAPAYETE, WHILE INSPECTING SAVIGINS LABORATORY, A CEMENT STRUCTURE LOCATED BEHIND THE MAIN RESIDENCE, AGENTS LOCATED A NUMBER OF CHEMICALS, APPARATUS AND CONTROLLED SUBSTRUCES. ALL OF THESE MATERIALS SHOWD BE CONSIDERED HARAPOONS. IN ADDITION THE CONFIDED NATURE OF THE LABORATORY AND DETACHED STORAGE SHED ALSO OPERATE A POTENTIALLY DRUGEROUS SITUATION.

THE INITTAL INSPECTION TEAM WILL SURVEY THE LOCATION IN ORDER TO IDENTIFY POTENTIAL HAZAROS. THIS TEAM WILL BE EQUIPPED WITH IN GAS AR DETECTOR TO IDENTIFY POTENTIAL OXYGEN PROBLEMS IN AND REALD THE LABORIATORY. AN EMPRECISCY ENACULATION TEAM OF AT LEAST TWO AGENTS WILL STAND BY IN LEVEL'S' PROTECTION WHILE THE SITE INSPECTION IS IN PROGRESS. ONCE ALL POTENTIAL HAZARDS INANG BEEN IDENTIFIED, THE LABORATORY WILL BE SECURED AND PROCESSED AS IN CRIME SCENE INS REZ DEA ROUCT.

MATERNATS LILL BE MADE TO STABILIES THE LABORATORY BEFORE ANY INDIVIDUALS GJERTHE LOCATED TO PROCESS THE SCALE. THESE EFFORTS MAY INDIVOE VEJTLATED, STABILIZATED OF QJEON G CHEMICAL REPETIDIS, ILLUMINIATION, GTC. FIRE AND EMERGENCY MEDICAL RESISTANCE WILL BE ON SCADE IN THE CASE OF EMERGENCY

AND ESSENTIAL POPEDINGL WILL BE ALLONGO TO GUTER THG LABORRORY ONCE THE SEENS HAS BEEN SEENED. THOSE WHO ARE NEEDED IN THE LABORATORY WILL BE INSTRUCTION SO BY THE





Page 37

(b)(7)(E)

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT

OF CALIFORNIA

3.94#30582

NFIN

IN THE MATTER OF THE ADMINISTRATIVE INSPECTION OF

ALEXANDER T. SHULGIN ANALYTICAL LAB DEA REGISTRATION ^{(b)(7)(E)} 1483 SHULGIN ROAD LAFAYETTE, CA 94549 WARRANT FOR INSPECTION

To Diversion Investigator (b)(7)(C);(b)(7)(F) and any other duly authorized investigator or agent of the Drug Enforcement Administration of the United States Department of Justice.

Application having been made and probable cause as defined by Section 880(d)(1), Title 21, United States Code having been shown by the affidavit of Diversion Investigator ^{(b)(7)(C);(b)(7)(F)} of the Drug Enforcement Administration for an inspection of the controlled premises of Alexander T. Shulgin, 1483 Shulgin Rd., Lafayette, CA 94549 and it appearing that such inspection is appropriate pursuant to Section 880, Title 21 of the United States Code.

Therefore, pursuant to Section 880, Title 21 of the United States Code, you are hereby authorized to enter the abovedescribed premises during ordinary business hours and inspect in

1

a reasonable manner and to a reasonable extent, including the collection of samples if necessary, all finished or unfinished controlled substances on the premises, all pertinent equipment, records, files, reports, official order forms, and documents required to be made, kept and maintained under the provisions of the Controlled Substances Act, 21 U.S.C. 800, <u>et seq.</u>, and the Controlled Substances Import and Export Act, 21 U.S.C. 900, <u>et seq.</u>, for the purpose of verifying that said records, files, official order forms, reports, documents and controlled substances are properly kept and maintained.

You are hereby further authorized to seize from the abovedescribed controlled premises such of the following records, reports, documents, files and inventories as are appropriate to the effective accomplishment of the inspection and for the purpose of copying or verifying their correctness or that are used or intended to be used in violation of the Controlled Substances Act:

- (1) Controlled Substance Inventory Records.
 - (2) Records documenting the receipt of controlled substances including DEA order forms, shipping and receipt records.
 - (3) Records documenting the manufacture and, distribution of controlled substances.
 - (4) Any other records or reports required to be maintained by the Drug Enforcement Administration.

2

A prompt return shall be made by the inspecting officers to the undersigned magistrate, showing that the inspection has been completed and accounting for all property seized pursuant to this warrant, not later than 10 days from the issuance of this warrant.

weln EWoon

Magistrate United States District Court for the Northern District of California

Dated: 10/26/94

	ALLACIBURY, M C
<u>}</u>	(b)(7)(E)
	ORIGINAL
	FILED
1	SEP 26 1994
2	RICHARD W. WIEKING
3	CLERK, U.S. DISTRICT COURT
	KORTHERN DISTRICT OF CALIFORNIA
5	
6	
7	UNITED STATES OF AMERICA
8	NODWINDN DIOWDION ON ON TRODUCT
0	NORTHERN DISTRICT OF CALIFORNIA
9	ADMINISTRATIVE INSPECTION OF) Magistrate's Docket No.
10) Case No
11	ALEXANDER T. SHULGIN) ANALYTICAL LAB) AFFIDAVIT FOR ADMINISTRATIVE
	DEA REGISTRATION (b)(7)(E)) <u>INSPECTION WARRANT</u>
12	1483 SHULGIN ROAD) LAFAYETTE, CA 94549)
13	
14	
15	The undersigned, being duly sworn, deposes and says:
	That the affiant, $(b)(7)(C);(b)(7)(F)$ is a duly appointed
16	Diversion Investigator of the Drug Enforcement Administration,
17	United States Department of Justice, assigned to the San
18	
19	Francisco Divisional Office.
	Pursuant to Sections 878(2) and 880(b)(1), (2), and (3),
20	Title 21, United States Code, and Section 3, Appendix to Subpart
21	R, Title 28, Code of Federal Regulations, your affiant is
22	
23	authorized to execute administrative inspection warrants for the
	purpose of inspecting controlled premises of persons and firms
24	registered under the Controlled Substances Act (21 U.S.C. 800 et
25	seq.) in order to inspect, copy and verify the correctness of all
26	
1	records, reports and other documents required to be kept or made

under Section 827, Title 21 of the United States Code and Section
 1304.01 et seq., Title 21, Code of Federal Regulations.

3 Alexander Shulgin is registered under the provisions of the Controlled Substances Act, Title 21, United States Code, Section 5 823 et seq., as an Analytical Laboratory and has been assigned DEA registration number ((b)(7)(E) in Schedules I through V, and 7 is doing business at his residence, 1483 Shulgin Rd., Lafayette, 8 CA. That said place of business is a controlled premise within 9 the meaning of Section 880(a), Title 21 United States Code and Section 1316.02(c), Title 21 Code of Federal Regulations: 10

Alexander Shulgin is required to keep complete and accurate
records of all controlled substances received, manufactured,
sold, delivered or otherwise disposed of by him pursuant to 21
U.S.C. 827 and 21 C.F.R. 1304.01 et seq. and specifically 1304.27
"Records for Chemical Analysts" on the controlled premises.

The Affiant has examined the files and records of the Drug
Enforcement Administration and has learned that in 1970 Alexander
Shulgin applied for and was granted a DEA Analytical Laboratory
Registration to handle controlled substances at his residence,
1483 Shulgin Rd., Lafayette, CA, in Schedules I-V as is described
in 21 CFR 1301.22(b)(4) as follows:

 A person registered or authorized to conduct chemical analysis with controlled substances shall be authorized to manufacture and import such substances for analytical or instructional purposes, to distribute such substances to other persons registered or authorized to conduct chemical analysis or
 instructional activities or research with such substances and to persons exempted from registration

AFFIDAVIT

-2-

pursuant to Section 1301.26, to export such substances to persons in other countries performing chemical analysis or enforcing laws relating to controlled substances or drugs in those countries, and to conduct instructional activities with controlled substances. Alexander Shulgin currently maintains a Schedule I-V Analytical Lab Registration.

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S The DEA files also show that in 1971 Alexander Shulgin 6 applied for and was granted a DEA Researcher registration 7 authorizing him to handle Schedule I controlled substances at his 8 residence which is described in 1301.22(b)(3) as follows:

A person registered to conduct research with a basic class of controlled substance listed in Schedule I. shall be authorized to manufacture or import such class if and to the extent that such manufacture or importation is set forth in the research protocol described in Section 1301.33 and to distribute such class to other persons registered or authorized to conduct research with such class or registered or authorized to conduct chemical analysis with controlled substances.

In 1977 the DEA revoked Alexander Shulgin's DEA Schedule I 15 Researcher Registration based on the following. On February 8, 16 1977 the California Research Advisory Panel notified Dr. Shulgin 17 that it had withdrawn it's approval of all Schedule I controlled substance research projects being conducted by him. This action was prompted by the fact that Alexander Shulgin supplied a Schedule I substance Mescaline to a non-registered individual and because Alexander Shulgin had undertaken research projects involving Schedule I controlled substances without first obtaining authorization from the California Research Advisory Panel. In addition, Alexander Shulgin, who is not an MD, has administered Schedule I drugs to humans (discussed in published AFFIDAVIT -3articles that he has authored) without obtaining an IND from the
 Food and Drug Administration. See attached letter from
 California Research Advisory Panel dated February 8, 1977
 advising Dr. Alexander Shulgin of the Panel's decision to
 withdraw his Schedule I Research Authority.

A review of DEA records reveal that in 1985 the DEA received
information suggesting that Dr. Shulgin was involved in the
illegal manufacture of designer drugs. In order to follow-up,
the DEA interviewed Dr. Shulgin at his residence where he
maintains his DEA registration and laboratory. No action was
taken against Dr. Shulgin and the case was closed.

On April 22, 1992, DEA Investigators visited 1483 Shulgin
 Road, Lafayette, California. The Investigators met with Dr.
 Shulgin and his wife^{(b)(7)(C)} to discuss his handling of LSD samples.
 No action was taken against Dr. Shulgin and the case was closed.

In February 1994, the Affiant reviewed the book <u>PIHKAL</u>
(Phenethylamines I Have Known and Loved), A Chemical Love Story,
Copyright 1991, Authored by Alexander Shulgin and his wife^{(b)(7)(C)}
Phenethylamines are Hallucinogenic chemicals. An excerpt of the
book's foreword reads,

"For nearly thirty years one of the authors, Dr. Alexander Shulgin, affectionately known to his friends as Sasha, has been the only person in the world to synthesize, then evaluate in himself, his wife^{(b)(7)(C)} and in a dedicated group of close friends, nearly 200 never-before known chemical structures, materials expected to have effects in man similar to those of the mind altering psychedelic drugs, mescaline, psilocybin and LSD".

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AFFIDAVIT

-4-

The book generally describes the unauthorized manufacture,
 abuse and distribution of Schedule I controlled substances and
 their analogues.

In July 1994, the Affiant learned that Dr. Shulgin and his
wife^{(b)(7)(C)} were featured in a August issue of "High Times"
magazine interview, where the Shulgins discuss their unauthorized
use and distribution of hallucinogens, specifically Schedule I
MDMA commonly known as Ecstacy. See attached "High Times"
article.

10 Title 21 Section 880 defines probable cause for the issuance
11 of an Administrative Inspection Warrant.

For the purposes of this section, the term probable cause means a valid public interest in the effective enforcement of this subchapter or regulations thereunder sufficient to justify administrative inspections of the area premises, building, or conveyance, or contents thereof, in the circumstances specified in the application for the warrant.

As outlined above, there is a valid public interest for DEA
to inspect Dr. Shulgin's records: 1. Dr. Shulgin is a DEA
registrant; 2. There has been previous information of possible
unauthorized use; 3. There have been recent public statements by
Dr. Shulgin suggesting unauthorized use of controlled substances.

The affiant further represents that the need for the inspection of Alexander Shulgin's DEA registered location and the need for verifying the correctness of inventories, records, reports, and other documents required to be kept under the Controlled Substances Act and the need for verifying the security

AFFIDAVIT

-5-

provisions utilized by the registrant in storing and handling
 controlled substances result from a valid public interest in the
 effective enforcement of the Controlled Substances Act and
 implementing regulations.

5 The affiant further states that the inspection will be 6 conducted within regular business hours, and that the 7 Investigator's credentials will be presented to the registrant, 8 and that the inspection will begin as soon as practicable after 9 the issuance of the warrant and will be completed with reasonable 10 promptness and that the warrant will be returned within 70 days.

11 The affiant further states that the inspection will extend 12 to the inspection and copying of inventories, records, reports, order forms, invoices, and other documents required to be kept 13 and the inspection of all other things therein including records, 14 15 files, and papers appropriate for the verification of the records, reports, and documents required to be kept under the 16 Controlled Substances Act. The inspection will also extend to 17 18 the inspection and inventory of stocks of controlled substances, 19 finished or unfinished substances and pertinent equipment 20 associated with the storage and handling of controlled 21 substances, and if necessary any applicable records and/or samples of controlled substances will be seized. 22

The affiant will be accompanied by one or more Investigators
or Agents who are employees of the Attorney General authorized to
conduct administrative inspections.

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AFFIDAVIT

-6-

A return will be made to the Magistrate upon the completion of the inspection. The affiant further states that he has verified and has knowledge of the facts alleged in this affidavit, and that they are true to the best of his knowledge. (b)(7)(C);(b)(7)(F). Drug Enforcement Administration Sworn to before me and subscribed in my presence on this $\frac{2}{1004}$ day of Sent. . United States Magistrate 44-(b)(7)(C);(b)(7)(F) AFFIDAVIT -7-(b)(7)(C);(b)(7)(F)

VIO A. GERMAN, PH D. TREDE FASAL, M.D. E. MCDERMOTT, JR. IDERICK MEYERS, M.D. INFORS G. ROSSITER, M.D.

SON J. DOW, PHARM.D.

15) 557-1325

STATE OF CALIFORNIA



RESEARCH ADVISORY PANEL 6000 STATE BUILDING SAN FRANCISCO. CALIFORNIA 94102

February 8, 1977

Alexander T. Shulgin, Ph.D. 1483 Shulgin Road Lafayette, California 94549

> Re: Revised Application #7739 -"The Biosynthesis of Marijuana Components"

Dear Doctor Shulgin:

Reference is made to your amended research protocol, dated December 7, 1976, which was submitted in response to the Panel's letter of November 23, 1976. The Panel has reviewed the material you have submitted and is unable to approve your protocol because of its major deficiencies.

Moreover, in view of violation of the controlled substances act and failure to obtain Panel approval for recently completed non-marijuana Schedule I drug research, the <u>Research Advisory Panel hereby withdraws its approval of your</u> <u>marijuana project - "The Origin and Potencies of Marijuana,"</u> which was authorized in March 1970. Thus, it should be noted that henceforth you do not have authorization to conduct research with any Schedule I controlled substances in the State of California. The Drug Enforcement Administration is being apprised of this action by a carbon copy of this letter. The detailed findings of the Panel's review are presented below.

Supplying of a Schedule I controlled substance to a non-registered individual and without an official order form.

It has come to the Panel's attention that you supplied mescaline for a research project at the University of California at San Diego. This Schedule I substance was supplied to nonregistered individuals and without an official federal order form. You are well aware of the State and Federal statutes and regulations, including the need for prior Research Advisory Panel approval of research protocols involving mescaline and Alexander T. Shulgin, Ph.D. -2-

other hallucinogenic drugs. This deliberate violation of the law (c.f. Hadorn, D. et al, <u>Behavioral Biology 17</u>: 403-9, 1976, footnote #1) leaves the Panel with serious questions about the propriety of your handling of drugs with abuse potential.

Conduct of Schedule I drug research (other than marijuana) without Panel approval.

Along with your brief amended research application for marijuana, you submitted an extensive bibliography. Some of the recent publications (e.g., <u>Pharmacology 10</u>: 12-18, 1973; <u>Neuropharmacology 14</u>: 165-74, 1975) report research work with Schedule I hallucinogenic substances that has never been submitted to the Panel, nor approved by this body as required by State law. Your published activities document violation of State laws regarding controlled substance research.

A further aspect of this violation is the unauthorized use of human subjects for research with a investigational new drug. Since this matter is primarily the concern of the Federal Food and Drug Administration, a copy of this letter is being forwarded to FDA for follow-up and appropriate action.

Failure to submit an annual report for 1976.

In its letter of November 23, 1976 the Panel requested that you submit an annual progress report of your research project. Annual reports, as in the past, were due by December 31st. No report was received from you by, nor since, the deadline. This report is still required, but rather than a progress report it should be a comprehensive final project report. Pursuant to Section 11480 of the California Health and Safety Code the nature of research projects and their conclusions are to be reported to the State legislature.

Deficiencies in amended protocol.

The deficiencies in the amended research protocol are referred to by section number.

2.b The purpose of the experiment is unnecessarily vague with regard to "several of the organic chemicals which are present in the intact plant." You must specify which substances. you are interested in studying. Moreover, the scientific merit of this proposed investigation is not clear from your protocol. What is the value of such a study?

2.c In the protocol you indicate that you are uncertain whether tetrahydrocannabinol or cannabinol will be needed, and that you have these substances on hand anyway. It is Alexander T. Shulgin, Ph.D.

required that the amounts of these substances that are on hand be reported.

Narijuana will be planted, grown and harvested as part of this experiment. You have not provided estimates of yield of psychoactive or potentially psychoactive substances. The protocol is vague as to how much marijuana will be grown. You have not disclosed the source of the seeds. Also required is your current inventory of seeds, growing plants, harvested plant parts, and extracted resin material.

-3-

2.d It is required that your capabilities for characterization of the tetrahydrocannabinols and their sulfur analogs be described. This information is applicable.

2.e The description of the facilities is cursory and inadequate. A floor plan of the chemical laboratory is required and a full description of the equipment therein contained (if not included in 2.d above). Where will the marijuana plants be grown?

2.f It is not sufficient to state that the storage facilities for the controlled substances are DEA approved. The storage arrangements must be described. Regarding the inventory of controlled substances, the precise information recorded in your laboratory notebook, including documentation of use, must be described in the protocol.

Summary.

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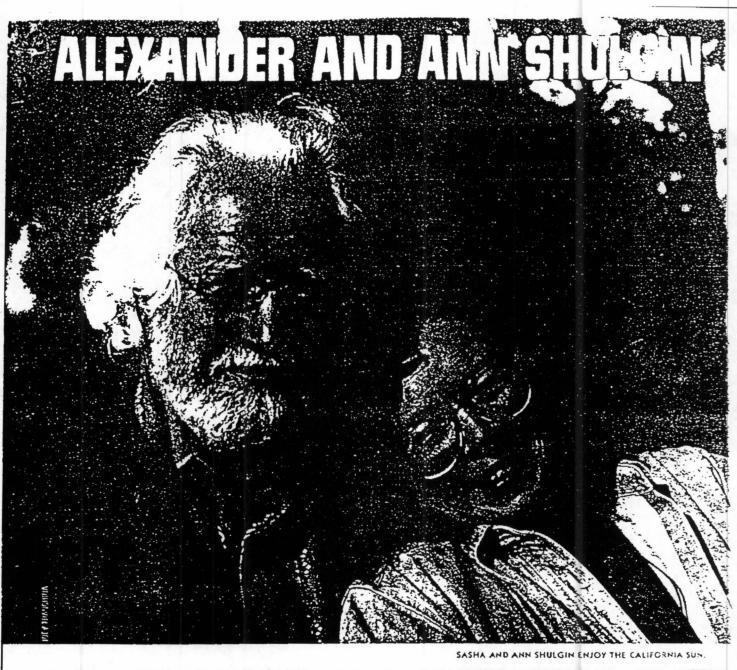
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It is the Panel's policy that anyone can apply to the State to conduct specific research projects with Schedule I controlled substances and, moreover, that applicants who have had their approvals withdrawn can reapply. In addition to following the requirements and procedures of the Panel, should you wish to resubmit an application, it would be required that you submit a protocol for <u>all</u> of your research with Schedule I drugs, and that you provide a suitable explanation for the publicly disclosed violations cited above.

It is required that all Schedule I controlled substances held for research purposes be turned over to the Drug Enforcement Administration at this time for disposition. If you intend to reapply to the Panel, your supplies of Schedule I controlled substances may be held until final action is taken on your reapplication, or until June 30, 1977, whichever comes first.

	Very	truly	you	rs,
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Alexander Shulgin is a longstanding, wellrespected UC Berkeley research chemist and professor of pharmacology. In his governmentlicensed research lab—which looks dramatic enough to be the set for a Hollywood movie about a mad scientist—he has spent the last 30 years discreetly, yet legally, designing hundreds of new psychoactive compounds, particularly psychedelics. Along with his wile Ann and a small, dedicated research group, they sample each new drug as they're developed.

 Through the cautious escalation of dosage, they discover and map out the range of each new drug's effects, experimenting with its psychological and spiritual potential. Most of Dr.
 Shulgin's psychoactive designer molecules are unknown to the public, but a few, such as 2CB and DOM-better known as STP-have received wide-spread distribution. Additionally, he is largely, though indirectly, responsible for the widespread popularity of Ecstasy.

Alexander and Ann Shulgin are the authors of the underground best-seller PIHKAL: A Chemical Love Story, the title of which is an acronym for "Phenethylamines I Have Known and Loved." The book tells in novel form how both Alexander [known to his friends as Sasha] and Ann Shulgin came to their fascination with psychedelics and with each other, and provides chemical recipes for the compounds with which Dr. Shulgin has worked.

Their research continues to this day and a new book, TIHKAL (Tryptamines I Have Known and Loved) is on the way.

Page 51 1 C . . - T

BY REBECCA MCCLEN NOVICK AND DAVID JAY BROWN

INTERVIEW

HT: How did you first start designing drugs, and from where do you draw the courage to take unknown substances into your body?

Alexander: It doesn't take that much courage. We're not foolish. You don't take a teaspoonful to see if you burp. You start out with a reasonable estimate of what you think might be an effective level and you divide that by whatever number your wisdom and judgment tells you.

HT: Nonetheless, you're still venturing off into the unknown.

Alexander: Admittedly the first time is an unknown, but you start with a level where it would be hard to believe it would have an effect. Almost never are you surprised, and when you are surprised you learn from it.

Ann: What takes real courage is being on the street or at a rave and somebody gives you a little packet of something and it doesn't say what it is or how much it is.

HT: Well some people would call that stupidity rather than courage.

Alexander: People call what I do stupid too. But I know what I have and I know its purity and I know I can make it a second time.

HT: What was it that inspired you to write PIHKAL?

Alexander: I was inspired partly by the history of Wilhelm Reich. I discovered that in his very last years he got into very unusual Ann: And I couldn't imagine him writing all that fun stuff without my help. What I wanted to do was bring in the personal which he failed to do—marriage, kids, love, soup—everyday reality. Our feeling about psychedelics is that if you use them the right way, they enrich your everyday life. You learn to think a different way about the ordinary things you see.

HT: Was there any response from the Drug Enforcement Administration to it? Particularly since you included recipes... Alexander: One of the things I did was to send a copy of the book to people within the DEA with covering phrases like, "Here's a book that will provide you with a lot of information which may be useful to you."

Ann: They loved it. One of the higher administrators of the DEA in Washington said, "My wife and I read your book and it's great!"

HT: Sasha, how did you become a chemist?

Alexander: My doctorate degree is in biochemistry, but I found that it didn't have the magic and the music of chemistry. Chemistry is an art, it's a style of thinking. Orbitals are for mathematicians, chemistry is for people who like to cook!

HT: What do you find drugs do for you? Alexander: Drugs do not do things, they allow you to do things. It's not an imposition from the outside. People tend to say, "What did that drug do?" or, "I took a drug and it did such and such." In each instance even at the grocery store. Now there's a thought!

HT: Have you found that certain drugs have an individual character to them—a tendency to bring out a particular aspect of the psyche?

Ann: Each drug has a physical effect, and how my own individual chemistry and metabolism uses that drug might be quite different than how someone else's body uses it.

HT: What therapeutic value have you found for the drug MDMA—Ecstasy? Ann: The most valuable effect of MDMA is that it enables insight. The patient or the client may regard the possibility of having insight into himself as a very threatening thing. One of the problems that most human beings suffer from is the suspicion that their core essence is a monster. There is this terrible fear that when you get down to it, the essential you is going to be discovered to be a rotten little slime-bag.

MDMA, in some way we don't yet understand, removes that fear. It allows you not only to take a really deep look at who you are but to show you that you're a combination of angels and demons and that they're all valid.

Apart from the removal of the fear, there is also a kind of good-humored acceptance that this drug allows you to feel. There is a validation of the self which is a miraculous and marvelous thing to experience. MDMA does not remove common sense caution—you still don't cross the road at the red light—but this deepseated fear is gone.



and not totally acceptable areas of hypotheses, such as making rain fall by means of electrostatic guns and other such ventures.

The FDA filed a lawsuit against him for promoting radical equipment that had not been approved by them. They put him in jail and he died there. After his death the FDA took all his lab books and papers and burned them. One of the reasons I wrote PIHKAL was because I could see the need to get a lot of information that had not been published into a form that just could not be destroyed. this is giving up your power to an inert white solid. The drug catalyzes and facilitates but it doesn't do things. That puts it in perspective. You don't have to give credit to a drug.

HT: It also encourages the person to take responsibility...

Alexander: Completely. You can't live without that. Look at yourself in the mirror, it's a good catharsis. It's me and the drug. It's a relationship which is available to everyone. Everybody has the possibility of going into some sort of ecstatic experience, at any time, without drugs perhaps It is also an extraordinary tool for discovering repressed memories. When I was doing therapy, a great many of our patients were female professionals in the child-abuse field. A great many of them had gone into the field not knowing that they themselves had been sexually abused as children. MDMA brought out these memories. It's a tremendous uncoverer, but with the uncovering is a gentle, compassionate validation and acceptance.

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One of the things I want to do in our next book, TIHKAL, is to write about psychotherapy with psychedelics.

INTERVIEW . SHULGIN

I've used the phrase that MDMA is penicillin for the soul, because that is exactly the way therapists feel about it. It is already used legally in therapeutic settings in Switzerland.

HT: Not all substances produce such feelings. Some, in fact, like PCP, seem to trigger dark sides. Is there any drug that could turn the Dalai Lama into a sociopath?

Ann: I suspect that the Dalai Lama has developed his own consciousness sufficiently that he is already acquainted with this animal. During psychedelic therapy, you eventually have to go to the monster and get to know it. The Jungians go as far as getting a good look at it and accepting that it's there. What we do is, we go into it and *look out of its eyes* so that we become it.

The worst terror I think a human being can experience is when he or she is facing doing that, because we're all afraid that we're going to get stuck in the demon. What you have to realize is that you have already made your choices of what side you're going to be on in this life, whether you're going to be a nurturing person rather than a destroyer and so on.

Once you get inside the demon, the first thing you experience is the absolute lack of lear and then you begin to recognize that this is also the survivor aspect of yourself. There's a part that takes care of you. Then it begins to transform, and you recognize its quality of total selfishness it's going to take care of you and nobody else, right?—but it is your ally. And then you begin to recognize its positive aspects.

HT: That's interesting, because part of the therapeutic process for people with multiple personality disorder involves an understanding that each personality has a particular function.

Ann: Absolutely. This is why I believe that all psychedelic use, even if it's at a rave, is part of a spiritual search. My suspicion is that psychedelics are going to be accepted only when they are seen as tools for spiritual development. But the trouble is that the West basically treats the unconscious as the enemy—as if only an ax-murderer will be found in there!

HT: Because drug use can present seri-

- ous problems, every society needs a well-
- thought-out drug policy. What kind of drug policy do you envision for a tolerant
- society of the future?
- Alexander: The first thing that has to hap-

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pen here in America is that the laws will

have to change. But to do that is going to require honest education and distribution of information about drugs and their actions. The term 'abuse' is used nowadays to mean any use of any drug of which you don't approve.

HT: What are your thoughts on harm reduction?

Alexander: It's problematic. One of the reasons you can't rationally pinpoint harm reduction is because you cannot measure harm. What is the harm of a person using a drug which is not approved of by society? To one person—trivial, to another person whose son has just died from an overdose—immense.

I THINK ANYTHING THAT THE HUMAN IS CAPABLE OF DOING THROUGH

THE MIND IS DUPLICABLE PHARMACOLOGICALLY-IT'S ALL CHEMISTRY. I THINK ANYTHING FROM INSIGHT TO PARANOIA TO JOY TO FEAR CAN ALL BE REPRODUCED CHEMICALLY

Also, the thing you do to reduce harm, itself does harm. If you remove drug laws you have thousands of unemployed law enforcement people who are going to see that in an entirely different light.

What would be the damage to society from changing the drug laws? If you look at it through one lens you can see that it's going to be horrendous, and if you look through another lens you can see that it's going to be a lifesaver.

HT: What do you think about urine tests?

Alexander: They are intolerable! Taking of a urine sample is a presumption of guilt. There's no basis for one unless there's a reason to believe that a person is incompetent in some way.

If, for example, you run a bus into a group of pedestrians, then go into the nearest bar for a drink, there may be reason for a urine test. But if a person is going to fly an airplane and before he boards the plane you take a sample of his urine and send it off to Florida for analysis it doesn't protect the people on that flight at all!

HT: You talked in PIHKAL about how racism has been one of the root causes of prejudice against various drugs. How so? Alexander: The connection between racism and drugs started in the public consciousness with the building of the Trans-Continental Railway. To save on labor costs we hired Chinese immigrants and they brought with them the practice of opium use. Regulations were subsequently put into place to limit and control access to opium which was soon considered a social evil. The marijuana laws were put into effect to control Mexicans coming over the border and cocaine is nowadays very much associated with blacks in the inner cities.

HT: What benefits have you both received from taking pyschedelic substances? Alexander: I think I've learned about myself a little more thoroughly from the inside out and I've learned to take myself a little less seriously. I've also learned not to take anything I hear as gospel—even if I say it myself!

Ann: Psychedelics have allowed me not only to explore myself and my own levels of consciousness to an extraordinary extent, but by doing so I feel that I'm beginning to understand what the human consciousness is. There are so many kinds of knowing, and the kinds of knowing that have the most impact are unexplainable.

HT: What would you say to someone who suggested that drug use was simply a form of escapism?

Ann: It is amazing to me that people use the term escape in association with psychedelics. I've found them to be the most incredibly hard work.

Alexander: The same thing could be said about going to a symphony orchestra and listening to concerts or going to church. These could also be looked upon as escape. 'Eu' as a prefix means normal. Euthyroid means you have a normal thyroid function. The word euphoria means that this is the way you should feel. If you don't feel the way you should feel that would be dysphoric.

Ann: This culture regards a state of euphoria as something abnormall

HT: Have either of you had to face the problem of addiction?

Alexander: I have with nicotine but not with any of the other substances I've used. Ann: The whole idea of using psychedelics is to train yourself to a different kind of perception which you should be able to use without drugs. Most spiritual teachers say that you should develop the altered states in a 'natural' way and not use drugs to do it. We think that is the equivalent of saying you should never go to a symphony or listen to a recording, you should produce the music yourself, not using any other tools besides your own body.

HT: Although you both believe strongly in legalization, you do think that some guidelines must be established for drug use?

Alexander: Absolutely. Giving a drug to a person who is not developed enough to use it in the opinion of people who have worked with it, giving a drug without consent, giving out false information about a drug—all these need to be controlled. Ann: I like to make the rather obvious comparison of psychedelics with sex. Nobody in their right mind would say that sex is bad for us, but no one would advise someone under a certain age to try it! There is a certain stage of growth you need to go through before you're ready for either.

HT: Terence McKenna says that there is a spirit or intelligence that dwells within certain plants. In *PIHKAL*, you discuss how at times you've felt the presence of some entity or force guiding your work. Do you see this as being related to what Terence has claimed?

Ann: I think that there are forms of energy that some people see as elves or fairies. Whether they see these or not seems to depend more on whether the culture they live in allows for seeing such things. The Irish are famous for it. Is this because a certain kind of energy associated with natural things is translating itself telepathically into an acceptable form for the human who is looking at it? It's an open question.

Alexander: I was listening to Terence McKenna years ago at Esalen. He was talking about how if a drug comes from nature it's okay, but if it comes from a lab it's suspect. Suddenly he realized that I was sitting in the audience. In essence I said, "Terence, I'm as natural as they come. To me there's no difference between making a new chemical and interacting with it than there is interacting with a plant."

HT: As John Lilly said, "Plants are chemists too."

Ann: Exactly, and some of them will kill you. Just because it's natural doesn't mean it's benign.

Alexander: I've studied alchemy a bit and it's very much about feedback. Who cares if you melt and fuse lead ten thousand times? At the end of it you don't come out with anything but ten thousand times melted and fused lead! But the doing of it---that's *meditation*.

HT: Do you believe that there might be a teleological reason for why psychedelics exist?

Ann: Sure. How on earth did anyone ever discover the psychedelic properties of the peyote cactus or something that's only active as a snuff? Have you ever tasted peyote? Your instinct says, that's poisonous! Considering the fact that we create consensual reality, some part of us may have assigned certain plants the ability to open those doors.

HT: That's interesting. What procedures do you use when testing out a new drug and what do you do if everyone's experience is different?

Alexander: When I test a new drug on myself I use extremely small levels with much space between each time to eliminate the effects of tolerance. When I get up to a level that I feel comfortable with, Ann and I share it and see if indeed we have the same responses. Then we introduce it to individuals within the research group.

We often find that some of the materials have radically different responses within the group. I had to abandon a whole family of compounds which I called the Alephs because they were too erratic. Someone would have an over-stimulating experience on 2 mg and someone right next to them on 7 mg would experience nothing at all!

TMA6 was another compound I worked on and abandoned. We were exploring it because it was an opening to a new family of compounds. It was clearly active. You knew you were in an altered place, but you couldn't give it a name or a character. There were no visuals and no time distortion—nothing. So we throw it porto the

INTERVIEW . SHULGIN

group, and we were all up against the wall! When I went to take a pee in the bathroom the wallpaper came out and shook hands! Everyone had an intense experience. Ann: There are certain things that if we find, we don't pursue use of the substance. For example, if my emotions are flattened. it's an absolute no-no to go on with it. Also, if we're not interested in touching each other then there's something wrong. Also, of course, you learn to spot signs of impending nervous system trouble, like the possibility of a convulsion. The research group doesn't get any of these things until we know for sure that a substance is not going to attack our nervous systems.

HT: How do you see pharmacological tools being used to expand potential in the areas of creativity, intelligence and spiritual understanding? Alexander: I think anything that the human is capable of doing through the mind is duplicable pharmacologically—it's all chemistry. I think anything from insight to paranoia to joy to fear can all be reproduced chemically.

The fact that there are specific receptor sites for specific materials in the body which duplicate the actions of drugs from outside the body implies that those receptor sites at which these drugs operate are there because the human produces one for that same purpose.

Ann: I think that depending on the way you interact with any particular psychedelic, creativity and imagination can arise. Basically you're giving yourself permission to use these powers.

HT: What are some of the basic guidelines that you would recommend to an individual who was experimenting with psychedelics?

Alexander: Learn everything you can about the material and stay away from all information that's clearly geared to encourage or discourage its use. Ann: Doing your first experience with a very trusted friend who has taken this substance before is very important. That sort of companionship can turn a very bad trip into a very good learning experience. Your psyche is very eager to have you learn things and if you can develop an acceptance and a calmness you can overcome a lot. *****

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This abridged interview will appear in its entirety in a forthcoming book entitled Mavericks of the Mind 2, to be published by the Crossing Press in the Spring of 1995. This Agreement is entered into this <u>4</u> day of December, 1995 (the effective date of the Agreement), by and between the United States of America and the Drug Enforcement Agency, acting through the United States Department of Justice (hereinafter referred to as "United States"), and Alexander T. Shulgin, (hereinafter referred to as "Shulgin"). As a preamble to this Agreement, the parties state:

RECKENT

Preamble

WHEREAS, at all relevant times hereto, Shulgin was registered with the United States Department of Justice, Drug Enforcement Administration (hereinafter "DEA") pursuant to 21 U.S.C. § 822 and held a DEA Certificate of Registration, No. (b)(7)(E) as an Analytical Laboratory; that pursuant to DEA Registration No. (b)(7)(E) Shulgin was authorized to operate as an Analytical Laboratory with respect to schedules I, II, III, IIIN, IV and V controlled substances as defined by the Controlled Substances Act, 21 U.S.C. §801 et seg.; that pursuant to 21 U.S.C. §§ 821, 827 and 842 and the implementing regulations thereunder, 21 C.F.R. Subparts 1301 and 1304, Shulgin was required to make, keep and furnish records of controlled substances obtained through his DEA registration; that on September 27 and October 27, 1994 the DEA conducted administrative inspections of Shulgin's registered location; and that during said administrative inspections the DEA found fifty two (52) violations of 21 U.S.C. § 842(a) of the Controlled Substances Act because Shulgin had failed to keep, maintain or furnish records of

the controlled substances which were found at his registered location during the DEA administrative inspections.

WHEREAS, Shulgin admits the following facts only for the purpose of admitting civil violations of the Act, and not for any other purpose, including use in any possible criminal prosecution, except to the extent of their use in any possible administrative proceedings as set forth in paragraph 5 below, Shulgin admits: that when the DEA conducted administrative inspections of his registered location on September 27 and October 27, 1994, DEA agents requested that Shulgin produce records of each substance manufactured, received, sold, delivered or otherwise disposed of by Shulgin pursuant to 21 U.S.C. § 827; that Shulgin failed to produce the records required by 21 U.S.C. § 827 on those two dates; that Shulgin did not keep records of each substance manufactured, received, sold, delivered or otherwise disposed of by him as required by 21 U.S.C. § 827; and that based on Shulgin's failure to make and keep records of each substance manufactured, received, sold, delivered or otherwise disposed of by him, Shulgin violated the provisions of 21 U.S.C. § 842(a); and that Shulgin admits to fifty-two (52) record keeping violations of 21 U.S.C. § 842(a).

WHEREAS, based on these violations now admitted only for purposes of civil violations of the Act by Shulgin, the DEA referred this matter to the United States Attorney for proposed civil action pursuant to 21 U.S.C. §842(a) and that the United States and Shulgin wish to settle these violations on terms and conditions mutually agreed to by each party.

ACCORDINGLY in reliance upon the representations contained herein and in term consideration of the mutual promises, covenants and obligations in this Agreement and the resolution of the claims set forth below, and for good and valuable consideration, receipt of which is by each acknowledged, the parties agree as follows:

Terms and Conditions

1. Within three (3) calendar days of the effective date of this Agreement, Shulgin will execute Exhibit A hereto which is entitled "Voluntary Surrender of Controlled Substances Privileges, File No.^{(b)(7)(E)} " The execution of Exhibit A by Shulgin will be witnessed by two parties as provided for on the document and will further be notarized by a Notary Public. The executed document will be hand delivered to AUSA^{(b)(7)(C)} at the United States Attorney's Office, 450 Golden Gate Avenue, 10th Floor, San Francisco, CA 94102 no later than the day following Shulgin's execution of the same.

2. By executing Exhibit A, Shulgin agrees to surrender his DEA Registration as an Analytical Laboratory, No.^{(b)(7)(E)} and further agrees, as so stated in the Voluntary Surrender, that he will not be permitted to order, manufacture, distribute, possess, dispense, administer, prescribe or engage in any other controlled substance activities whatever, until such time as he may again be properly registered.

3. At the same time that Shulgin tenders the Voluntary Surrender of Controlled Substance Privileges to the United States Attorney's Office, Shulgin

hall physically surrender to DEA Diversion Investigator 81 23 controlled substances Shulgin has is his possession, custody or control which he had previously obtained with his DEA Registration No.^{(b)(7)(E)} Shulgin shall contact Investigator (b)(7)(C);(b)(7)(F) before the date of surrender to make the necessary arrangements to surrender the controlled substances. Should Shulgin not have in his possession any controlled substances but shall have disposed of said controlled substances prior to the effective date of this Agreement, Shulgin shall, instead of surrendering substances, allow Investigator b(7)(C);(b) to come to his lab and he will explain and show Investigator b(7)(F)how he disposed of any controlled substances which had been in his possession. Shulgin shall respond to all questions posed by Investigator^{(b)(7)(F)} about the disposition and circumstances of the disposition of said controlled substances and further provide access to all records with refer, reflect or relate to the investigatop)(7)(F) destruction of said controlled substances.

b)(7)(C):(b)(7)(F)

4. Within five (5) calendar days of the effective date of this Agreement, Shulgin will have a cashier's check issued in the amount of \$25,000 (twenty $-f_1 = f_2 = f_1 = f_2 = f_1 = f_2 = f_2$

5. In exchange for Shulgin's performance of the terms and conditions set forth in Paragraphs 1-4 above, the United States agrees to forbear from filing a civil action against Shulgin for the fifty-two (52) violations of 21 U.S.C. § 842(a)

and any additional violations which could be brought for Shulgin's destruction of any controlled substances between the time of the administrative investigations and the effective date of this Agreement. Nothing in this agreement, however, shall be construed as a waiver by the United States to use the underlying facts which have been admitted to by Shulgin, and which led to this settlement agreement, in any future administrative proceeding which would result if Shulgin were to reapply for a DEA registration. Nothing in this Agreement, however, may be used as an admission of fact for purposes of a criminal proceeding based on the violations admitted to by Shulgin in the Preamble above.

6. Each of the signatories to this Agreement represents that he or she has the full power and authority to enter into this Agreement.

7. This writing constitutes the entire agreement of the United States and Shulgin with respect to the subject matter of this Agreement and may not be modified, amended or terminated except by a written agreement signed by the parties specifically referring to this Agreement.

8. Shulgin acknowledges that he has read and understands the terms of this Agreement and has been advised by his counsel [^{(b)(7)(C)} Esq. concerning the terms and conditions of the Agreement. Shulgin further acknowledges that after a review of this Agreement himself and after discussing it with his counsel, Shulgin voluntarily and knowingly enters into this Agreement.

9. Should Shulgin breach the terms of this Agreement, that is, fail to execute the Voluntary Surrender of Controlled Substances Privileges, surrender the

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controlled substances thereafter and pay to the Department of Justice \$20,000 by cashier's check, all as more fully set forth in Paragraphs 1 to 4 above, Shuigin agrees to have the terms of the Agreement enforced against him in District Court and further agrees to pay reasonable costs and attorney's fees of the government associated with enforcing the Agreement.

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(b)(7)(C);)(7)(F)

10. In Witness Whereof, the parties, through their duly authorized

representatives, hereunder set their hands.

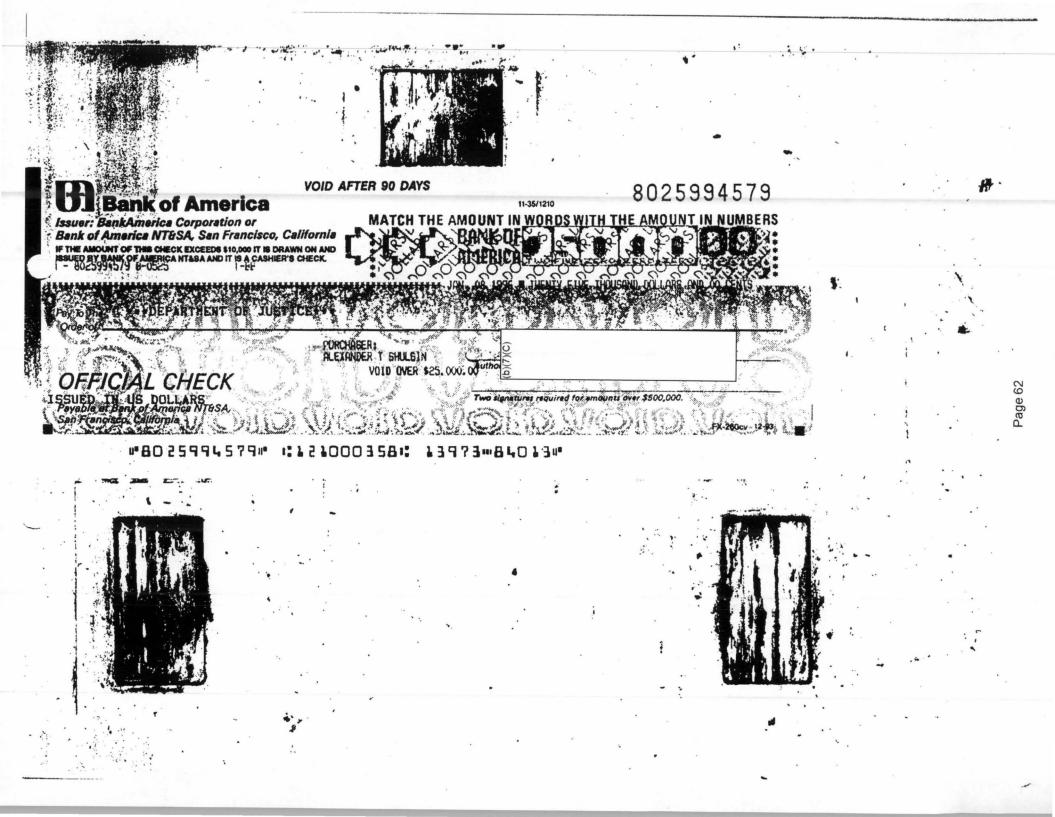
		ON BEHALF OF THE UNITED STATES OF AMERICA	
		(b)(7)(C)	
		United States Attorney	
		ANorthern District of California	¥
Dated:	13/13/95	(b)(7)(C)	
		Assistant U.S. Attorney	
Dated:	1/4196	Stephinch (1. Sturf Merfander ; Shing	~
		ALEXANDER T. SHULGIN, MEL	1 .
Dated:	1/4/96	(b)(7)(C)	
		Attorney for Alexander T. Shulgin	

Shulgin Settlement Agreement with U.S.

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INFORMATION COMPANY AND	
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I hereby voluntarily surrender my Drug Enfor	rement Administration Certificate of
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time as I am again properly registered.	
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NAME OF REGISTRANT (Print)	ADDRESS OF REGISTRANT
Alexander T. Shulgin	1483 Shulgin Road Lafeyette, CA 94549
signature of redistrating of Authorized Hoiv Dual	DATE 8/96 1/5/96
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U.S. Department of Justice Drug Enforcement Administration

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49. REMARKS (Refer to Item No. when applicable)

SYNOPSIS:

On September 27, 1994, October 27, 1994 and October 31, 1994, the DEA executed Administrative Inspections of Alexander SHULGIN's laboratory/residence based on his public statements regarding research with Hallucinogens (High Times Article, August 94) and a review of Dr. SHULGIN's violative history with the DEA. The DEA inspections and subsequent investigations reveal that SHULGIN is conducting unauthorized Schedule I research, manufacturing and distribution of Schedule I controlled substances and their analogs including MDA, MDMA, LSD, MMDA-2, and failed to maintain controlled substance receipt, manufacturing and destruction records. On the October 27, 1994 inspection by the DEA, Alexander SHULGIN was found to be in illegal possession of six Schedule I Peyote plants. The DEA SFFD also participated in a State Criminal Search Warrant of Dr. SHULGIN's residence involving possible environmental violations. This investigation is ongoing. SHULGIN is also believed to be involved in illegal human drug testing.

Quantitative Requirement:	b)(7)(E)	
Drug Quantity Required:		er.

(b)(7)(F)

Actual Drug Quantity Documented: On October 27, 1994, during a DEA inspection, Dr. SHULGIN was found to be in possession of 25grams of the controlled substance analog MMDA-2. 25grams of MMDA-2 equals a d.u., 25grams of MMDA-2 yields approximately 1,000 d.u. (see DEA ROI (b)(7)(E) dated 11/03/94).

Actual Drug Quantity: Unknown, not yet analyzed by DEA Special Testing Laboratory, McLean, VA.

\$ 2.6

EPIC Check: Negative except for NADDIS Hits (b)(7)(E)

Ca	56/18/	(b)(7)(C)
DE: Ed	102	(b)(7)(C)	
ST 1	E- Will	50.	8181
1140	(b)(7)(C)		

50. Agent's Name (Print or Type)		(b)(7)(C);(b)(7)(F)	0			52. Date
(b)(7)(C);(b)(7)(F)	Investigator					2/30/94
53. Supervisor's Nam	e (Print or Type)					55. Date
(b)(7)(C);(b)(7)(F) , Group Supervisor						4/30/99
		SAC APPROVA	L (if appropriate)			
5((b)(7)(C);(b)(7)(F)			57. Concurrence	No	58. Date	194

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Page 151

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U.S. Department of Justice of Drug Enforcement Administration		RE	PORT OF DRUG	PROPERTY CO	LLECTED, P	URCHASED O	R SEIZED
1. HOW OBTAINED (Check)	Purchase	Seizure	Free Sample	2a. FILE NO.	2b. PR	OGRAM CODE 3.	G-DEP ID
	Flashed Comp		Second	(b)(7)(E)	- I	(b)(7	')(E)
Other (Specify					-		
48 WHERE OBTAINED (City, St	ate/Country)	4b. DATE	OBTAINED	5. FILE TITLE	1 · · · · ·		
A familie CA		Openhar	31, 1094			7	
6a. REFERRING AGENCY (Nam	e)	66. REFER		(b)(7)(C)		GROUP NO.	
8 9		Case No	OR Seizure No.	7. DATE PREPAR		7HC: (bx7xF)	
	Lia	No.	12.	Hovember 1	APPROX. GH	USS CUANTIT	Purchase
9. Exhibit 10. FDIN No. (8 characters)	ALLEGED D	RUGS	MARKS OR LAB	ELS (Describe fully)	13. Seized	14. Submitted	Cost
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			a glass vial	*////	1	1	0.
4	+						
16. WAS ORIGINAL CONTAINE	R SUBMITTED SE	PARATE	ROM DRUG ?	NO (Included above)	YES (If Yes	s, enter exhibit no. an al container fully)	nd describe
REMARKS:				*			b)(7)(C)(b)(7)(E)
On 10/31/94 the abov	e exhibits	were su	rendered by D	c. SHULCIN at	his resid	ence to D/I	5)(1)(0),(0)(1)(1
On 11/01/94 the exh1	bits were p	rucessee	DV III (C)(C) (C)	(•)(•)	. The exi	hibits were t	then
mailed to DEA Specia	l Testing L	ab by b.	1((7)(C);(b) on 11	/03/94.			
and a second state of the second s							
17. SUBMITTED BY SPECIAL A	GENT (Signature)		18 AF	PROVED BY (Signatu	ure & Title)		
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25. ANALYSIS SUMMARY AND	REMARKS	9		a state			
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26. 27. 28.	ACTIVE DRUG	INGREDIE	NT WE	GHT PER UNIT ANA	LYZED	32	13.
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U.S. Department of Justice Drug Enforcement Administration

REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

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DEA Form 7 McLean, VA	DEA Com			L	Contract Maintenance		Laborato	ry Director		M. M	cLean, V	A		
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Read instructions on reverse before completing.

U.S. Department of Justice

REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

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REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

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6. REFERR	ING AGENCY	(Name)	Cas	FERRAL	н	(b)(7)(C)		GROUP NO.			
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34		Unknow			poysealli lass vial		28.89.9	wt 28.8g.9	jut		
REMARKS: On 10/31, On 11/01,	/94 the a	AINER SUBMITTI bove exhibi xhibits ver cial Testin	ca were s e process	surrender sed by D/	A ed by Dr. 1 (b)(7)(C);(b)(7)(F	5)	his resid	es, enter exhibit n nal container fully ience to n/ chibits wer	(b)(7)(C);(b)(7) I F)		
K		AL AGENT (Signa	ure)			DVED BY (Signati			-		
K	10	vestigator	LABORA		(b)(7)(C);(b))(7)(F)	roup Suber	visor	- 		
22. SEAL	AGES 20	AL AGENT (Signa RECEIVED FROM	ABORA M (Signature &		(b)(7)(C);(b)	1/7/(E)	raab Saber re	visor			
22. SEAL	AGES 20	RECEIVED FROM	ABORA M (Signature &	Date)	(b)(7)(C);(b) DENC)(7)(F) 21. TI	raab Saber re	visor			
)(7)(C);(b)(7)(F) 19. No. PACK 22. SEAL Broken	AGES 20 Jobroken (b) IS SUMMARY	AND REMARKS	Cross	te)	(b)(7)(C);(b) DENC)(7)(F) 21. TIT 24. TIT	Gross WT	visor efter Analy 8.8 gm			
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Read	instructions on reverse	
t	efore completing.	

D.

U.S. Depar Drug Enfor	tment of Just cement Admir	istration	RE	REPORT OF DRUG PROPERTY COL					LLECTED, PURCHASED OF		
1. HOW OI	BTAINED (Ch	eck) Purchase	Seizure	Fre	e Sample 2a	. FILE NO.		2b. PRC	GRAM CODE	3. G-DEP ID	
C Lab. S	Seizure	Money Flashed Con	mpliance Sample	e (Non-Crim	(b)	7)(E)			C	b)(7)(E)	
		(CHy, State Country)	4b. DATE (OBTAINED	5.	FILE TITLE					
I of ount	- CA		October	31. 19	1994						
6a. REFER	RRING AGEN	CY (Name)	1	6b. REFERRAL ² (b)(7			(b)(7)(C)				
	41	1	_	No			1 100		C).(b)(?xF)		
9. Exhibit	10. FDIN	11.		12.	S OR LABELS (ovember	APP	ROX. GHO	SS QUANTITY	5. Purchase	
No.	(8 charac		DRUGS				13. 5		14. Submitte		
29		Unknown			powder_con ss_vial_#2		0 29	.Og.gwt	29_0g_g	wt. 0.0	
				(Dec. c)	owder cont	alood in	28	5a aut	28.5g.g	wt 0.0	
30		Unknown		a gla	se vial \$2	2230	- 20	* 28.240	- enteringen	0.0	
31		Unknown		White	powder co as vial \$2	ntained	in 28	.3g.gwt	28.39.9	wt 0.0	
				agia	as viai ez	ble had					
		NTAINER SUBMITTED	SEPARATE F	ROM DRUG	? 💭 NO (I	ncluded above	e) 🛛 Y		enter exhibit no I container fully		
REMARK	S:	above exhibits		rondoro	d by Dr. C	UNTOTE -	t bla	reeldor	ne to D/I	(b)(7)(C);(b)(7)(F)	
0n 10/3	1/94 the	exhibits were	orucessed	by D/I	(b)(7)(C);(b)(7)(F)	nuthin a		he exhi	lbits were	then	
nailed	to DEA S	pecial Testing	Lab by D/	1 (b)(7)(C);(b	on 11/03/	94.					
		1)(/)(F)		1.5					
			l								
		r									
		ECIAL AGENT (Signatur	e)			VED BY ISign	nature & Ti	itle)	7.3		
b)(7)(C);(b)(7))(F)	Investigator	ADODAT		(b)(7)(C);(b)(7)	(F)	Group	Supervi	1001		
19. No. P	ACKAGES	20. RECEIVED FROM	Signature & Da	te)	The HECEI	21. 1	TITLE				
*1	3	Pin 6.12	911 5	39	11/7/9X					4.1.2	
22. SEAL	and the second s	(b)(7)(C)			10	24. T		ni dia			
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25 ANAL		RY AND REMARKS	ABORATOR	TANALY	313/CONFAN	SON REFU			<u>, , , , , , , , , , , , , , , , , , , </u>		
		T	Grocel	LFF	Net			Crope	WT after	Analysia	
Lab #		Exhibit	Gross	the second			/	GIOSS	1	and the second se	
A1847	· · · · ·	29 8 3 2 . 32 . 14M	29.9	gm	0.00	71 gm	1	1. 35 ⁻³⁰ 6.855	29.0 gm	w.,	
A1848	Į.	30 835 95 JMV	28.5 g	gm	0.04	12 gm /			28.5 gm		
A1849		31	28-3 8		0.01	83 gm	· · · · · ·	e'	28.3 gm		
A1049		51 51	2072	<u>ga</u>	0.01	gar Sm			28.3 gm		
26. Exhibit	27.	28. ACTIVE DRU		NT	WEIGHT	PER UNIT A	NALYZED	0	32.	33.	
No.	Lab. No.	A PARAMENTAL AND A	or Common Nan		29. Strength	30. Measure	9 31.	Unit	TOTAL NET	RESERVE	
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	A1848	Trans-iscapio				1				0.0020 8	
- 31	A1849	2,5-Dimethoxy	-4-bromop	henethy	tamine HC1			or Algon esti-		0.0135 gm	
								14 . 41	an a	8. L	
24 44141	YST (Signatur				35. TITLE	<u> </u>	2113	19 - A	DATE CO	101 5755	
(b)(7)(C)	-	C)							36, DATE CO	WPLETED	
37					38. TITLE	ic Chemi	st	1.1.0.42	39. LAB. LOC	4/35	
DEA For					Labora	tory Dir	ector	9	" McLes	n VA	

DEA Form - 7 (Apr. 1990) - 7

	Department of Justice	-
Drue	Enforcement Administration	

REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

Dieg Diaore	Autority I Pourie				AND A CANE STAT		A CONTRACTOR			-	CRAN CODE	2 0 05	010
1. HOW OB	TAINED (CH	neck)	Purchase	Seizure	Fre	e Sample	2a. FILE N	0.		26. PHO	GRAM CODE	3. G-DE	FIU
Lab. S	eizure (Money F	lashed Com	pliance Sample	e (Non-Crin	ninal) (t	o)(7)(E)		1			(b)(7)(E)	1
Other	(Specify	Surre	ndered					*		l	an dan ya sana da ana ana ana ana ana ana ana ana a	l	
4a. WHERE	EOBTAINED			46. DATE	OBTAINED		5. FILE TI	TLE					
Lafayet	te. CA		ł	October		194	(b)(7)(C)						
	RING AGEN	ICY (Name)	6b. REFER	CALCULATION CONTRACTOR	H				N.P.	DOUR NO		
				Case No	. OR Se	eizure No.	7. DATE PF	REPARI	ED	1.1	CHORDER NO.		
				No.			Uovenb	erl,					
9. Exhibit No.	10. FDI (8 chara		11. ALLEGED	DRUGS	12. MARK	S OR LABELS	(Describe	fully)	13. Sei		14. Submitt		Purchase Cost
26	(o chara		Unknown		White	powder c	ontaine	d in	28.7	i.gwt.	28.7g.g	wt.	0.1
24			1			ss vial #			100				
27			Unknown		White	powder c	ontaine	ed in	29.10	a.qwt.	29.1q.q	INF	
		÷.			a gla	ss vial	22210	-		an other store			0.1
28			Unknown		and the second se	owder con		in	29.2	a.gwt.	29.29.9	WE -	0.0
			1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		a gla	ss vial	22220						
						-		<u> </u>			z		
16. WAS O	RIGINALCO	ONTAINER	SUBMITTED S	EPARATE F	ROM DRUG	37 LINO	(Included a	bove)	U YE		enter exhibit n container fully		scribe
REMARKS	S:											(b)(7)(C)	;(b)(7)(F)
On 10/3	51/94 th	e above	exhibits	were sur	rendere	ed by Dr.	SHULGI	Nat	his r	esider	ice to D/	1	
UR 11/0	11/94 (14	e exnic	ILS WERE D	1 GCCSSeq	0Y 1/1		/		_ In	e exha	bits wer	e thér	£
palled	to DEA :	special	Testing L	ab by u	1 (0)(7)(F)	on 11/0.	3/94.						
			gen in the s		E								
						40.4000		2	- 8 T -		and the second		
17. SUBMI (b)(7)(C);(b)(7)		· · · · ·	ENT (Signature)			(b)(7)(C);(b	DVED BY (-					
(=)(-)(-)(-)(-)		Invest	inator \	APOPATO	DEV EVI	DENCE RECE			coup S	uperui	Sor	ta a di san di sandili ta a	
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19. NO. FA	Z	1		Matore di Da	James the	11/7/2	1						
22. SEAU	1	(b)(7)(C)	a Guy	101	1.1	11/11/		4. TITL	F				
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	7	-	. LA	DUNATUR	ANALY	SIS/COMPAR	ISON RE	PORT	. 7	ar and	and a second state		And the second se
25. ANAL	YSIS SUMMA	ARYAND	REMARKS										
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A184	5	21		23.33 8	çai	0.0290	gu		67	• • Sur			
A1840	6	28		29.65	713	0.1051	-810		29	.3 gm	Y		
11040	•	20		278034		QUARTER	Om				E Charles - Der Denne - A		
				Anna Agenti A	R	an. contra	11 11	·	1. 1. 1. 1.	<u>an 1566 s</u>		(<u> </u>	
26. Exhibit	27. Lab.	28 .	ACTIVE DRUG			Carlo Carlo Carlo Carlos	T PER UNI		T		32.	33.	
No.	No.		(Established or			29. Strength	30. Mea	sure 🤤	31 L		TOTAL NET	1	ERVE
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	28	3.4-1	lethylened!	lozymethe	mphete	ine BC1						-0.0	0966 g
		+							14/2010		in ign ann, -	+	
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34 ANAL	YST (Signatu	[ary sold and a support of the support	35. TITLE			1			1	
(b)(7)(C)	. or toignatu										36. DATE CO		
3						38. TITLE	Chemi	st	25.11	Ather	- 01/1		
						JO. TILE					39. LAB. LOC	ATION	
DEA Form	-						bery Di	****		- Ser -	MeLoan.	37A	
(Apr. 1990)	, - 7		Previo	us edition dat	ed 10/87 is	OBSOLETE.					5	Hdates F	File

		Although the same of the local division of t			COI	LECTED			
1. HOW OBTAINED (Check)	Purchase	Seizure	Free Sample	2a. FILE NC).	26.	PROG	RAM CODE	3. G-DEP ID
Lab. Seizure Money	Flashed Com	pliance Samp	le (Non-Criminal)	(b)(7)(E)					(b)(7)(E)
4a, WHERE OBTAINED (City, S	rendered	AN DATE	OBTAINED	5. FILE TIT	LE			and the	
	State/Country)			JEG C I					
afayette, CA 6a. REFERRING AGENCY (Nam	ma)	6b. REFEI	<u>31, 1994</u>	(b)(7)(C)				IVASSE VIII - RO	
Da. REFERRING AGENCT (Na	ine)		0. OR Seizure No.	7. DATE PRI	EPARE	D	8. GF	ROUP NO.	
1		No.	. On Seizore No.	liovenbe	r 1.	1994	(5)(7)(5)	x(Ti€)	
Exhibit 10. FDIN	11.	1 10.	12.	191			GROSS	QUANTITY	15. Purch
No. (8 characters)	ALLEGED	DRUGS	MARKS OR LABE	LS (Describe fu	(yllu	13. Seized		14. Submitte	
23	Unknown		Tan powdar co	ntained i	a.a	29.30	not-	29.39.9	it.
et a congra			glass vial #2						9
			-						
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18 1			glass vial \$2	2211					
0.0	Palacia						-		2
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6. WAS ORIGINAL CONTAIN				O (Included abo					and describe
Ú	AGENT (Signature)	ABORAT	18. APF (b)(7)(C):: DRY EVIDENCE RE	ROVED BY (S b)(7)(F) CEIPT REPOI	AGE	oup Supe	TVIS	eu I 2	- j 4, 2
22. SEAL Bioken Unbroken	<u>1 (6/2</u>) D REMARKS Groe 29.	47. gm 17 gm 58 gm	<u>Net WT</u> 0.3807 gm	NG4	Gr	1055 WT 4	29.5 29.3 29.5	c Analysi gm gm see 000,00 d gm obis robis robis robis robis	5 5)
Z2. SEAL Lab Exhibit Bioken Unbroken Bioken Unbroken Bioken Unbroken Z5. ANALYSIS SUMMARY AND Lab Exhibit A1842 24 A1843 25 26. 27. Exhibit 28.	<u>4 662</u> р вемаякя стоя 29 29 29 29 29	47. gm 17 gm 58 gm	Net WT 0.3807 gm 0.004 gm (0.4278 gm	estimated	ANAL	OSS WT 4	29.5 29.5	c Analysi gm gm gm monstration gm monstration gm monstration gm monstration gm monstration gm monstration gm fraction gm fract	is
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Z2. SEAL Dioken Dioken <thdiokn< th=""> <thdiokn< th=""> Diokn<td>ACTIVE DRUG (Established or</td><td>47. gm 17 gm 58 gm INGREDIEN Common Nam</td><td>Net WT 0.3807 gm 0.004 fm (0.4278 gm VT WEIG 29. Strengt</td><td>estimated</td><td>ANAL</td><td>YZED 31. Unit</td><td>29.5 29.3 29.5</td><td>C Analyst gm 200 000,00 month 200 000,00 month 200 1 2. OTAUNET</td><td>33. RESERVE 0.3791</td></thdiokn<></thdiokn<>	ACTIVE DRUG (Established or	47. gm 17 gm 58 gm INGREDIEN Common Nam	Net WT 0.3807 gm 0.004 fm (0.4278 gm VT WEIG 29. Strengt	estimated	ANAL	YZED 31. Unit	29.5 29.3 29.5	C Analyst gm 200 000,00 month 200 000,00 month 200 1 2. OTAUNET	33. RESERVE 0.3791
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Laboratory Director

McLean, VA

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122362

1. HOW OBTAINED (Check) Purchase Seizure Free Sample 2a. FILE NO. 2b. PROGRAM CODE 3. G-DEP ID 1. HOW OBTAINED (Check) Money Flashed Compliance Sample (Non-Criminal) (b)(7)(E) (b)(7)(E) (b)(7)(E) 1. HOW OBTAINED (Specify SURRENDERED 4b. DATE OBTAINED 5. FILE TITLE (b)(7)(E) (b)(7)(E) 4a. WHERE OBTAINED (City, State/Country) 4b. DATE OBTAINED 5. FILE TITLE 5. FILE TITLE LAFAYETTE, CA/USA SEPTEMBER 27, 1994 (b)(7)(C) 6b. REFERRAL (b)(7)(C) 6a. REFERRING AGENCY (Name) 6b. REFERRAL 7. DATE PREPARED 8. GROUP NO. DYNCIDID No. 10 10	U.S. Department of Justic Drug Enforcement Adminis		REP	ORT OF	DRUG P	ROPERT	Y COI	LECTE	D, PU	RCHASED	OR SE	IZED
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REMARKS: Diginal contains (bity) OIT SEPTLIDER 21, 1994, DR. ALEXANDER SMULCIN SURRENDLRED THE EXHIBITS NOTED ABOVE TO DIVERSION INVESTIGATOR (BIC/RDZ/RF) MAD SECURED THEM AT THE DEA SEPT. ON OCTOBLE 28, 1994, THE EXHIBITS WERE PROCESSED AND FORMAFUED TO THE DEA SPECIAL TESTING LABORATORY FOR ANALYSIS. 17. SUBMITTED BY SPECIAL AGENT (Big/D/(NC)/D/(YF)) INVESTIGATORY FOR ANALYSIS. 17. SUBMITTED BY SPECIAL AGENT (Big/D/(NC)/D/(YF)) INVESTIGATORY EXPERIENCE RECEIPT REPORT 17. SUBMITTED BY SPECIAL AGENT (Big/D/(NC)/D/(YF)) INVESTIGATORY EXPERIENCE RECEIPT REPORT 18. NO. PACKAGES 200 FRECEIVED FROM (Signifur'S Date) 19. NO. PACKAGES 200 FRECEIVED FROM (Signifur'S Date) 10. NO. PACKAGES 200 FRECEIVED FROM (Signifur'S Date) 11. Laboratory 11. CK 22. SEAL 16. CA 16. 16. 0 12. ZESA 16. 16. 16. 0 12. ZESA 16. 16. 16. 0 12. ZESA 16. 16. 17. ZESA 28. STOCK 16. 16. 11. 24. 25. ACTIVE D	16 WAS ORIGINAL CON	TAINER SUBMITTED SE	EPARATE FRO	OM DRUG ?		(Included at	Dove)	YES (If Yes, e	nter exhibit n	o. and des	cribe
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REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

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U.S. Department of Justice ** Drug Enforcement Administration

REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

1. HOW OBTAIN	UED (Chack)	-	0	0	2a. FILE N	0.	1	25. PRO	GRAM COD	E 3. G	DEPID
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4a. WHERE OBT	TAINED (City, S	tate/Country)	4b. DATE OBT	AINED	5. FILE TIT	LE			and a summary and a set of the set	1	
LAFAYETTE.	CA/USA		SEPTEMBER	27. 1994							
6a. REFERRING		ne)	6b. REFERRA	L	(b)(7)(C)		_	_	×		
			Case No. C	R Seizure No.	7. DATE PF				ROUP NO.		_
		Tee	No		Octobe	r 28					_
9. Exhibit 10. No.	FDIN (8 characters)	11. ALLEGED D	DRUGS 12.	MARKS OR LABEL	S (Describe f	ully)	13. Seize		14. Submi		5. Purcha Cost
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1. HOW OBTAINED (Check			Free Sample	2a. FILE NO.	12	b. PROG	RAM CODE	3. G-DEP ID
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4a. WHERE OBTAINED (Ci	ty, State/Country)	45. DATE OBTAIN	IED	5. FILE TITLE	-			
afayette, CA		October 27.		(b)(7)(C)				
a. REFERRING AGENCY	(Name)	6b. REFERRAL						
		Case No. OR	Seizure No.	7. DATE PREPAR	RED	8. GF	OUP NO.	
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Exhibit No. 10. FDIN (8 characters) 11. ALLEGED I	DRUGS 12. MA	RKS OR LABE	LS (Describe fully)	APPROX 13. Seized		14. Submitte	i or crids
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17. SUBMITTED BY SPECIA (7)(C):(b)(7)(F) S/A 19. No. PACKAGES 20. 22. SEAL 23. Broken Unbroken 23.	AL AGENT (Signature) RECEIVED FROM (Sin (b)(7)(C)	ABORATORY EV	VIDENCE REC	24. TIT	LE			
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Lab. Seizure	Money F	C	0	le (Non-Criminal)	(b)(7)(E)			N/A	(b)	(7)(E)
a. WHERE OBTAIN	ED (City, Sta	ite/Country)	4b. DATE	OBTAINED	5. FILE	TITLE				<u></u>
. REFERRING AGE			6b. REFER	27. 1044	(b)(7)(C)					
8. REFERRING AGE	NCY (Name)		RAL D. OR Seizure No.		PREPAR	ED	8	GROUP NO.	
			No.	D. OR Seizure No.		0.0		D3(78C) (0)	1979	
Exhibit 10. FE	N	11. ALLEGED	47.74	12.	- Set abe	or 20,	APPRO	x	UANTITY	15. Purcha
	acters)	ALLEGED	DRUGS	MARKS OR LAB	ELS (Descri	be fully)	13. Seiz	-	14. Submitte	
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S., 1		Unknown		White Dawder				-14	91.0 -00	0
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5. WAS ORIGINAL	ONTAINER	SUBMITTED	SEPARATE F	TOM DRUG ?	NO (Included	d above)	YES	(If Yes,	enter exhibit no	o. and describe
EMARKS:					(b)(7)	(C);(b)(7)	- 144	origina	l container fully)
	1994. 1	he above	exhibits	were seized by			าแกรมอก	1 10	a Federal	
inistrative	Inspect	ion Warra	nt at 141	3 Shulqin Driv	e. Lafa	velte	CA.	TEAL	Tra	(b)(7)(C);(b)
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ALDER AND	ater ma (b)(7)(C);(t PE 20/RECE (b)(7)(C)	iled to D(, for ana) (7)(F)	LA Special lysis.	DRY EVIDENCE RE		21. TIT	LE		ld Springh	
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7. SUBMITTED BY S 7. SUBMITTED BY S (C):(b)(7)(F) 9. No. PACKAGES 2. SEAL Broken Unbroken 5. ANALYSIS SUMM Lab # A1822 A1823 A1824 5. Exhibit No. 27. Lab. No.	ater ma (Ir()inia (b)(7)(C);(t PE 20/RECE (b)(7)(C) ARY AND F Exhib 4 5 6	LA ACTIVE DRUG (Established or	ABORATORY Gross MI 107.6 g 106.8 g 91.9 g G INGREDIEN Common Nam	T WEIN PARALYSIS/COMF	CEIPT RE CEIPT RE ARISON F VT 31 gm 33 gm 5 gm 5 gm 5 gm 5 gm	21. TIT 24. TIT REPORT	LE .E	c aft 106 105 90	er Analys: .4 gm .8 gm .7 gm	16 33. RESERVE
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		in a glass vial	#22201					
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Page 170

U.S. Department of Justice Drug Enforcement Administration

				FILE NUMBER		DATE 20	1000
	DISPOSITION OF	DRUG EVIDENCE				March 20	1, 1996
	(Do NOT Use For)	Non-Drug Evidence)	95 and	2 (b)(7)(C)	M.D.		
IGINATOR (A	lame of Field Office and C	Case Agent)	CONTRACTOR OF THE OWNER	DIAN (Name of DEA Labo			ef)
San Fr	ancisco Divisióon	n_Office	1	ial Testing and		i to a second	
Divers	ion Investigato	c ^{(b)(7)(C);(b)(7)(F)}		Old Springhouse		1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	
				an, VA 22102-34	_		
and the second			(b)(7)(C)		Labora	atory Dive	ctor
	The followin		PARTI				
disposed of	in accordance with Ac	g exhibits in this case are dministration instructions.	no longer	needed as evidence	and shou	la be	
an posed of		annabiation matractions.					
trans	ferred to						S. March
		(Agency)				74	
		AGENT				LABORATO	
chibit No.	Laboratory No.		Drug		-	ed Destroyed F	Retained Sto
- 38	A1856	Unknown tan powe	der conta	ined in a glass		- X -	2 3.8
		vial #22225					
39	A1857	Unknown tan powd	for conto	ined in a algee		V	
- 12	ALOJI	vial #22205	Jer courd	uneo in a grass		1	1
40	A1858	Unknown white po	owder con	tained in a		X	10 14
		glass vial #222]				1	
							100
11/2		3/10/9/				112496	
CASE AGEN	T (Signature)	3/20/96 DATE		PPROVING OFFICIAL/(S	ignature)	12496 DATI	E
-1/,	6101		PART II		ignature)	12496 DATE	
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		and the second	FILE NUMBER	DATE	
	DISDOSITION OF		(b)(7)(E)	March 20, 19	9F
	DISPOSITION OF	DRUG EVIDENCE	FILETITLE	That on 207 15	
	(Do NOT Use For N	on-Drug Evidence)	(b)(7)(C)	M.D.	
NATOR (Name of Field Office and Ca	se Agent)	CUSTODIAN (Name of DEA Lab		-
San Fr	ancisco Division	Office	Special Testing and	Research Laburatory	
	sion Investigator		7704 Old Springhous	se Road	
DIVELS	SION INVESCIGACOL		McLean, VA 22102-		
	and the second		(b)(7)(C)	Laboratory Directo	r
	(T) ()) '	PAR		1 1 111	_
	-	exhibits in this case are no	longer needed as evidence	and should be	
sposed o	of in accordance with Adi	ninistration instructions.			
Otrana	sferred to				
Chang		(Agency)			
		AGENT		LABORATORY	
it No.	Laboratory No.		rug	Transferred Destroyed Retain	ed
35	A1853	Unknown white powde	er contained in	X	
-		glass vial #22222			_
	- 2054	Dalance delta more	alt contained in a		
36	A1854	Unknown white pryst glass vial #22216	als contained in a		
		glass viai #22210			
37	A1855	Unknown white cryst	als contained in a	X	
	Chilled	glass vial #22227			
		1 /		7/22/76	
ITT SE AGE	NT (Signature) /	/DATE	APPROVING OFFICIAL		
IMI SÉ AGÉI	NT (Signature)	/DATE	APPROVING OFFIC/AL (-
1/1/ KSÉ AGÉI		PAR	T II		
171 SE AGEN		DATE PAR going exhibits were disposed of	T II		
171 (sé agér 7/	19/96 the fore (Date)	going exhibits were disposed of	T II as indicated above. to		
1/1/ KSE AGEN	19/96 the fore (Date)		T II as indicated above. to(Agency)		
7/ 7)(C)	19/96 the fore (Date) the fore	going exhibits were disposed of	T II as indicated above. to	Signature) DATE	
7/ 7)(C)	19/96 the fore (Date) the fore (Date)	going exhibits were disposed of going exhibits were transferred 7/24/96	T II as indicated above. to(Agency)		
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7)(C) •IDENCE	19/96 the fore (Date) the fore (Date)	going exhibits were disposed of going exhibits were transferred 7/24/96 (b)(7)(C)	T II as indicated above. to	Signature) DATE	

U.S. Department of Justice

		DRUG EVIDENCE Non-Drug Evidence)	96 MAR FILE TITLE TO (b)(7)(E)	March 20,	1996
IGINATOR (N	ame of Field Office and Co	ase Agent)	CUSTODIAN (Name of DEA Labo		
San Fra Divers	ancisco División ion Investigator	Office (^{(b)(7)(C);(b)(7)(F)}	Special Testing and 7704 Old Speinghouse McLean, VA 22102-34	Road 194	
Star 1	and the shall		(b)(7)(C)	Laboratory Direct	or
34	The following		PART I no longer needed as evidence a	and should be	
disposed of		ministration instructions.	no tonger needed as evidence a	IIII SHOULD DO	
transf	ferred to	(Agency)		and the second sec	
	- April 1	AGENT		LABORATORY	,
hibit No.	Laboratory No.		Drug	Transferred Destroyed Reta	ined S
32	A1850	Unknown white p vial #22224	owder contained in a glas	3 <u>8</u> X	
33	A1851	Unkn gen white p glass vial #222	oystaline powder in a	X	
34	A1852	Unkwown white p	oysealiline powder in a 15	X	
nte	(C);(b)(7)(F)	3/20/16 DATE	(b)(7)(C):(b)(7)(F)	ignature) DATE	
CASE AGEN	9/96 the for (Date)	egoing exhibits were dispose	APPROVING OFFICIAL (S) ART II d of as indicated above.	ignature) DATE	
CASE AGEN On On	17 (Signature) 9/96 the for (Date) the for (Date)	egoing exhibits were dispose egoing exhibits were transfe $7/24/9$	APPROVING OFFIC/AL (5) PART II d of as indicated above. rred to	ignature) DATE	
CXSE AGEN On On (b)(7)(C)	9/96 the for (Date) the for	egoing exhibits were dispose egoing exhibits were transfe $7/24/9$	APPROVING OFFICIAL (8) PART II d of as indicated above. med to	IDJAGE ignature) DATE NJUT 196	
CXSE AGEN	17 (Signature) 9/96 the for (Date) the for (Date)	egoing exhibits were dispose egoing exhibits were transfe 7/24/9 and Date) (b)(7)(C)	APPROVING OFFICIAL (8) PART II d of as indicated above. med to	ignature) DATE	

U.S. Department of Justice Drug Enforcement Administration

	· ·· · · · · · · · · · · · · · · · · ·	Re it	FILENUMBER	D	ATE		.4
	DISPOSITION OF		(b)(7)(E)	1	March 2	0, 199	6
	DISPOSITION OF I	'96	MAR 27 FILE TITLE	_			
	(Do NOT Use For No	on-Drug Evidence)		M.D.			
IGINATOR (N	ame of Field Office and Cas	e Agent)	CUSTODIAN (Name of DEA Labor				
San Fra	ancisco Division	Office	Special Testingfand F		Labora	cory	
Divers	ion Investigator	(b)(7)(C);(b)(7)(F)	7704 Old Espinghouse	Road			
			McLean, VA 22102-349	Laborat	ary Dire	ector	
		D/		Laborat	JLY DIE	CCLOL	
	The following		no longer needed as evidence at	blould	he		
disposed of		inistration instructions.	to tonger meeted as evidence a	ICA BILO CILL			
J amposed of	In accordance when then				Ar - Contract		
transf	erred to		the second s	and the second of	<u>64</u>		
		(Agency)			1. 194		
		AGENT		W. Capel	LABORAT	1	r
xhibit No,	Laboratory No.		Drug	Transferred	Destroyed	Retained	St
29	A1847		der contained in a		X		-
		glass vial #2220	8	-			-
20	1040	thelenore has never	lon contrained in a silver		X		+
	A1848	vial #22230	der contained in a glass		~		1-
		VIAL #22230		1.			1
31	A1849	Unknown white no	wder contained in a gla	IS	X		+-
		vial #22223				1	1
	L. L					1	T
CASE AGEN	T (Signature)	/ DATE	APPROVING OFFICIAL (SI	nature)	DA	TE	
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	Date)						
(17 . 6		ed to		Contractions.		-
On		going exhibits were transferre	(Agency)				
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On(b)(7)(C)		7/24/96	(b)(7)(C)	2]	4-196		
On(b)(7)(C)	(Date)	7/24/96		2]	4-186		-
(b)(7)(C)	(Date)	7/24/96	(b)(7)(C)	<u></u>	4-185		
(b)(7)(C)	(Date)	7/24/96	(b)(7)(C)	2]	<u>ur/१६</u>		
(b)(7)(C)	(Date)	(b)(7)(C)	(b)(7)(C)	<u></u>	<u>u-196</u>		
(b)(7)(C) EVIDENCE	(Date)	(b)(7)(C)	(b)(7)(C) WITNESS (Signature and Date)	2]	<u>u-196</u>		
(b)(7)(C) EVIDENCE	(Date)	(b)(7)(C)	(b)(7)(C) WITNESS (Signature and Date)	2].	<u>u-196</u>		
(b)(7)(C) EVIDENCE	(Date)	(b)(7)(C)	(b)(7)(C) WITNESS (Signature and Date)	<u></u>	<u>u-196</u>		
(b)(7)(C) EVIDENCE	(Date)	(b)(7)(C)	(b)(7)(C) WITNESS (Signature and Date)	2]	<u>ur/96</u>		
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(b)(7)(C) EVIDENCE	(Date)	а Date) (b)(7)(C) Савонатону сніет (Si	(b)(7)(C) WITNESS (Signature and Date)	2]	<u>ur/96</u>		
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On(b)(7)(C)	(Date) TECHNICIAN (Signature and	а Date) (b)(7)(C) Савонатону сніет (Si	(b)(7)(C) WITNESS (Signature and Date)	21	<u>r/१६</u>		
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(b)(7)(C) EVIDENCE	(Date) TECHNICIAN (Signature and	а Date) (b)(7)(C) Савонатону сніет (Si	(b)(7)(C) WITNESS (Signature and Date)	2]	<u>ur/96</u>		
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U.S. Department of Justice

Drug Enforcement Administration

			FILE NUMBER	DATE
	DISPOSITION OF	DRUG EVIDENCE	(b)(7)(E)	March 20, 1996
	(Do NOT Use For N	101 UT 111	FILE TITLE (b)(7)(C)	
CINATOR (N	ame of Field Office and Ca		TODIAN (Name of DEA Labor	nton and I aboratory (high)
	ancisco Division			Research Laboratory
	ion Investigator		04 Old Springhouse	
DIVELD.	ton investigator	McI	Lean, VA 22102-34	94
		(b)(7)(C	C)	Laboratory Director
		PART I		
		exhibits in this case are no longe	er needed as evidence a	nd should be
disposed of	in accordance with Ad	ministration instructions.		
—				
L transf	erred to	(Agency)		
	Station of Contractor	AGENT		LABORATORY
hibit No.	Laboratory No.	Drug		Transferred Destroyed Retained St
26	A1844	Unknownwhite powder cor	ntained in a glass	X
				· · · · · · · · · · · · · · · · · · ·
27	A1845	Unknown white powder co	ontained in a	
		glass vial #22210		
28	A1846	Unknown tan powder cont	tained in a glass	
		vial #22220	and the all the galance	
(b)(7	')(C);(b)(7)(F)	11	(b)(7)(C);(b)(7)(F)	
ATT		3/10/96		3/22/76
CASE AGEN	T (Signature)	DATE	APPROVING OFFICIAL (SI	gnature) DATE
1	, /	PART II		
Dn 7/1	19196 the fore	going exhibits were disposed of as ind	licated above	
	Date)	9		
)n		going exhibits were transferred to		
(b)(7)(C)	(Date)		(Agency)	
		7/01/01	p)(7)(C)	
Cullence :		1121176		
EVIDENCE	TECHNICIAN (Signature o	(b)(7)(C)	TNESS (Signature and Date)	
			V	
			1/15/01	
		LABORATORY CHIEF (Signature an	nd Date)	
			NAMES OF TAXABLE PARTY OF TAXABLE PARTY.	
ARKS				
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		IST DEAVED	
	DISPOSITION OF	FILETITLE	DATE March 20, 1996
IGINATOR (Name of Field Office and Ca	and the second se	tory and Laboratory Chief)
San Fr	ancisco Diviston ion Investigator	Office Special Testing and Re (b)(7)(C);(b)(7)(F) 7704 Old Springhouse B McLean VA 22102-3494	esearch Laboratory Road
	1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	PART I	
1.	The following f in accordance with Adr sferred to	exhibits in this case are no longer needed as evidence an ministration instructions.	d should be
		AGENT	LABORATORY
xhibit No.	Laboratory No.		Transferred Destroyed Retained St.
23	A1841	Unknown Tan powder contained in a blass vial #22228	* * X
	and a second		X
24	A1842	Unknown brown liquid contained in glass brial #22211	
24	A1842 Ajj843		
25 ///		bial #22211 Unknown white powder contained in glass vial #22207 b bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bare bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(C).(b)(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7)(F) bb(7	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
25 ///	Aj843 (7)(C);(b)(7)(F) NT 'Signature) (9/9/6) the fore (Daté) the fore	bial #22211 Unknown white powder contained in glass vial #22207 (b)(7)(C):(b)(7)(F) APPROVING ØFFICIAL/(Sign PART II going exhibits were disposed of as indicated above.	ature)
25 	Aj 843 (7)(C);(b)(7)(F) NT 'Signature) 19/96 the fore (Daté)	bial #22211 Unknown white powder contained in glass vial #22207 (b)(7)(C).(b)(7)(F) APPROVING ØFFICIAL/(Sign PART 11 going exhibits were disposed of as indicated above. going exhibits were transferred to 7/24/96 (b)(7)(C)	2/2/96 DATE 7/2/96 DATE
25 	Aj843 (7)(C);(b)(7)(F) NT 'Signature) (9/9/6) the fore (Date) the fore	bial #22211 Unknown white powder contained in glass vial #22207 (b)(7)(C).(b)(7)(F) APPROVING ØFFICIAL/(Sign PART 11 going exhibits were disposed of as indicated above. going exhibits were transferred to 7/24/96 (b)(7)(C)	2/12/96 DATE 7/22/96 DATE



U.S. Department of Justice Drug Enforcement Administration

rug Enforcemer	nt Administration	Real Property Re	REVED THAT THE REPORT	Jan -	196.62	
	DISPOSITION OF (Do NOT Use For N	DRUG EVIDENCE	FILE NUMBER (b)(7)(E) FILE TITLE (b)(7)(C)	MD	March	20, 199
RIGINATOR (Name of Field Office and Co	use Agent)	CUSTODIAN (Name of DEA La			
San Fr	ancisco Division	Office	Special Testing and 7704 Old Springhouse McLean, VA 22102-349	Road	Laborato	bry
Divers	ion Investigator	(b)(7)(C);(b)(7)(F)	(b)(7)(C)		ory Direc	ctor
		P	ARTI			
		g exhibits in this case are ministration instructions. (Agency)	no longer needed as evidence	and shoul	d be	
		AGENT		1	LABORAT	OBY
Exhibit No.	Laboratory No.		Drug	Transferre	d Destroyed	
20	A1838	Unknown White po vial #22214	wder centained in glass	STEL SALAN MEN	X	
21	A1839	Unknown tan powd vial #22218	er contained in a b lass		X	
22	A1840		er contained in a glass 22209		X	
On 7/ On (b)(7)(C)	(Date)	P. egoing exhibits were disposed				
EVIDENCE	TECHNICIAN (Signature a	(b)(7)(C)	WITNESS (Signature and Date	, 121	25195	
	6	LABORATORY CHIEF (S	Signature and Date)			-
EMARKS						
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			i Marine			
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			Page 177			2

			FILE NUMBER	DATE
			(b)(7)(E)	
	DISPOSITION OF I	DRUG EVIDENCE		March 20, 1996
	(Do NOT Use For No		(b)(7)(C)	
IGINATOR (N	ame of Field Office and Cas	e Agent)	CUSTODIAN (Name of DEA La	boratory and Laboratory Chief)
	ancisco Division			Research Laboratory
	ion Investigator		7704 Old Springhouse	
	ton investigator		McLean, VA 22102-34	
			(b)(7)(C)	Laboratory Divector
		PAF		1
		ninistration instructions.	o longer needed as evidence	e and should be
		(Agency)		
T		AGENT		LABORATORY
xhibit No.	Laboratory No.		Drug	Transferred Destroyed Retained Sto
17	A1835	Unknown Tan Powde #22212	er in glass vial	
18	A1836	Unkoww White powe	lon in alaca sial	
18	A1030	#22226	TEL TU YIGSS VIGI	
		766660		
19	A1837	Unknown Tan powde	er contaising capsules	X
		further contained		
		#22219		
CASE AGEN	T (Signature)	/ D'ATE	APPROVING OFFICIAL	(Signature) (DATE
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On	Date) the fore	going exhibits were disposed of	f as indicated above.	
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640au	(Date)	going exhibits were transferred	(Ageney)	
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		(b)(7)(C)	(·
			1 7	
		E	7123/96	
		LABORATORY CHIEF (Sign	ature and Date)	
EMARKS				
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			RU	FILE NUMBER	R		DATE	100	-
	DISPOSITION OF	DRUG EVIDENCE	'96 M	(b)(7)(E)	.04		March 20	J, 1996	2
and the second	(Do NOT Use For N			(b)(7)(C)					
San Fra	Name of Field Office and Ca ancisco Division ion Investigator	Office (b)(7)(C):(b)(7)(F)	Spec:	DIAN (Name of) ial Testin Old Sprin an, VA 2	g and l ghouse	Research Road	Labora	tory	
	The following	g exhibits in this case are	Construction of the second second	needed as ev	idence a	and should	l be		
disposed of		ministration instructions.							
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		(Agency)							
whibit No.	Laboratory No.	AGENT	Drug	e na fil e na anna 17 f an Alban an An Alban San Anna San		Transferred	LABORA Destroyed	1	St
16	A1834	Unknown tan powd	and the second se	ablet cont	ained		X		
		in glassine bagg	ie						-
+				1.1	4			+	-
									4
			K						
	p)(7)(C);(b)(7)(F)			(b)(7)(C);(b)(7)(F)		3/12			
NI	D)(7)(C);(b)(7)(F)	2/20/96 7 DATE		(b)(7)(C);(b)(7)(F)	FICIAL (SI	3/22 ignature)	194 DA	TE	
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			0 97	FILE TITLE		1		
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	Name of Field Office and Ca ancisco Division			DIAN (Name of DEA Labo cial Testing and	•			
	ion Investigator			4 Old Springhous				
			McL	ean, VA 22102-	3494			
			(b)(7)(C)		Labora	tory Di	rector	
		PAR	And the owner of the					
disposed o		exhibits in this case are no ministration instructions.	longer	needed as evidence	and should	De		
trans	ferred to	(Agency)		-				
		AGENT			T	LABORA	TOBY	
xhibit No.	Laboratory No.		Drug		Transferred	1		Sto
13	A1831	Unknown tan powder	oont	ained in		X		
		glass vials						
						N/		
_14	A1832	Unknown tablets co	ntain	ed in box	+	X		
15	A1833	Unknown tan powder	cont	ained in clear		Y	1	1-
		baggies		**************************************		1		
CASE AGEN	NT (Signature)	/ DĂTE ^O		PPROVING OFFICIAL/18	lignature) '	DA	TE	
On 7/1	9/96 the fore	going exhibits were disposed of		ated above.				
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		7/24/96			1 2/20	-196		
EVIDENCE	TECHNICIAN (Signature a		WITH	IESS (Signature and Date)	1/20	117		
		(b)(7)(C)		Y				
				A. Jai				
		LABORATORY CHIEF (Sign	ature and	<u>[[] [] []</u> Date)				
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Disrostition OROG EVIDENCE % MR 2 FILE FIFLE FILE FIFLE </th <th></th> <th>DATE</th> <th></th> <th></th> <th></th> <th></th>		DATE				
NGINATOR (Name of Field Office and Case Agent) CUSTODIAN (Name of DEA Laboratory and Laboratory Chief, Special Testing and Research Laboratory Chief, Special Testing and Research Laboratory Direct 2004 01d Springhouse Road 2004 01d	20, 1996	March 20	MAR 2 FILE TILE	20		
San Francisco Division Office Diversion Investigatgo Division Office Diversion Investigatgo Division Office Special Testing and Research Laborators 2004 Old Springhouse Road the Lean, VAA 22102-3494 Division Division Division Division Division Division Division PART I The following exhibits in this case are no longer needed as evidence and should be disposed of in accordance with Administration instructions. Division Division Division Division Division Division Division and Division			and a second a first of the second	Construction of the second	And the other states and the states of the	
Diversion Investigatgo (P(7)(C)(D(7)(F)) RiOde Old Springhouse Road McLean, VAA 22102-3494 PART I The following exhibits in this case are no longer needed as evidence and should be disposed of in accordance with Administration instructions. Transferred to AGENT AGENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT ADENT						
PART I The following exhibits in this case are no longer needed as evidence and should be disposed of in accordance with Administration instructions.		Road 94	4004 Old Springhouse McLean, VAA 22102-3			
Image: Contract of the second and			T			
AGENT LABORATOL ANIBIT NO. Laboratory No. Drug Transferred Destroyed Re 10 A1828 Unknown white powder contained in 7 X glass vials 11 A1829 Unknown yellow liquid contained in 3 X glass viaks 12 A1830 Unknown tan powder contained in 3 X plastic baggies X DATE PART II On (b(7)(C),(b)(7)(F) CASE AGENT (Signature) 0 (b(7)(C),(b)(7)(F) Con (before) 0 (bote) (b)(7)(C) (b(7)(C),(b)(7)(F) CASE AGENT (Signature) 0 (bote) 0 (bote) (b)(7)(C) (fignature and Date) (b)(7)(C) (fignature and Date) (c)(c) (fignature and Date) (c)(c)(c)		nd should be	o longer needed as evidence	ministration instructions.	in accordance with Adr	
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Page 181

U.S. Department of Justice Drug Enforcement Administration





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Page 183

U.S. Department of Justice

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REPORT OF INVE	STIGAT]	ION	P	age 1 of 1
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5. By: (b)(7)(C);(b)(7)(F) D/I At: San Francisco DO			6. File Title (b)(7)(C)	
Closed Requested Action Completed			8. Date Prepared	
Action Requested By:			December 30,	1996

DETAILS:

1. Reference is made to the attached DEA Form 48s, Disposition of Drug Evidence, concerning exhibits 1-47 under this case number and title. A memo dated March 21, 1996 was sent to the Special Testing and Research Laboratory requesting that the drug exhibits 1-47 be destroyed. Evidence Technician ^{(b)(7)(C)} of the Special Testing and Research Laboratory forwarded the DEA Form 48s dated July 24, 1996 which indicate that all of these exhibits have been destroyed.

ATTACHMENTS:

1. DEA Form 48s, Disposition of Drug Evidence (17)

INDEXING SECTION:	
1. ^{(b)(7)(C)}	

11. Distribution:	1(b)(7)(C);(b)(7)(F)	13. Date /
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U. S. Department of Justice Drug Enforcement Administration

REPORT OF INVEST		Page 1 of 2	
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5. By: (b)(7)(C);(b)(7)(F) At: Diversion Investigator San Francisco, CA		6. File Title (b)(7)(C)	
Closed Requested Action Completed Action Requested By:	D .	8. Date Prepared March 21, 19	96

10. Report Re:

Response to Special Testing Laboratory Memo, request for destruction of drug evidence (PN40)

DETAILS:

1. Reference is made to the attached memo dated February 21, 1996 forwarded by (b)(7)(C) (b)(7)(C) , Laboratory Director for the Special Testing and Research Laboratory. Mr. (b)(7)(C) has requested that the San Francisco Division Office reconcile its list of drug exhibits to determine discrepancies and that the office submit a DEA Form 48 for any evidence which may be destroyed. The Special Testing and Research Laboratory lists exhibits 1-47 for this case number.

2. After a review of the case file, it was determined that exhibits 1-47 that were sent to the Special Testing Laboratory pertained to exhibits gathered at the residence of Alexander SHULGIN. As Dr. SHULGIN has surrendered his DEA registration and been ordered to pay a civil fine, it was determined that the exhibits obtained at SHULGIN's residence were no longer needed in this case. As a result, DEA Form 48's for these exhibits will be forwarded to the Special Testing and Research Laboratory for destruction. A memo requesting the destruction will also be sent to the Special Testing and Research Laboratory and is attached to this report.

3. During a review of the case file, it was noted that some duplicate drug exhibit numbers had been given. Separate warrants were served at SHULGIN's address and at Dr. [0](7)(C) address and at each location drug exhibits were obtained. [0)(7)(C)

(b)(7)(C)	Totation drug exhibits we	exhibits obtained	from SHULGIN
were sent to the Special Te	sting and Research Laborato	ory.	
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District	14. (b)(7)(C);(b)(7)(F)		15. Date
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DEA Form (Aug. 1994) - 6	DEA SENSITIVE Drug Enforcement Administration	0	

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(Continuation)	3. File Title (b)(7)(C)	
Page of 2	6. Date Prepared	
5. Program Code	March 21, 1996	

INDEXING SECTION:

. [b)(7)(C);(b)(7)(E)				
1. 2.	SHULGIN,	Alexander	-	Nadd1s:	(b)(7)(E)

DEA Form (Aug. 1994) - 6a

DEA SENSITIVE Drug Enforcement Administration

2 - AMRI (PINK)

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U. S. Department of Justice Drug Enforcement Administration

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1. Program Code	2. Cross File	Related Files	3. File No. (b)(7)(E)	4. G-DEP	Identifier
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7. Closed Requested Action Completed Action Requested By:			8. Date Prepared January 12,	1996	

10. Report Re: PAYMENT OF \$25,000.00 FINE, SURRENDER OF REGISTRATION BY ALEXANDER SHULGIN (RA40)

DETAILS:

1. Reference is made to the attached settlement agreement entered into on January 4, 1996, by and between the United States of America, the DEA and Alexander T. SHULGIN (DEA Registration (b)(7)(E) Analytical Laboratory, schedules 2-5) wherein SHULGIN agreed to voluntarily surrender his DEA Registration (see attached DEA-104, "Voluntary Surrender of controlled Substance Privileges", dated January 8, 1996) in addition to paying a \$25,000.00 fine (see attached copy of check for the sum of \$25,000.00 issued by SHULGIN to the Department of Justice).

2. The subject settlement agreement resulted from the DEA SFFD Diversion Unit's Investigation of SHULGIN and his Analytical Laboratory which revealed (52) violations of 21 U.S.C. section 842(a) for failure to keep, maintain or furnish controlled substance records.

3. In addition, SHULGIN surrendered his DEA Certificate (see attachment #3) and unused order form. SHULGIN had no controlled substances to surrender. SHULGIN submitted an extensive list of controlled substances (see attachment #4) that he claims to have neutralized and flushed down his toilet on February 25, 1995, in his laboratory. SHULGIN conducted this destruction of controlled substances without DEA authority or proper documentation.

ATTACHMENTS:

- 1. Settlement Agreement
- 2. \$25,000.00 check
- 3. DEA Certificate
- Controlled substance destruction list

5. DEA 104

INDEXING SECTION:

DEA Form (Aug. 1994) - 6	DEA SENSITIVE Drug Enforcement Administration		2 - AMRI (PINK)
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U. S. Department of Justice Drug Enforcement Administration

REPORT OF INVES	TIGATION			Page 1 of	2
1. Program Code	2. Cross File	Related Files	3. File No. (b)(7)(E)	4.	G-DEP Identifier (b)(7)(E)
5. By: (b)(7)(C);(b)(7)(F) At: Investigator San Francisco, CA		(b)(7)(6. File Title C);(b)(7)(E)		
7. Closed Requested Action Completed			8. Date Prepared November 2	8, 1995	

10. Report Re: Meeting with AUSA^{(b)(7)(C)} Alexander SHULGIN financial statement, pending financial settlement and surrender of DEA Registration (RA40)

DETAILS:

1. On November 27, 1995, Investigator (b)(7)(F) met with AUSA (b)(7)(C) who stated that Alexander SHULGIN has agreed to pay a \$20,000.00 fine and a surrender of his DEA Registration (b)(7)(E) to settle the government's case against him. A Show Cause has been issued against SHULGIN's DEA Registration.

2. Reference is made to the attached financial statement for Alexander SHULGIN that was submitted to AUSA (b)(7)(C) documenting SHULGIN's financial status and disbursements for the last 5 years revealed the following:

-SHULGIN has significant assets including stocks totaling \$220.931.00 and saving accounts totaling \$220,822.00

-Alexander SHULGIN is a paid consultant at the University of California SFGH, 401 Parnassus Avenue, San Francisco, CA 94143.

-Alexander SHULGIN expends significant funds publishing his drug book PIHKAL, claims to be working on a second book about LSD and Triptomines.

-Alexander SHULGIN's disbursements indicate payments to the exclusive Bohemian Club referencing retired (b)(7)(C) as a guest of Alexander SHULGIN's. (b)(7)(C)

-Alexander SHULGIN's disbursement records indicate payments to Aldrich chemicals and Bryant Labs for chemicals.

-Alexander SHULGIN travels to Spain, Italy and Russia.

3. SHULGIN's financial statement has been referred to the IRS for review.

DEA Form (Aug. 1994) - 6	DEA SENSITIVE Drug Enforcement Administration	2 - A	MRI (PINK)
Other SARI, ODOD		upervisor	1130/95
District	14. Appr(b)(7)(C);(b)(7)(F)		15. Date
Division			11/2/95
11. Distribution:	F		13. Date
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Previous edition dated 5/80 may be used.

******	REPORT OF INVESTIGATION	1. File No. 2. 0 (b)(7)(E)	G-DEP Identifier	
(Continuation)	3. File Title (b)(7)(C)			
4.	Page of 2	L		
5. Program Code		6. Date Prepared November 28, 1995		

1. Alexander SHULGIN financial statement

INDEXING SECTION:

HULGIN, Alexander - NADDIS:(b)(7)(E) LDRICH CHEMICAL - NADDIS:(b)(7)(E)	11111
RYANT LABS - NADDIS: (b)(7)(E)	(b)(7)(C)

DEA Form (Aug. 1994) - 6a

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DEA SENSITIVE Drug Enforcement Administration

2 - AMRI (PINK)

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REPORT OF INV	ESTIGATION		Page 1 of		
1. PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE NO.	1	4. G-DEP IDENTIFIER
5. BY: (b)(7)(C);(b)(7)(F)			6. FILE TITLE	_	<u><u> </u></u>
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San Francisco, CA	Ιŭ				
Jan Trancioco, on	Ō	* 3	```		
7. Closed Requested Action Com	betel		8. DATE PREPARE	D	
Action Requested By:			August 25,	1995	
9. OTHER OFFICERS: D/I (b)(7)(C);(t					
10. REPORT RE: Alexander CH	ULGIN (NADDIS:	. (b)(7)(E) D	posal to AUSA	(PAAD)	
Alexander Sn	OLOTH (MADDIS.		Sposar to Rose	i (M140)	
					
DETAILS:					
1	. h				1005
 Reference is made to SHULGIN's attorney (b)(7)(C) 	ine attached	(b)(7)(C)	ce, dated Augu	ist 1/,	1995, from with D/I's (b)(7
(7)(F) and his proposal	that Alexander	r SHILCTN mai	erencing his	meeting	Vita D/1's
stration and that SHU					
b)(7)(C) made no reference	to settling 1	the nending	ivil action 1	v the II	S. Attorneys!
Office.	to secting	ine penuing	AVII ACCION I	by the U	.b. Actorneys
		1 1			
2. AUSA ^{(b)(7)(C)} has req	uested that SI	HULGIN submit	a financial	stateme	nt.
3. It should be noted th					
SHULGIN's Analytical Lab	Registration.	Judge Bittr	ner has set a	hearing	date for Febr
13, 1995.					
ATTACHMENTS:					
The Build of the Court of the Annual and the second second					
1. Attorney ^{(b)(7)(C)} corr	espondence dat	ed August 17	, 1995		
INDEXING SECTION:					
SHULGIN, Alexander -	(b)(7)(E)				
SHULGIN, Alexander -	NADDIS:				
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11. DISTRIBUTION:	12(b)((7)(C);(b)(7)(F)		1	13. DA
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78

REPORT OF INVEST	IGATION			Page 1 (of 2
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51		(E)(7)(C);(b)(7)(E)		
AT: Investigator					
San Francisco, CA		L			
7. Closed Requested Action Completed			8. DATE PREPAR	ED	
Action Requested By:			August 1	6, 1995	
9. OTHER OFFICERS: D/I (b)(7)(C);(b)(7)(F)					
10. REPORT RE:			ture Demont (1	14(0)	
Meeting with SHL	JLGIN'S A	ttorney, Sta	tus keport ()	(A40)	
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X					
DETAILS :		1			
1. On august 15, 1995, Diver	rsion Inv	estigators 10)(1)(C);(D)(1)(F)		met with
Alexander SHULGIN's (NADDISS		attorney (b)(7)(C	ati		ancisco United
States Attorney's office. Al	JSA (D)(/)(C)	\		-	court and was
unable to attend. The DEA in	nvestigat	ots and atto	rney (b)(r)(c)	_	the settlement o
the pending civil action again maintain his DEA registration	inst his	cinent.	star		UULGIN wants to also stated
that SHULGIN will continue do					
if he continues to be registe					
(7)(F) GIN. Investigator					
the DEA and the amount of					
is actively pursuing the revo	ocation o	f SHULGIN's			
that he would forward a prope	osal to A	USA (b)(7)(C)	-		IN would like to
maintain his registration as	part of	the settleme	nt.		
	VEN/ZVC				
2. In reference to civil fin	nes, barac	stat			ot have a lot of
money and that SHULGIN is pay					
federal EPA authorities. (b)(7) Spain. (b)(7)(C) stated that h					ntly visiting e consults with
Spain. ^{(b)(7)(C)} stated that h SHULGIN with regard to methan					he would forward
		of the week.	500	aceu char i	ne would loiwaid
proposal co noonoy					
3. Reference is made to the	ongoing-	show cause a	etipn against	SHULGIN'	s Analytical Lab
registration. The government	t has fil	ed its prehe	aring stateme	ent. Atta	ched to this repo
is Respondent's prehearing st	tatement	in this matt	er. A hearin	ng date is	pending.
ATTACHMENTS:					
1. Respondent's Prehearing s	statement	, dated July	31, 1995	0	
11. DISTRIBUTION:		(7)(C);(b)(7)(F)	-	[]	
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	REPORT OF INVESTIGATION	1. File No. (b)(7)(E)	2. G-DEP Identifier	
	(Continuation)	3. File Title (b)(7)(C)		
4.	Page of			
5. Progra	m Code	6. Date Prepared August 16. 1	995	

Th	PEXING SEC	TION:			\frown
	SHULGIN,	Alexander	-	NADDIS	(b)(7)(E)

DEA Form (Aug. 1994) - 6a

DEA SENSITIVE Drug Enforcement Administration

2 - AMRI (PINK)

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REPORT OF INVEST	Page 1 of		
1. Program Code	2. Cross Related Files File	3. File No. 4. G-DEP Ide (b)(7)(E) (b)(7)(E)	entifier
5. By: (b)(7)(C);(b)(7)(F)		6. File Title	
At Investigator San Francisco, CA		(b)(7)(C);(b)(7)(E)	
7. Closed Requested Action Completed		8. Date Prepared	
Action Requested By:		June 9, 1995	
9. Other Officers: S/A (b)(7)(C);(b)(7)(F)			
10. Report Re: Alexander SHULG	IN/Analytical Lab.		

AUSA Letter and Draft Complaint Citing 52 Violations of 21 USC842(a)(5)(RA40)

DETAILS:

1. Reference is made to the attached correspondence, dated June 5, 1995, and draft complaint sent from AUSA (b)(7)(C) to Alexander SHULGIN's attorney (b)(7)(C) (b)(7)(C) The correspondence documents a telephone conversation between AUSA (b)(7)(C) and SHULGIN's attorney indicating that AUSA (b)(7)(C) would be forwarding a draft complaint to his client. AUSA (b)(7)(C) states in her letter, "The statute provides that the United States may receive a maximum of \$25,000 for each of the 52 violations found by the DEA and listed in the complaint". The 52 violations of 21 USC 842(a)(5) were discovered by Investigators of the DEA SFFD Diversion Unit during the execution of an inspection warrant of SHULGIN's DEA registered Analytical Laboratory located at his residence. At the conclusion of her letter, AUSA (b)(7)(C) provides SHULGIN's attorney with the opportunity to have a meeting prior to the filing of the complaint.

2. It should be noted that the DEA has filed a Order to Show Cause against Alexander SHULGIN's Analytical Lab Registration. SHULGIN has requested a hearing in this matter.

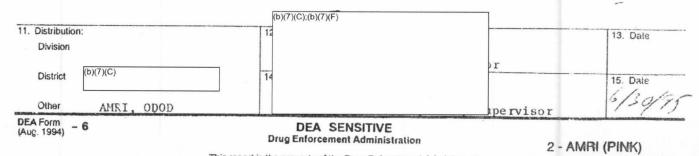
ATTACHMENTS:

1. AUSA Correspondence, dated June 5, 1995

2. Draft Complaint

INDEXING SECTION:

SHULGIN, Alexander - NADDIS: (b)(7)(E)



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REPORT OF INVES	IIGATION	14	gelof 5
. Program Code	2. Cross Related Files File	3. <u>File No.</u> (b)(7)(E)	4. G-DEP Identifier (b)(7)(E)
At: Investigator San Francisco, CA		6 File Title (b)(7)(C);(b)(7)(E)	R
Closed Requested Action Completed		8. Date Prepared April 27, 1995	5
9. Other Officers:]	.GIN (NADDIS: (b)(7)(E)	-

SYNOPSIS:

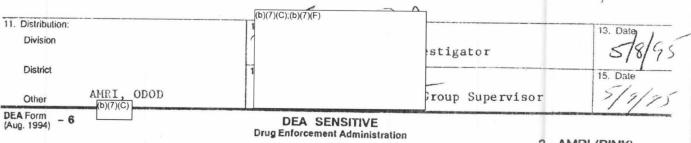
On April 14, 1995, DEA issued and Order to Show Cause to Chemist Alexander SHULGIN alleging multiple violations of the CSA including the illegal manufacture of Schedule I controlled substances and illegal possession of schedule I peyote plants.

DETAILS:

1. Reference is made to the attached Order to Show Cause in the matter of Alexander SHULGIN, 1483 Shulgin Road, Lafayette, CA 94549, DEA #(b)(7)(E), Analytical Laboratory, drug schedules I-V, dated April 14, 1995 (see attachment #1).

2. This Order to Show Cause has been issued to Alexander SHULGIN to afford him the opportunity to Show Cause before the Drug Enforcement Administration, at a place and time to be determined, as to why the Drug Enforcement Administration should not revoke his DEA Certificate of Registration, (b)(7)(E), under 21 USC 824(a)(4), and deny any pending applications for renewal of his registration as an analytical laboratory under 21 USC 823(f), for reason that SHULGIN's continued registration would be inconsistent with the public interest, as evidenced by, but not limited to, the following:

- A. On February 8, 1977, the State of California Research Advisory Panel withdrew approval for SHULGIN's continued research on a marijuana project based on SHULGIN providing Schedule I controlled substances to a non-registrant as well as without the use of an order form in violation of law and SHULGIN's failure to obtain panel approval for non-marijuana Schedule I drug research. As a result, this action suspended SHULGIN's State authority to conduct research with Schedule I controlled substances.
- B. Subsequently, on June 9, 1977, the DEA revoked SHULGIN's previous registration, (b)(7)(E), as a researcher.

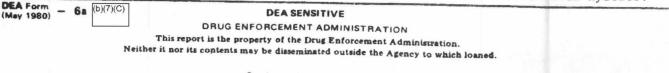


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Drug Enforcement Administration

	REPORT OF INVESTIGATION	1. FILE NO. (b)(7)(E)	2. G-DEP IDENTIFIER (b)(7)(E)
-	(Continuation)	3. FILE TITLE (b)(7)(C)	
•. Page of 5			
5. PROG	RAM CODE	6. DATE PREPARED April 27, 19	95

- C. On January 11, 1994, SHULGIN materially falsified his application for renewal as an analytical laboratory by indicating in his response that his research activity "was abandoned in 1977" and by failing to note in his explanation that his previous State and Federal researcher authority had been suspended or revoked. This application was approved and <u>SHULGIN</u> was registered as an analytical lab in Schedules I through V.
- D. On October 27, 1994, during an administrative inspection of SHULGIN's registered location by DEA, SHULGIN was found to be in possession of six cactus plants which were located on the porch of his residence. These plants were subsequently identified as peyote, which SHULGIN stated had been received by him as a gift from a member of the Native American Church. SHULGIN had no records of receipt or written protocols to indicate that these plants were possessed in the course of his registration as an analytical laboratory. Accordingly, SHULGIN possessed peyote, a Schedule I controlled substance, in violation of 21 USC 844.
- E. 1. On September 27, and October 27, 1994, during an administrative inspection of SHULGIN's registered location by DEA. SHULGIN was found to be conducting research involving Schedule I controlled substances, not authorized under, nor coincident to, his analytical laboratory registration in violation of 21 CFR 1301.22(b)(3) and 21 USC 844. SHULGIN told Investigators that he was conducting research, relating to the manufacture of therapeutics, with the Schedule I controlled substances 2CB aka Nexus, Methcathinone, MDMA, and their analogs. This activity was also in violation of California Health and Safety Code Section 11401 and 11054-55. SHULGIN also failed to maintain any records documenting his manufacture of these substances.
 - 2. On September 27, 1994, during an administrative inspection of the area of the registered location described as the laboratory, investigators found 3.42 grams of 2C-B, and 0.9 grams of Metheathinone, both Schedule I controlled substances. SHULGIN stated that his research involved the use of both substances in experiments conducted with a medical practitioner (b)(7)(C) (b)(7)(C) in San Francisco, and that SHULGIN transported controlled substances between the two locations. SHULGIN failed to complete and maintain DEA Forms 222 or other records to document these transfers. This activity constitutes a violation of 21 USC 841(a)(1). In addition, SHULGIN also stored numerous controlled substance analogs without the documentation required by the California Health and Safety Code Section 11400 et. seq.
 - On September 27, 1994, during an administrative inspection of the area of the registered location described as the Magic Stockroom on SHULGIN's property, investigators found the Schedule IV controlled substance chloral hydrate.



Drug Enforcement Administration

	REPORT OF INVESTIGATION	(b)(7)(E)	2. G-DEP IDENTIFIER	
	(Continuation)	3. FILE TITLE (b)(7)(C)		
	Page 3 of 5			
PROGRAM	CODE	6. DATE PREPARED April 27, 1995		

- SHULGIN's registered location described as the kitchen, investigators found approximately 200 vials of "reference samples", which SHULGIN described as containing both controlled and non-controlled substances which SHULGIN had manufactured. Although the manufacture of such controlled substances may be within the scope of his DEA registration, SHULGIN failed to maintain any records of such manufacture as required by 21 CFR 1304.03.
- 5. On September 27, 1994, during an administrative inspection of the area of the registered location described as the library/computer room, investigators found on top of a file cabinet a vial labelled "N-Anhydroxy MDMA", plastic bags containing unidentified powder marked with dates and the letters "AD", a commercial package of the Schedule II controlled substance Marinol, and a liquid that SHULGIN identified as a "homolog" of LSD. SHULGIN stated that he had no records of the materials stored in this room although subsequent laboratory testing by DEA confirmed the presence of controlled substances.
- 6. On September 27, 1994, during an administrative inspection of the area of the registered location described as Basement #4, investigators found scattered on a table, various samples and substances ostensibly sent to SHULGIN for analysis. SHULGIN stated that some samples that he received are controlled substances, others are not. SHULGIN stated that he has not kept a log book documenting the receipt of samples for several years. DEA subsequently seized some of these substances and identified them as Schedule I controlled substances by laboratory testing. SHULGIN failed to maintain any records of receipt or identification for these substances. Furthermore, SHULGIN had no DEA approval to do anonymous testing and was unable to distinguish whether any controlled substances were received as evidentiary material for analysis. SHULGIN also identified certain liquid and powder samples as the schedule I controlled substance "Dexus" (2CB) and mother liquid of (2CB), which SHULGIN had synthesized, but for which he had no manufacturing records.

7. DEA conducted an analysis of 47 drug exhibits seized during the execution of search warrants at SHULGIN's residence. These analysis indicated that four samples were non-controlled, four samples were Schedule I analogs, and thirty-nine samples were Schedule I controlled substances. SHULGIN had no records of manufacture or receipt for any of these substances. Furthermore, SHULGIN had no DEA approval to do anonymous testing and was unable to distinguish whether any controlled substances were received as evidentiary material for analysis. SHULGIN failed to maintain controlled substance receipt records in violation of 21

DEA Form	6a(b)(7)(C)	DEA SENSITIVE	
		DRUG ENFORCEMENT ADMINISTRATION	
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REPORT OF INVESTIGATION (Continuation)	1. FILE NO. 2. G-DEP IDENTIFIER (b)(7)(E) (b)(7)(E) 3. FILE TITLE (b)(7)(C)
Page 4 of 5	
PROGRAM CODE	6. DATE PREPARED
	April 27, 1995
 propiophenone HCL, both Schedu 9. SHULGIN conducted human drug r of the Federal Food, Drug, and an approval for an investigati 360aa or a new drug applicatio 	f ethyltriptamine acetate and methylamino le I controlled substances. esearch with methcathinone analogs in viola Cosmetic Act, in that SHULGIN failed to se onal new drug application (IND) under 21 US n (NDA) under 21 USC 355(a), or maintain th rds required by 21 USC 331(e) and 355(i), a
controlled substance, which he synthesi was subsequently sold to the University SHULGIN was not registered with the DEA	eceived 50 grams of cocaine, a Schedule II zed into 2, 3 Anhydroegognine. This produc of California for \$2,785. At that time, as a manufacturer of controlled substances CFR 1301.22(b)(4), as an analytical laborat

3. The following procedures are available to SHULGIN in this matter:

analytical or instructional purposes.

A. Within 30 days after the date of receipt of this Order to Show Cause, SHULGIN may file with the Administrator of the Drug Enforcement Administration a written request for a hearing in the form set forth in Section 1316.47, Title 21, Chapter 2, Code of Federal Regulations. (See Section 1301.54(a)).

analytical or instructional purposes and not for distribution. SHULGIN provided no records to indicate that this substance was transferred to another DEA registrant for

B. Within 30 days after the date of receipt of this Order to Show Cause SHULGIN may file with the Administrator a valver of hearing together with a written statement regarding his position on the matters of fact and law involved. (See Section 1301.54(c)).

C. Should SHULGIN decline to file a request for a hearing or should he so file and fail to appear at the hearing, he shall be deemed to have waived the hearing and the Administrator may cancel such hearing, if scheduled, and may enter his final order in this matter without a hearing and based upon the investigative file and the record of this proceeding as it may then appear. (See Sections 1301.54(d) and 1301.54(e)).

DEA Form - 6a (b)(7)(C)

DEA SENSITIVE

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Drug Enforcement Administration

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	REPORT OF INVESTIGATION	1. FILE NO. (b)(7)(E) 2. G-DEP IDENTIFIED (b)(7)(E)			
	(Continuation)	3. FILE TITLE (b)(7)(C)			
4.	Page 5 of 5				
5. PROG	RAM CODE	6. DATE PREPARED April 27, 1995			

4. The investigation of SHULGIN by the DEA has also been forwarded to the AUSA's Office for civil action.

ATTACHMENTS:

1. Show Cause Order

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x		
EA Form - 68 (b)(7	(C) DEA SENSITIV	
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Page 201

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1. Program Code	2. Cross Re File	lated Files	3. File No. R3-93-2077		b)(7)(E)	
5. By: (b)(7)(C);(b)(7)(F) At: Investigator San Francisco, CA			6. File Title (b)(7)(C);(b)(7)(E)			
7. Closed Requested Action Completed			8. Date Prepared April 26, 199	5		
9. Other Officers:			· · · · · · · · · · · · · · · · · · ·			
10. Report Re: Meeting with EF	A Re: SHULGIN	'S Labo	ratory (RA40)			

DETAILS:

1. On April 26, 1995, Investigator (b)(7)(C);(b)(7)(F) met with (b)(7)(C), Federal onsite Coordinator, Emergency Response, EPA, 75 Hawthorne Street, San Francisco, CA 94105 to discuss the findings of DEA's on-site inspection of SHULGIN's laboratory and property. (b)(7)(C) viewed a video tape taken during the inspection.

2. (b)(7)(C) advised Investigator (b)(7)(C);(b)(7)(C);(b)(7)(C);(b)(7)(C)) that he was interested in doing an on-site inspection of SHULGIN's property.

INDEXING SECTION:

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D. REPORTR S ales Data fromf ALDRI Dy ALEXANDER SHULGIN RESEARCH I			ANY,	INC., Milwauk	kee, Wi	C	
DETAILS:							
. Reference is made to Report requesting sales information fr Dr. Alexander Shulgin.	of Inve om ALDRI	estigation CH CHEMIC	n dat CAL C	ed January 25 COMPANY, INC.	5, 1995 Milwa	5, subject aukee, Wis	; file, consin b;
2. Attached is a printout date purchases of 2,5-Dimethoxyphene Office.	d March thylamin	15, 1995, Ne previou	, fro usly	m ALDRICH CHI referred to 1	EMICAL the Sar	reflectin Francisc	ng the two co DEA
). On March 28, 1995, a second equipment from 1/1/93 to the pr March 29, 1995 reflecting 25 tr	esent wa	issued	tolt	he firm. Att	chemica cached	als and ch is a prin	nemical ntout date
. No further action by the	Milwauke	e DEA Off	fice	is deemed neo	cessary	v at this	time.
NDEXING SECTION:				\sim			
. ALDRICH CHEMICAL COMPANY		NADDIS	5 (b)(7)(E)			
. SHULGIN, Alexander		NADDIS	5				
TTACHMENTS:							
LDRICH letter dated March 24,	1995 wit	h enclosu	ires.				
LDRICH letter dated April 10, 1	1995 wit	h enclosu	ires.				
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DISTRICT SAN FRANCISCO	14. A	PPROVED (N	ame an	d Title)			15. DATE
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Drug Enforcement Administration **REPORT OF INVESTIGATION** Page 1 of 2. CROSS 1. PROGRAM CODE RELATED FILES 3. FILE NO. 4. G-DEP IDENTIFIER (b)(7)(E) (b)(7)(E) (b)(7)(C);(b)(7)(F) 6. FILE TITLE 5. BY: (b)(7)(C);(b)(7)(E) AT: Investigator San Francisco, CA 8. DATE PREPARED 7. Closed Requested Action Completed Action Requested By: March 9, 1995 9. OTHER OFFICERS: 10. REPORT RE: Dr. SHULGIN's DEA Renewal Application, DEA (b)(7)(E) (RA40) DETAILS: 1. On March 8, 1995, Dr. SHULGIN's attorney (b)(7)(C) telephonically contacted (b)(7)(C);(b)(7)(F) tigator and requested information on the status of Dr. SHULGIN's renewal cation for registration as an Analytical Lab, Schedules 1-5. (b)(7)(C) also also stated that he received a call from Dr. SHULGIN's associate, (b)(7)(C) (b)(7)(C) asked Investigator $\binom{(b)(7)(C),(l)}{b(7)(F)}$ if an AUSA was requesting a grand jury relating to the investigation of Dr. SHULGIN or (b)(7)(C) Investigator (b)(7)(C)(b) responded that he was not aware of a grand jury inquiry at this time. (b)(7)(C);(b) contacted (b)(7)(C) 2. On March 9, 1995, Investigator (7)(F) . ODOC regarding SHULGIN's renewal application. (b)(7)(C) located the subject application and stated that she was maintaining the application because there is an Administrative Code 6 placed on the registration based on a pending Show Cause action against SHULGIN'S DEA registration. (b)(7)(C) faxed a copy of SHULGIN's renewal application to the DEA SFFD. The application is dated January 27, 1995. SHULGIN failed to note on his application that he had his DEA Schedule 1 Researcher registration revoked in 1977 by the DEA and his stated Schedule 1 research authority revoked by the California Research Advisory Panel. **ATTACHMENTS:** 1. SHULGIN DEA Renewal Application INDEXING SECTION: SHULGIN, Alexander - NADDIS((b)(7)(E) b)(7)(C);(b)(7)(E) (b)(7)(C);(b)(7)(F) 11. DISTRIBUTION: 13. DATE REGION 15. DATE DISTRICT OTHER AMRI, ODOD' DEA Form - 6 (b)(7)(C DEA SENSITIVE (May 1980) DRUG ENFORCEMENT ADMINISTRATION

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10. REPORT RE: Alexander S	HULGIN, Chem	icals dumped	on property (RA4	0)	j.
and that "The Lab result the Mercury level was a very little money. 3. On March 1995, Inves (b)(7)(C) regarding possible would look into the poss	vestigator (7 County Heat er SHULGIN, SHULGIN's re rant. Durin, into the gr ere taken by conducted by hed to this the attached documenting s showed no little high. tigator (7)(C); federal vio	th Services 1 see attachmen sidence on 10 g the service ound on his p Hazmat spect GTEL Environ report. d copy of a that SHULGIN hazardous was "The letter (b) contacted S lations in th	t #1. A crimina /27/94 in conjun of the warrants roperty includin alists pursuant mental Laborator etter from DA (D)(7) paid \$3,000 doll te violations ex also states that upervisory EPA A is matter. S/A	enting the en l environment action with th SHULGIN stat ag the heavy m to the warran fies, Inc. A ()(C) ars to cover ars to cover ars to cover are for one at SHULGIN cla (b)(7)(C);(b)(7)(F) (b)(7)(C);(b)(7)(F) (b)(7)(C);(b)(7)(F) (c) (c) (c) (c) (c) (c) (c) (c	al search e service o ed that he metal t. Analysic copy of] to Hazmat Hazmat cost spot where ims to have that he
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(7)(C)		
2. DEA Statement		
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0. REPORT RE:		lts of STRL Exhibits 29			ibits resulti	ng from Shu	ılgin Warrants,
DETAILS:							
ULIAILO.							
1. Referen	nce is	made to the	attached	DEA-7's dog	menting the	results of	the DEA Special
							g the Warrants a
				oratory, see			, ,
			L				
2. See att attachment		DEA STRL men	ios summa	rizing drug	analysis of d	rug exhibit	ts 29-47, see
ue caentile li c	fl Kur 📽						
3. STRL ar	nalysis	of drug exh	ibits 29	-47 are as f	ollows:		
Exhibit #	Lab #	-	Act	ive Ingredie	nt	Drug	Schedule
29	A1847	No co	nt rolled	substances	ietected	None	
30	A1848	Trans	-isoapio	1 (non contr	olled precurs	or chemical	Sch. 1
31	A1849			-4-bromopher		Sch.	I
32	A1850		100	dioxyampheta	nine HCl	Sch.	I
33	A1851		line HCl			Sch.	
34	A1852		line Sul	Construction of Construction		Sch.	
35	A1853			dioxyampheta	nine HCl	Sch.	
36 37	A1854		line HC1	1 1		Sch.	
38	A1855 A1856		line HCl		otenine char	Sch.	
39	A1857			dioxymethampl dioxymethampl			
40	A1858			dioxymethampl			
41	A1859			ne HC1 (PCP)	recourse our	Sch.	
				ne HC1 (PCP)		Sch.	
42	A1960			1 and Ephedri	ne HCl	None	
43	A1861			1 and Ephedri		None	
44	A1862			dioxyamphetam		Sch.	1970 - C
45	A1863	3,4-M	ethylene	dioxymethampt)(7)(C);(b)(7)(F)	etamine HC1	and Sch.	I
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		Methorphan HCl		Sch. I
46	A1864	Psilocin and Psilocybin		Sch. I
47A	A1865	d-methamphetamine (Salt H	Form Not Determine	
47 B		d-methamphetamine (Salt H		
		site investigation of Dr. SHULC		
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Page 216

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Action Requested By:			January 31,	1995	
OTHER OFFICERS:					
0. REPORT RE: Meeting with AU	SA (b)(7)(C)	(PM40))		
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AUSA (b)(7)(C) has stated	that che	is also into	rested in pros	anuting Dr. A	lovendon
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REPORT OF INVESTIGATION Page 1 of 1 2. CROSS 1. PROGRAM CODE 3. FILE NO. 4 G.DEP IDENTIFIER RELATED FILES (b)(7)(E) 5. BY: (b)(7)(C);(b)(7)(F) (b)(7)(E) (b)(7)(C) Investigator AT: San Francisco, CA 7. Closed Requested Action Completed 8. DATE PREPARED January 31, 1995 Action Requested By: TFA (b)(7)(C);(b)(7)(F) 9. OTHER OFFICERS: Peyote Cactus Seized From Dr. SHULGIN's Residence Exhibits 1-6, Case (b)(7)(E) (RA40) 10. REPORT RE: DETAILS: 1. On October 27, 1994, during the sprvice of an Administrative Inspection Warrant by the DEA SFFD Diversion Unit and Clan LaW Unit at Dr. SHULGIN's residence/laboratory, 1483 Shulgin Road, Lafayette, CA, TFA (b)(7)(C):(b)(7)(F) seized 6 peyote cactus, as drug exhibits 1-6 under case file (b)(7)(E) 2. Reference is made to the attached copies of DLA-7's documenting the analysis of drug exhibits 1-6, case #(b)(7)(E) identifying the six exhibits as peyote cactus. ATTACHMENTS: 1. Copies of DEA-7's, Exhibits 1-6 INDEXING SECTION: (b)(7)(E) LGIN, Alexander - NADDIS (b)(7)(C);(b)(7)(F) 11. DISTRIBUTION: (b)(7)(C) 13. DAT REGION DISTRICT OTHER MDT onon ruisor DEA Form - 6 (b)(7)(C) DEA SENSITIVE (May 1980) DRUG ENFORCEMENT ADMINISTRATION This report is the property of the Drug Enforcement Administration. ther it nor its contents may be disseminated outside the agency to which loaned. Previous edition may be used.

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		Milwaukee R	.lo.		January 2	5, 1995		
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10. REPORT	RE: Dr. S	HULGIN purc	hase of 1	110gram of I	recursor to S	chedule	I(2CB)(R	A40)
			-	r				
				1				
DETAILS:								
		-	1210					
l. On Ja	anuary 19,	1995, C/S)(7)(C)	, Milv	waukee, WI Fie	ld Divi	sion conta	acted D/1
and and	reported	a suspicio	us order	of 2,5 Dime	thoxyphenethy	lamine	97% by A1	exander
MULGIN I	ion Alexan	uer snurgin	researci	1 Inst., 148	33 Shulgin Roa	a, Laia	yette, CA	ě .
)				
lect. #	Order #		Drug		Qty Ship	ped	Date	
	gfearnell - Charge - Charge an Inger an Inger an							
3987	595214	2,5-Dimet	hoxyphene	ettylamine,			/27/93	
	770368				100gm	06	/04/93	
) On I	10	1995, Inve	ationtar	(b)(7)(C);(b)(7)(F)	icted STRL Che	(b)(7	')(C)	ala da t
				niecursor t	o schedule I	MISC	-2 5	who advis
limethoxy	phenethyl	amine (2CB)	(b)(7)(C)		that 100 gra			
Dimethoxy	phenethy1	amine could	conse rva	tively yiel	d 80-90 grams	of 2CB	using Bro	omine and
cetic ad	cid. Refe	rence is mad	de to DEA	I HOI dated	November 3, 1	994, sa	me file nu	umber and
itle as	this repo	rt, Re: Seco	ond Admir	istrative 1	nspection War	rant (1	0/27/94),	Alexande
SHULGIN-A	analytical	Laboratory	, DEA A	(/)(E) D1	rug Exhibit #4	• DEA	STRL Lab	identified
Mug Exni	bit #4 as	Z, 5 Dimetho	bxy-4-bro	monthemethy1	amine HCL (Sc Dr. Shulgin h	hedule	I 2CB). V	then exhile
and that	SHULGIN	said he man	ifactured	1 01/2//94,	the effect	ad 3.42	grams of	(2CB)on
ats and	ultimatel	v on humans	for trea	ting mental	illness. Dr	- SHILC	IN stated	that he
ynthesiz	ed approx	imately 10	rams of	20B in the	last two year	s. Dr.	SHULGIN &	stated the
e did no	t have real	cords to doo	cument th	ne manufactu	re of 2CB. I	t shoul	d be noted	d that Dr.
HULGIN H	ad his DEA	A Schedule	l researc	h registrat	ion revoked b	y DEA i	n 1977.	
Pofer	tongo is	ada ta Da						
urchase	of 100 gr	aue to Dr. 3	imothory	purchase 1	og book that line h oted in	indicat	es the Ald	irich
he log e	entry india	cates "CALL	from (b)(7)	C) II FO	garding Aldri	ch nure	1 OI EN19	s report.
hemical.	See atta	sched copy (f Dr., SH	ULCIN'S PUL	chase log boo	k, ptiz	Chment #2	Ject
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Page 2 of 2		
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. Based on the above, the DEA SFFD requests	complete sales info	rmation from Aldrich 1
r. SHULGIN.		
TTACHMENTS:		
Albeich Charles I Dates Dates		
Aldrich Chemical Purchase Record		
. Dr. Shulgin Logbook Entries		
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SHULGIN, Alexander - NADDIS: (b)(7)(E)		
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. REPORT R	E: Results of	STRL Analy	sis o	f Drug Exhib	its resulti	ng fro	om Shu	lgin War	rants,
		its 1-28 (R				0		ŭ	
				 1	<i>6</i>				
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Refere	nce is made t	o the attac	hed D	A-7's docum	enting the	result	ts of	the DEA	Special
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See at	tached DEA ST	RL memos su	mma ri	zing drug an	alysis of d	rug er	shibit	s 1-28.	
1 * * *4	T 1						_		
hibit 🕴	Lab #		Activ	e Ingredient			Drug	Schedule	
1	A1819	2 5-dimerb	nvv-h	odopheneth	vlamino		Sch	I Analog	
2	A1820			oxyephedrone				I Analog	
3	A1821			oxymethamphe			Sch.		
4	A1822			-promophenet			Sch.		
5	A1823			ethylenediox					
6	A1824			oxyamphetami					
7	A1825						Sch.		
8	A1826			thylenedioxy		RCJ.	Sch.		
9				oxyamphetami			Sch.		
9	A1827			y])-3,4,meth			Sch.	I Analog	
100 b	41000			e hydrochlor			0.1		
10a,b,	A1828	J,4-Metnyl	enedri	ozymethamphe	camine HCI		Sch.	L	
d,f,g		2 5 01-01			had - 1- 170	1	0.1	-	
10c,e	A1000		oxy-4	-promophenet	nyramine HC	T	Sch.	L	
11	A1829	NNDD	14	L, L			None		
	A1830			oxymethamphe			Sch.		
13	A1831			oxymethamphe			Sch.		
14	A1832			drocannabino.			Sch.		
15	A1833			oxymethamphe		illate			
16a	A1834			oxyamphetami			Sch.		
16b 17	11925			oxymethamphe			Sch.		
	A1835			-bromphenetl C);(b)(7)(F)	ny lamine		Sch.	L	T
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			and a deal of the product of the second s		
		(Salt Not Determined)			
18	A1836	Mescaline HC1		Sch.	
19	A1837	3,4-Methylenedioxyamphet	amine HC1	Sch.	
20	A1838	Mescaline HCl		Sch.	
21	A1839	3,4-Methylenedioxymethan		Sch.	I
22	A1840	3,4-Methylenedioxyethyla	mphetamine HCl	Sch.	1
23	A1841	Mescaline HCl		Sch.	I
24	A1842	2,5-Dimethoxy-4-bromophe	encthylamine	Sch.	1
		(Salt Not Determined)			
25	A1843	3,4-Methylenedioxymetham	phetamine HC1	Sch.	I
26	A1844	Mescaline Sulfate		Sch.	
27	A1845	2,5-Dimethoxy-4-bromophe	nethylamine HCl	Sch.	
28	A1846	3,4-Methylenediexymetham	phetamine HCl	Sch.	
TACHM	ENTS:				
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7. Closed Requested Action Completed			8. DATE PREPARED December 29, 199)4

10. REPORT RE:

Alexander SHULGIN's reported controlled substances inventory as of 11/31/94 (RA40)

DETAILS:

1. On October 31, 1994, the DEA SFFD Diversion Unit terminated their Administrative Inspection of Alexander SHULGIN'S DEA registered location: 1483 Shulgin Rd., Lafayette, <u>CA, where SHULGIN maintains his residence and chemical laboratory</u>, DEA registration (b)(7)(E) Analytical Lab, Schedules I-V. At the end of the inspection, D/I (b)(7)(C)(b)(7)(C)(b)(7)(C)(b)(7)(C)(b)(7)(C)(b)(7)(C)(c)) asked Alexander SHULGIN if he would search through his residence and laboratory and inventory all controlled substances in his possession.

2. Reference is made to the attached correspondence mailed from Alexander SHULGIN received at the DEA SFFD on November 5, 1994. The single page is headed, "Inventory of Controlled Substances being held at 1483 Shulgin Road, Lafayette, CA as of October 31, 1994". (see attachment #1) The inventory contains the following information.

Drug	Schedule	Source (if known)	Approximate Weight	
Amobarbital	C-11	(b)(7)(C)	14 g.	
Amobarbital	C-II	Sigma	50 g.	
a-Ethyltryptamine	C-I	Sigma	25 g.	
Barbital	C-IV	3	2 g.	
Chloral Hydrate	C-IV	Signa	100 g.	
Chloral Hydrate	C-IV	Mallinckrodt	400 g.	
d5-Cocaine	C-II	(b)(7)(C)	() trace	
d5-Cocaine	C-II	_	trace	
Hexobarbital	C-III?	?	WH 10 02 8:3	
Meprobamate	C-IV	5 0 5 9 R	Je WM 10 52 g.	
Methcathinone	C-I	Sigma	1 g.	
Hethcathinone	C-I	ATS	900 mg.	
Nethoxexital	C-IV	(b)(7)(C)	500 mg,	
Midazolam	C-IV		10, mg	
Midazolan	CIV		10 mg.	P5.
11. DISTRIBUTION:		(b)(7)(C);(b)(7)(F)		13. DATE
REGION		_		in balan
			tator	14-1114
DISTRICT				15. DATE
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OTHER AMRI, OF	DOD		p Supervisor	1717
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Page 2	of 2			
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			November 31,	1994
Midazolam Pentobarbital Phenobarbital Secobarbital Secobarbital	C-IV C-JI C-IV C-II C-II C-I	(b)(7)(C) ? Sigma ? ATS	2	D ng. 2 g. 2 g. 5 g. 2 g. 3 g.

samples that might contain scheduled drugs (my log #22201 to 22231) were taken by (D)(7)(C);(D)(7)(F) (D)(7)(C):(D)(7)(F) on October 31, 1994. This statement refers to the anonymous samples surrendered by Alexander SHULGIN to DEA on October 31, 1994 (see DEA KOI same file number and title as this report dated November 10, 1994 Re: Continuation of Second Administrative Warrant, Drug Exhibits 17-47). Alexander SHULGIN did not have records documenting the receipt of any of the surrendered items. The surrendered drugs were forwarded to the DEA STRL for analysis.

(b)(7)(C);(b)

3. On November 10, 1994, Investigator $(7)^{(F)}$ telephonically contacted Alexander SHULGIN at his residence and asked him to provide receipt records for the controlled substances noted in his October 31, 1994 inventory. Alexander SHULGIN replied that he has retained Lawyer (b)(7)(C) and that all future questions should be directed to his attorney. On November 10, 1994, $D/I \frac{(b)(7)(C)(b)}{(7)(C)}$ attempted to contact attorney (b)(7)(C) and left a message with his office. Subsequently, (b)(7)(C) contacted $D/I \frac{(b)(7)(C)(b)}{(7)(C)}$ and stated that he would have to review Federal Controlled Substance Regulations before responding to DEA's request for controlled substance receipt records. As of December 29, 1994, neither (b)(7)(C) or Alexander SHULGIN has contacted the SFFD Diversion Unit regarding this matter.

ATTACHMENTS:

1. SHULGIN's Controlled Substance Inventory as of October 31, 1994

1. Stulgin, Alexander - NADDIS: (b)(7)(E)

DEA Form - 6a (b)(7)(C)

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REPORT OF INVEST	IGATION			Page 1 of 2
PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE NO. (b)(7)(E)	4. G-DEP IDENTIFIER
5. BY: (b)(7)(C):(b)(7)(F) AT: Investigator San Francisco, CA		(b)(7)(Ċ);(b)(7)(E)	
7. Closed Requested Action Completed			8. DATE PREPARED November 18,	1994

10. REPORT RE: Use of Internet Computer System by Dr. SHULGIN and others to communicate drug information and deliver drugs (RA40)

DETAILS:

1. Reference is made to all prior ROI's under this file number and title regarding a joint DEA, State and Local investigation of DEA registrant Alexander SHULGIN's involvement in unauthorized use and manufacture of schedule I controlled substances and their analogs.

2. On October 27, 1994, the DEA SFFD Diversion Unit, DEA SFFD Clan Lab Group, assisted by (b)(7)(C) of the Special Testing Laboratory, the Contra Costa County District Attorneys Office, Sheriffs Department, Fire Department and Health Department worked jointly in serving a DEA Administrative Inspection Warrant on Dr. SHULGIN'S DEA registered location. This enforcement effort revealed that SHULGIN was illegally manufacturing and researching schedule I controlled substances, failed to maintain required records and disposed of toxic chemicals including mercury into the ground on his property. SHULGIN is also believed to be involved in illegal human drug testing.

3. On October 28, 1994, DEA Diversion with assistance from the SFFD Clan Lab Group continued its inspection of Dr. SHULGIN's DEA registration and learned that Dr. SHULGIN used the Internet Computer System to obtain and analyze foreign and domestic samples of suspected "Nexus" (schedule I 2CB) and other drugs. Dr. SHULGIN reported his analysis via the Internet System.

4. Dr. SHULGIN provided the information regarding Internet pursuant to questions by Investigators regarding numerous suspected controlled substances including pills, capsules and powders found in Dr. SHULGIN's residence. Dr. SHULGIN stated that he received these items from contacts through Internet, anonymous sources and associates who Dr. SHULGIN refused to identify.

5. Dr. SHULGIN stated that he received schedule I 2CB "Nexus" from South Africa. Within the last year, Dr. SHULGIN also received samples of 2CB from E. Germany. Dr. SHULGIN stated that his associate in Germany has stated that 2CB is flooding the German illicit drug market. Dr. SHULGIN stated that he examined the 2CB sample from Germany and

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DISTRICT		tor	15. DATE
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Drug Enforcement Administration

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	REPORT OF INVESTIGATION (Continuation)	1. FILE NO. 2. G-DEP IDENTIFIER (b)(7)(E) (b)(7)(E) 3. FILE TITLE (b)(7)(C)
4.	Page 2 of 2	
5. PROG	RAM CODE	6. DATE PREPARED November 18, 1994

manufactured in South Africa. Several suspected samples of 2CB and numerous other drug samples were collected from Dr. SHULGIN and forwarded to Special Testing for analysis. Dr. SHULGIN did not maintain records on these substances. See DEA ROI, same file number and title as this report, dated 11/10/94 re: Continuation of Second Administrative Inspection Warrant.

6. Dr. SHULGIN also stated that he has received and analyzed samples of Dextromethorphan aka "Disco Biscuit" and "DXM" from Searcle, Washington. Dextromethorphan is the active ingredient in over the counter cough syrup. Dr. SHULGIN made contact with the Seattle source through Internet and reported his drug analysis through Internet.

7. Dr. SHULGIN stated that he communicates on Internet using the computer command: alt.drugs. Dr. SHULGIN stated that there are sometimes 200 drug related entries in this system per day and at one time ten references to "Nexus" per day.

8. On November 1, 1994, the DEA accessed the Internet System and executed the command "alt.drugs". This computer file contains extensive material regarding the manufacturing of controlled substances. The file also contains instructions for posting information and making e-mail contacts. The file appears to be managed by an individual identifying themself as [b)(7)(C) The DEA and State Warrants on SHULGIN's residence were also reported on Internet via command alt.drugs (see attached

(b)(7)(C);(b)(7)(E)

ATTACHMENTS:

1. Excerpts from Internet

copies of excerpts from Internet, attachment #1).

INDEXING SECTION:

DEA Form - 6a (b)(7)(C)

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	2. CROSS FILE	RELATED FILES	3. FILE NO. (b)(7)(E)		4. G-DEP IDENTIFIER b)(7)(E)
5. BY: (b)(7)(C);(b)(7)(F)		(b)(7)(C);(l			
AT: Investigator					
San Francisco, CA					
7. Closed Requested Action Con			8. DATE PREPA	RED	
Action Requested By:			November 1		
9. OTHER OFFICERS:					
10. REPORT RE: Request for (Analytical	Order to Show Lab, DEA (b)(7)(E		lexander SH les I-V)	ULGIN	
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-V, 1483 Shulgin Road, La					
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A. The DEA inspections mauthorized Schedule 1 re					
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	REPORT OF INVESTIGATION	1. FILE NO. (b)(7)(E)	2. G-DEP IDENTIFIER (b)(7)(E)
4	(Continuation)	3. FILE TITLE (b)(7)(C)	
	Page 2 of 3		
S. PROG	RAM CODE	6. DATE PREPARED November 14	, 1994

B. On September 27, 1994 and October 27, 1994, Alexander SHULCIN was found to be conducting Schedule I Research not authorized by his analytical lab registration in violation of 21 CFR 1301.22(b)(3).

During the DEA Inspections of Dr. SHULGIN's laboratory/residence, Dr. SHULGIN stated that he has conducted and was currently conducting research with Schedule I controlled substances and their analogs, specifically 2CB AKA Nexus, Methcathinone and MDMA. Dr. SHULGIN was researching these compounds for use in treating mental illness. See DEA ROI's file title (D(7)(C), Case (D)(7)(E), Re: Administrative Inspections of Alexander SHULGIN (see attachment #2).

C. Alexander SHULGIN did not maintain controlled substance receipt, manufacturing or destruction records as required by 21 CFR 1304.27 in violation of 21 USC 842(a)(5).

Alexander SHULGIN failed to maintain records documenting his manufacture of Schedule I 2CB-"Nexus", MDMA, LSD, MDA and MMDA-2. Alexander SHULGIN also failed to document samples of controlled substances he received from associates and anonymous individuals. See DEA ROI, Case (b)(7)(E) title (b)(7)(C), Re: Administrative Inspection Warrants, Alexander SHULGIN, (see attachment #2).

D. Alexander SHULGIN conducted unauthorized human drug research in violation of state and federal food and drug laws.

On October 27, 1994, Dr. SHULGIN voluntarily supplied DEA with what he called a patent titled "Information concerning the invention of a new antidepressant" (see attachment #3). According to SHULGIN, this document discusses the use of Schedule I methcathinone to create a methcathinone analog for use as an antidepressant. See page 7, "Human Pharmacology" where recent human drug trials in 4 individuals are discussed. The individuals reportedly have experience in testing MDMA.

(b)(7)(C)

Alexander SHULGIN has failed to get Investigational New Drug (IND) Authority from the FDA as required by Title 21 Part 312. Alexander SHULGIN stated that this patent information has been submitted to $\frac{(b)(7)(C)}{(C)}$ Patent Attorney. Neurobiological Technologies Inc., 1440 Regatta Blvd., Richmond, CA 94804 $\frac{(b)(7)(C)}{(D)(7)(C)}$

E. Alexander SHULCIN has a violative history with the State of California and the DEA.

Alexander SHULGIN had his Schedule I authority revoked by the California State Research Advisory Panel in 1977 for illegally distributing mescaline, conducting unauthorized Schedule I research and illegal human drug testing (see attachment #4). Based on this information, the DEA revoked Alexander SHULGIN's Schedule I researcher

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	REPORT OF INVESTIGATION	1. FILE NO. 2. G-DEP IDENTIFI (b)(7)(E) (b)(7)(E)
	(Continuation)	3. FILE TITLE (b)(7)(C)
l.	Page 3 of 3	
5. PROGI	RAM CODE	6. DATE PREPARED November 14, 1994

registration, DEA number (b)(7)(E) (see attachment #5). No action was taken against his Schedule 1-V Analytical Lab Registration.

2. Possible witnesses in this matter:

(b)(7)(C):(b)(7)(F) DEA Diversion Investigator, SFFD Phone: (b)(7)(C):(b)(7)(F)	[(b)(7)(C);(b)(7)(F) DEA C/S S/A Clan Lab Group Phone: ^{(b)(7)(C);(b)(7)(F)}
(b)(7)(C) DEA Chenist, STRL, McLean, VA Phone: (b)(7)(C)	5	(b)(7)(C):(b)(7)(F) S/A Clan Lab Group Phone: (b)(7)(C):(b)(7)(F)
(b)(7)(C) California Research Advisory Panel Phone: (b)(7)(C)		(b)(7)(C);(b)(7)(F) TFA Agent Phone: (b)(7)(C);(b)(7)(F)
(b)(7)(C) California Research Advisory Panel Phone: (b)(7)(C)		

3. Based on the information noted above, it is recommended that this matter be forwarded to Chief Counsel for a request for an Order to Show Cause against DEA Number (b)(7)(E) issued to Alexander SHULCIN. The continued registration of Dr. SHULCIN is not in the public interest per Title 21 USC 824(a)(4).

ATTACHHENTS:

- 1. DEA ROI, Re: Seizure of Peyote
- 2. DEA ROI's
- 3. Drug Patent
- 4. CRAP Schedule I Revocation Letter, Dated 1977
- 5. DEA Schedule J Research Revocation Letter, Dated 1971

INDEXING SECTION:

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HULGIN.	Alexander ·	 NADDISNER	
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(May 1980) - 63 (b)(7)(C)

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REPORT OF INVEST	IGATION			Page 1 of 6	
. PROGRAM CODE	2. CROSS	RELATED FILES	3. FILE NO. (b)(7)(E)	(b)(7)(E)	TIFIER
by: Trivestigator San Francisco, CA		(b)(7)(C	6. FILE TITLE :);(b)(7)(E)		
7. Closed Requested Action Completed Action Requested By: 9. OTHER OFFICERS: S/A (b)(7)(C);(b)(7)(F)			8. DATE PREPARED November 10,	1994	

10. REPORT RE: Continuation of Second Administrative Inspection Warrant, Alexander SHULGIN, Analytical Laboratory, 10/31/94, Drug Exhibits 17-47 (RA40)

SYNOPSIS:

This report documents the continuation and termination on 10/31/94 of the second Administrative Inspection Warrant initiated on 10/27/94 of Alexander SHULGIN, Analytical Lab, DEA (b)(7)(E). Schedules I-V, 1483 Shulgin Road, Lafayette, CA 94549. On September 27, 1994, October 27, 1994 and October 31, 1994, the DEA executed Administrative Inspections of Alexander SHULGIN's laboratory/residence based on his public statements regarding research in Hallucinogens (High Times Article August 94) and a review of Dr. SHULGIN's violative history with the DEA. The inspections and subsequent investigations reveal that SHULGIN is conducting unauthorized Schedule I research and failed to maintain controlled substances receipt, manufacturing and destruction records. On the October 27, 1994 inspection by the DEA, Alexander SHULGIN was found to be in illegal possession of Schedule I Peyote plants. This report documents the collection and surrender of samples of suspect controlled substances Dr. SHULGIN received In the mail. Dr. SHULGIN failed to Mer Round to DEA STRL for analysis.

DETAILS:

1. Reference is made to DEA ROI same file number and title as this report dated November 3, 1994, re: Second Administrative Inspection Warrant, Alexander SHULGIN, Analytical Laboratory, 10/27/94.

2. This report documents the continuation and termination on 10/31/94 of the second Administrative Inspection Warrant initiated on 10/27/94 of Alexander SHULGIN, Analytical Lab, DEA (b)(7)(E), Schedules I-V, 1483 Shulgin Road, Lafayette, CA 94549.



Drug Enforcement Administration

REPORT	OF INVESTIGATION	1. FILE NO. (b)(7)(E)	2. G-DEP IDENTIFIER
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•. Page c	of 6		
5. PROGRAM CODE	¥	6. DATE PREPARED November 10,	1994

3. On October 31, 1994 at approximately 10:00a.m., D/I (F) and S/A (D)(7)(C);(b)(7) and S/A (D)(7)(C);(b)(7)(F) met with Dr. SHULGIN at his residence/laboratory to continue their inspection of Dr. SHULGIN's registration.

4. On the October 27, 1994 inspection, DEA Investigators observed what Dr. SHULGIN identified as anonymous samples suspected to be controlled substances scattered around a room located in the rear of Dr. SHULGIN's residence. Dr. SHULGIN identified this room as Basement #4 (see DEA ROI noted in section one of this report paragraph #9). Dr. SHULGIN did not have any records documenting the receipt of these samples. On October 27, 1994, $D/1[\frac{b(7)(C)(b)}{M(F)}]$ asked Dr. SHULGIN to collect and inventory all suspected controlled substances in Basement #4. On October 31, 1994, Dr. SHULGIN gave $D/1[\frac{b(7)(C)(b)}{M(F)}]$ a copy of this inventory, (attachment #1). Dr. SHULGIN voluntarily surrendered the suspect drugs noted on the inventory to $D/1[\frac{b(7)(C)(b)}{M(F)}]$ see attached DEA 12, attachment #2). Next to each exhibit number noted below is Dr. SHULGIN's inventory number and comments on each drug sample.

Exhibits 17-47

EXHIBIT #17 (22212)

My writing -"HCL salt MLS-2CB" residues from lab for IR. Probably contains 2CB.

EXHIBIT #18 (22226)

Blue-line ziplock a couple hundred mg chunk of hard white chrystal - contains label saying "Orange Texas Hydrochloride "Rock" no idea who or what.

EXHIBIT #19 (22219)

5x5cm manila envelop labelled "15x100 MDA" containing 15 total #3 gel caps - not analyzed - suspect? No idea - seems unlikely that this is the d-isomer of MDA - it would be hard to make and it is not very potent. Unweighed, un-analyzed - into two vials, taped together.

EXHIBIT #20 (22214)

As above (2213) Square paper envelop labelled "Mesc #2" containing wax paper containing highly crystalline white solids . not analyzed. Suspect mescaline sulfate. 10mg.

EXHIBIT #21 (22218)

As above, white envelope labelled "AD" containing wax paper (discarded) containing 15mg off white solids - not analyzed - no guess as to what it is.

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REPORT OF INVESTIGATION (Continuation)	1. FILE NO. 2. G-DEP IDENTIFIER (b)(7)(E) (b)(7)(E) 3. FILE TITLE (b)(7)(C)
4. Page 3 of 6	
5. PROGRAM CODE	6. DATE PREPARED November 10, 1994
EXHIBIT #22 (22209) Vial containing a couple of milligrams of a grey	(b)(7)(C)
what or from where - not analyzed.	sold - labelled no memory of
EXRIBIT #23 (22228)	1
Blue-line ziplock several chunks of hard white cr "Rock" no idea who or where.	ystals label "synthetic hydrochloride
EXHIBIT #24 (22211)	
ML's from an old 2C-B synthesis. My writing- sam 2C-B.	ple from lab for IR. Probably contains
EXHIBIT #25 (22207)	
"456 mg Loo 08/15/86" white solid - no memory of sheet name - not analyzed.	rom where - no idea of Loo in person or
EXHIBIT #26 (22213)	
Square paper envelop 5cm x 5cm labelled "Mesc #3" crystalline solids (white). Not analyzed. Suspect	contains wax paper containing highly mescaline. Wrappers discarded. 10mg.
EXHIBIT #27 (22210)	
Vial labelled "Nexus ex Frasila" (or Franila) - O	rigin unknown - not analyzed.
EXHIBIT #28 (22220)	
Envelope labelled "MDM Clone MDE? MDOH?" Containing containing loomg brown sticky solids. Not analyz	ng an AL wrapper 3x3cm (discarded) ed. No hint of identity. From whom?
EXHIBIT #29 (22208)	
Plastic egg (discarded) containing a Al foil (dis tablet - not analyzed.	card) containing a microscopic purple (?)
EXHIBIT #30 (22230)	
(L) (7)(0)	
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	REPORT OF INVESTIGATION	1. FILE NO. (b)(7)(E)	2. G-DEP IDENT (FIER
	(Continuation)	3. FILE TITLE (b)(7)(C)	
l.	Page 4 of 6		
5. PROG	RAM CODE	6. DATE PREPARED November 10	, 1994

 $2" \ge 8" \ge 1/2"$ cardboard box, addressed to me with no return address, 1.25 postage, illegible cancel contains I brown bottle (25ml capacity) empty except for a spice smell) also a chalky paper cleverly folded unit containing 10mg. of a tan solid. No analysis. No guesses.

EXHIBIT #31 (22223)

Sealed envelop (white, letter size) labelled "2CB" contains AL foil, which contains a few mgs of a fluffy white crystal. Maybe 2C-B?

EXHIBIT #32 (22224)

Scaled envelop (white, letter size) labelled "MDMA" containing aluminum foil containing 50mg slightly pink tabs. Maybe MDMA? Not analyzed.

EXHIBIT #33 (22229)

Elue-lined ziplock several hundred milligrams of a flaky white crystal. Label "Organic "Texas" hydrochloride FLAKE". No idea who or when. Maybe the 22226-22228 also said organic rather than orange.

EXHIBIT #34 (22215)

As above (2213) square paper labelled "S Mesc SU4" again wax paper (both discarded) containing fine white crystalline solid - possible mescaline sulfate not analyzed. Source? 10 mg.

EXHIBIT #35 (22222)

Scaled white envelope labelled MDMP containing an Al wrapped sample 30mg off white solids no hint of what it may be - no idea of from where same solids - discard aluminum.

EXHIBIT #36 (22216)

As above - white paper square envelop labelled "GI Mesc SO4" containing waxed paper (paper discarded) containing lOmg white crystalline solids not analyzed. Possibly mescaline sulfate.

EXHIBIT #37 (22227)

Blue-line ziplock 300? mg shiny crystal - contains label "Orange Texas Flake HC Var2" No idea who or where.

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				-4

Drug Enforcement Administration

	REPORT OF INVESTIGATION (Continuation)		2. G-DEP IDENTIFIER	
4.	Page 5 of 6			
5. PROG	RAM CODE	6. DATE PREPARED November 10, 1994		

Envelop (airmail) from Germany (Frankfurt postmark?) Containing cleverly folded paper red edges containing 10mg white xtabs. Paper labelled "Sample B-510". No analysis; no idea.

EXHIBIT #39 (22205)

Petri dish with "118 mg early Berlin, whenown salt - dated 11/86 - possibly a salt of MDMA? Not yet analyzed. Received from someone in Germany.

EXHIBIT #40 (22217)

As above - white paper envelope labelled "G HDA 504". (5x5cm) containing wax paper (discarded) containing 150mg off white granular solids.

EXHIBIT #41 (22201)

Mail, from Hawaii - 8 yellow tabs of 3 reddish tabs, called "T" Golden Power - chip of purple from see-jesus description & immobility, maybe PCP. Not analyzed. Note discarded. Received in 35mm film canister March 1994?

EXHIBIT #42 (22203)

The other of 2 samples (see above) identified by "B" same UPS package. Both samples in microcassette plastic boxes. 4 white tablets.

EXHIBIT #43 (22202)

(b)(7)(C) One of 2 samples (see next one) identified by "A" and a name on the envelop, UPS next day air - received in July or August 1994, eight white biconvex tablets - don't know from where. No idea or hint of what it is.

EXHIBIT #44 (22204)

Aluminum - wrapped pill (pills?) from Spain - note says 20 hour effect, very LSD like and also HDMA-like! Not yet looked at - possibly DOE or DOM? Received early 1994.

EXHIBIT #45 (22221)

(b)(7)(C) Sealed envelope labelled "For Sasha from[(discarded) containing a 200mg tan solids (save) and a couple of smashed gel capsules (about 000).

EXHIBIT #46 (22231)

(b)(7)(C)

DEA Form

(May 1980) - 6a

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	REPORT OF INVESTIGATION	1. FILE NO. 2. G-DEP IDENTIFIER (b)(7)(E) (b)(7)(E)
	(Continuation)	3. FILE TITLE (b)(7)(C)
4.	Page 6 of 6	
5. PROGR	BAM CODE	6. DATE PREPARED November 10, 1994
year EXHI: Samp plas (b)(7)(C) Chai On O	(a few years ago?) From Hawaii - maybe <u>BIT #47</u> (22206) le received from VA Hospital, SF - prob. tic bags - one with a powder. Not analy <u>n of Custody:</u> ctober 31, 1994, the drug exhibits 17-4	in mail box on 08/23 - forgot to record the (b)(7)(C) Not analyzed. ably a drug taken from a VA patient - three zed. Labelled "sample of unknown drug for Dr. 7 were surrendered by Dr. SHULGIN at his , Receipt for Cash or other items, attachment
#2). 1994 Atta Test	$D/I_{7)(F)}^{(0)(7)(C),(0)}$ transported the exhibits to , the exhibits were processed by $I/I_{(D)(7)}^{(b)(7)}$ chment #3). On November 3, 1994, $D/I_{(7)}^{(b)}$ ing Laboratory McLean, VA for analysis.	DEA SFFD for safekeeping. On November 1, (C);(b)(7)(F) (see attached DEA-7's, (7)(C);(b) mailed drugs exhibits 17-47 to DEA Specia
DEA of th want mail SHUL	S/A ^{(b)(7)(C):(b)(7)(F)} and Chemis he suspect 2CE samples but did not want to get them into trouble. SHULGIN sta ed by individuals he communicates with	27, 1994, DEA Inspection, Dr. SHULGIN stated t t (b)(7)(C) that he did know who sent him some to identify the individuals because he did no ted that some of the samples sent to him were via the INTERNET Computer System. Alexander ance receipt records on samples he received as 21 USC 842(a)(5).
SHUL	After collecting the exhibits noted in GIN's residence at approximately 1:00p. ection. The Warrant was returned to th	m., thus terminating the Administrative
ATTA	CHMENTS:	

- Shulgin Inventory
 DEA-12, dated October 31, 1994
- 3. DEA-7's

INDEXING SECTION:

SHULGIN, Alexander - NADDIS: (b)(7)(E)

DEA Form - 6a (May 1980) - 6a (b)(7)(C)

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REPORT OF INVEST	IGATION			Page 1 of 3
. PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE NO. (b)(7)(E)	A G-DEP IDENTIFIER
(b)(7)(C):(b)(7)(F) AT: Investigator San Francisco, CA		(b)(7)(C);(b)(7)(E)	
7. Closed Requested Action Completed			8. DATE PREPARED November 3, 1	
D. OTHER OFFICERS: S/A (b)(7)(C);(b)(7)(F)	3	5/A(b)(7)(C);(b)(7)(F)	, S/A (b)(7)(C);(b)(7	7)(F)

Drug Exhibits 10-16 (RA40)

Analytical Laboratory, DEA Number (b)(7)(E)

SYNOPSIS:

On September 27, 1994, the DEA SFFD served a DEA Administrative Inspection Warrant on DEA Registrant Dr. Alexander SHULGIN's residence where he maintains a DEA Analytical Lab registration, drug schedules I-V, and a chemical laboratory. The inspection revealed that Dr. SHULGIN was conducting unauthorized Schedule I research and failed to maintain controlled substance receipt and manufacturing records. Dr. SHULGIN left for Spain on September 28, 1994. The purpose of this report is to document drug exhibits surrendered by Dr. SHULGIN to DEA on September 27, 1994. The drug exhibits were found in Dr. SHULGIN's library/computer room. The exhibits were subsequently forwarded to DEA Special Testing Lab, McLean, VA for analysis.

DETAILS:

1. Reference is made to the attached copy of Warrant for Inspection (attachment #1) and Affidavit for Administrative Inspection Warrant (attachment #2) in the matter of the Administrative Inspection Warrant of:

Alexander T. SHULGIN Analytical Lab, Dreg Schedule I-V DEA Registration (b)(7)(E) 1483 Shulgin Road Lafayette, CA 94549 (Dr. SHULCIN's residence)

2. The following information is documented in DEA ROI same file number and title as this report, dated September 30, 1994, section 10., regarding controlled substances found in Dr. SHULGIN's library/computer room.

During the DEA Administrative Inspection of Dr. SHULGIN's residence/laboratory on September 27, 1994 by $D/I_{(F)}^{(b)(7)(C),(b)(7)}S/A \xrightarrow{(b)(7)(C),(b)(7)(F)} and S/A \xrightarrow{(b)(7)(C),(b)(7)(F)} Investigator \xrightarrow{(b)(7)(C),(b)(7)(F)} asked Dr. SHULGIN to indicate where he stored his controlled substance records. Dr.$

11. DISTRIBUTION: OPR (b)(7)(C)	(b)(7)(C);(b)(7)(F)		13. DATE 11/18/94
DISTRICT			15. DATE
OTHER AHRI, ODOD		rvisor	10/14
DEA Form (b)(7)(C) (May 1980) - 6			

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		1. FILE NO. (b)(7)(E)	2. G-DEP IDENTIFIER
RE	PORT OF INVESTIGATION	3. FILE TITLE	
	(Continuation)	(b)(7)(C)	
4. Page	2 of 3		
5. PROGRAM CODE		6. DATE PREPARED	
		November 3,	1994
	e Investigators to his librar		
	and file cabinets. In the cer		
various glass	n entering the room, D/I (b)(7)(C); vials_containing powder or lie	wid locared in plain	g glasses containing
cabinet. D/I	(7)(C):(b)() (F)	s vial with white top	containing powder lat
(b)(/)(C) sample	N-Anhydroxy MDMA?" D/I(D)(7)(C),(also observed the fo	llowing items on top
the file cabin	et; three plastic baggies con	taining powder marked	5-28-91 AD/9-18-91-AJ
28-91-AD, and	one commercial package contain	ning Schedule II Marin	ol capsules.
investigator	T(C):(b)(asked Dr. SHULGIN if the	items on top of the c	abinet were controllo
were. D/I(b)(7)(C	ULGIN stated that the items we asked Pr. SHULGIN f he ha	d records on the itors	s not sure what they
(7)(F) SHULGIN re	plied "no". D/I seferr	ed to b glass test tub	e containing tan powe
ed (b)(r)(c)	sample H-hvdroxy MDMA". 1 D/1	(D)(/)(C),(D)(asked who (D)(/)(C)	Was. Dr. SHILCIN
replied, (b)(7)(C)	• D/I (b)(7)(C);(b)(asked Dr.	SHULGIN, M(b)(7)(C) fr	om our lab"? Dr. SEI
responded "yes	", then stated, "I don't want (b)(7)(C) is". D/1 (b)(7)(C):(b)() then a.	to get him in trouble	, that's not (b)(7)(C)
don't know who	D/1 (T)(C) 15" $D/1 (T)(F)$ then a.	Sked S/A (Christian) to t	ake a closer look at
the liquid was	ed ((b)(7)(C) sample N-Anhydroxy in one of the other vials.	Ur SHILCTU stated the	n asked Dr. SHULCIN v
Homolog of LSD	. $D/1_{T/F}^{(b)(7)(C),(b)}$ then set the iter	ns on white paper for	D/T(b)(7)(0)
then asked Dr.	SHULGIN to write next to each	h item what he thought	it was. Next to the
vial marked	sample, Dr. SHULGIN wrote	e, (D)(/)(C) who?" (see a	ttachment #3). D/I(b)
collected the	suspect drugs and gave Dr. SH	ULCIN a DEA-12 (see at	tachment #4).
Exhibit #10 - 1	White powder contained in seve	en glass vials.	
Exhibit #11 -	Yellow liquid contained in the	ree glass vials.	
<u>Exhibit #12</u> - 1	Ian powder contained in three	plastic baggies.	
<u>Exhibit #13</u> - 7	Fan powder contained in glass	vial warked "(b)(7)(C)	sample N-Hydroxy MDMA
<u>Exhibit #14</u> - '	Tablets contained in box.		
<u>Exhibit #15</u> - 5	lan powder in clear baggies.		
<u>Exhibit #16</u> - '	Tan powder and tablet contained	ed in glassine baggie.	
Custody of Evid	dence:		
Drug exhibits	10-16 were surrendered by Dr.	ShullCIN at his residen	nce, 1483 Shulain Rd.
caravette, CA	to D/I (D)()(C),(D) who transported t	the itome to DEA CEED .	for antiday of
UCLOUEI 20, 19:	94, the exhibits were processe 7A for analysis (see DEA-7's,	o by D/ Invitor and Sh	A (7)(F) and mailed to
DEA Form - 68 (b)(7)			

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	REPORT OF INVESTIGATION (Continuation)	1. FILE NO. (b)(7)(E)	2. G-DEP IDENTIFIER	
		3. FILE TITLE (b)(7)(C)		
4.	Page 3 of 3			
5. PROG	RAM CODE	6. DATE PREPARED November 3,	1994	

ATTACHMENTS:

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		nder - NADDIS	: (b)(7)(E)		
DEA-12'	S	scion of Samp.	Γ		
Affidav	it for A	Administrative	e Inspection		
Passed 1	Affidav Shulgin DEA-12' DEA-7's Photogr	Affidavit for A Shulgin Descrip DEA-12's DEA-7's Photographs EXING SECTION:	Affidavit for Administrative Shulgin Description of Samp DEA-12's DEA-7's Photographs EXING SECTION:	Affidavit for Administrative Inspection Shulgin Description of Samples DEA-12's DEA-7's Photographs EXING SECTION:	Shulgin Description of Samples DEA-12's DEA-7's Photographs EXINC SECTION:

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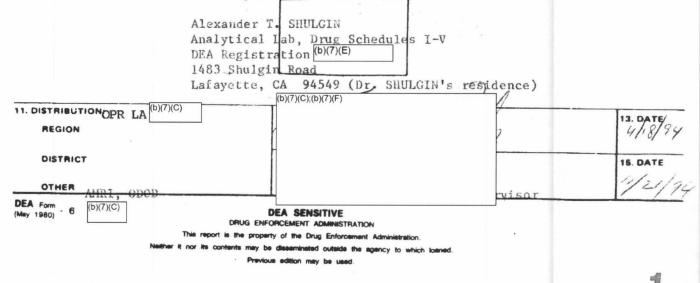
	(b)(7)(E) (b)(7)(E)
	6. FILE TITLE (b)(7)(C);(b)(7)(E)
	8. DATE PREPARED
u	November 3, 1994
S/A's (b)(7)(C);(b)(7)(F) BNE S/A (b)(7)(C);(b)	TFA (b)(7)(C);(b)(7)(F)
	C/A's ^{(b)(7)(C);(b)(7)(F)} , BNE S/A ^{(b)(7)(C);(b)} e Inspection Warr

SYNOPSIS:

This report documents the Administrative Inspection of the registration of Alexander , Schedules I-V, 1483 Shulgin Road, Lafayette, CA SHULGIN, Analytical Lab, DEA (b)(7)(E) 94549, on October 27, 1994. On September 27, 1994, October 27, 1994 and continuing on October 31, 1994, the DEA executed Administrative Inspections of Alexander SHULGIN's laboratory/residence based on his public statements regarding research with Hallucinogens (High Times Article August 94) and a review of Dr. SHULGIN's violative history with the DEA. The DEA inspections and subsequent investigations revealed that SHULGIN is conducting unauthorized Schedule I research and failed to maintain controlled substances receipt, manufacturing and destruction records. Or the October 27, 1994 inspection by the DEA, Alexander SHULGIN was found to be in illegal possession of Schedule I Peyote plants. The DEA SFFD also participated in a State Criminal Search Warrant of Dr. SHULGIN's residence on October 27, 1994 involving possible environmental violations, this investigation is ongoing. Alexander SHULGIN is also believed to be involved in illegal human drug testing. DEA Chemist (b)(7)(C) , Special Testing Laboratory, participated in the execution of the warrant and assisted in the collection of samples subsequently sent to the DEA STRL for analysis.

DETAILS:

1. Reference is made to the attached Warrant for Inspection dated October 26, 1994 (attachment #1) and Affidavit for Administrative Inspection Warrant (attachment #2) in the matter of the Administrative Inspection Warrant of



Page 239

Drug Enforcement Administration

	REPORT OF INVESTIGATION	1. FILE NO. (b)(7)(E)	2. G-DEP IDENT	IFIER
	(Continuation)	3. FUE TITLE (b)(7)(C)		
4.	Page 2 of 6			
5. PROG	RAM CODE	6. DATE PREPARED November 3	, 1994	

2. This Second Administrative Warrant was based on the Administrative Inspection Warrant and Affidavit for Administrative Inspection Warrant served on Dr. SHULGIN on September 27, 1994. Dr. SHULGIN departed the United States for Spain on September 28, 1994, therefore prohibiting a complete inspection. The limited inspection on September 27, 1994 revealed that Dr. SHULGIN was conducting Schedule 1 controlled substance research not authorized by his analytical lab registration. Dr. SHULGIN had his schedule I controlled substance researcher registration revoked by the DEA in 1977. The California Research Advisory Panel also revoked his schedule I research authority in 1977. The September 27, 1994 inspection also revealed that Dr. SHULGIN failed to maintain records on controlled substance samples he received. SHULGIN also advised Investigators that he was pouring chemicals down a hole into the ground of his property. Local EPA authorities were notified (see DEA ROI, $\frac{(D)(7)(E)}{D}$, dated: September 30, 1994)

3. On October 27, 1994, at approximately 9:00a m., DEA Diversion Investigator (b)(7)(C):(b)(7)(F) the DEA SFFD Clan Lab Group assisted by (b)(7)(C) of the DEA Special Testing Laboratory and BNE served the Administrative Inspection Warrant noted in Section 1 of this report (see attached operation plan, attachment #3). At the same time the Contra Costa County District Attorney's Office assisted by the Department of Health and the Fire Department served a Criminal Search Warrant.

4. Initially the DEA Clan Lab Group inspected Dr. SHULGIN's laboratory and "Magic Stockroom" to conduct a hazard assessment. Both areas were ventilated.

5. Dr. SHULGIN advised the Health Department of the various chemicals including Mercury that he poured down a brick lined sump hole located near his laboratory. Dr. SHULGIN also identified where a disposal pipe connected to his lab emptied into the ground. The Health Department took soil samples from both areas for analysis.

6. Once the property was secured, and an environmental assessment was conducted, Diversion Investigator $\frac{(b)(7)(C)}{(7)(F)}$ and STRL Chemist $\frac{(b)(7)(C)}{(7)(F)}$ put on protective clothing and entered the lab located at the rear of the property and conducted an interview with Dr. SHULGIN.

7. Investigator $\frac{(b)(7)(C);(b)}{7\lambda(F)}$ asked Dr. SHULGIN to identify the controlled substances he had on hand in his lab. Dr. SHULGIN identified Schedule I 2CB "Nexus", MMDA2, MDA and Methcathinone. On October 15, 1993. DEA converted Methcathinone from emergency Schedule to permanent Schedule I. Chemist $\frac{(b)(7)(C)}{100}$ took samples of the following suspected Schedule I controlled substances and their analogs. This portion of the inspection was videotaped.

Drug Exhibits 1-9

Exhibit 1 - 2CI - Schedule I Analog - 4 IODO -2,5 Dimethoxyphenethylamine

DEA Form - 6a (b)(7)(C)

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	REPORT OF INVESTIGATION	1. FILE NO. (b)(7)(E)	2. G-DEP IDENTIFIER	
	(Continuation)	3. FILE TITLE (b)(7)(C)		
4.	Page of 6			
5. PROG	RAM CODE	6. DATE PREPARED November 3	, 1994	

Dr. SHULGIN stated that this was identical to Schedule I 2CB except that 4 IDO is substituted for the 4 bromo compound. Dr. SHULGIN stated that he was researching 2CI as a treatment for mental illness.

Exhibit #2 - Methylene Dioxy Methcathinong-- Schodule I analog - 8 grams (on hand)

Dr. SHULGIN stated that he is researching a Methcathinone analog Methylene Dioxy Methcathinone. Dr. SHULGIN had 8 grams on hand. Dr. SHULGIN stated that he made approximately 6.9 grams of Methcathinone earlier in the year but had no record of its manufacture. Dr. SHULGIN produced a page from his log book dated 05/10/94 regarding what Dr. SHULGIN identified as the recovery and repurification of Methcathinone "from several sources". The entry lists 6.9grams of Methcathinone obtained from several sources including 2.01 grams "from somewhere". Dr. SHULGIN stated that he he used the 6.9 grams to get .9grams of purified Methcathinone HCL (see copy of entry, attachment #4).

Exhibit #3 - MDMA - Schedule I

Dr. SHULGIN identified this vial as containing 2nl of a yellow liquid base of MDMA that he made in the last year to study its decomposure to light because he had heard reports that a black "goo" was being found at Clan Lab sites. He was attempting to determine if MDMA turns black when exposed to light. STRL Chemist black because he had heard production of MDMA or Hydroxy MDMA was not considered research. Dr. SHULGIN responded, "It could be, its more for analytical needs. What are the black residues? I admit when you get into the area of going from the Lode or Bromide compound or into other things you are into chemical research if it happens to go through a intermediate of a Scheduled drug. Its a semantic argument, your side has merit". Dr. SHULGIN voluntarily surrendered the vial.

Exhibit #4 - 2CB AKA "Nexus" - Schedule I - Quantity - 3.42grams (on hand)

Dr. SHULGIN stated that he has made approximately 10 grams of 2CB in the last two years. Dr. SHULGIN stated that he is looking at the possible effect of 2CB on receptor sites in rats and ultimately humans for treating mental illness. Dr. SHULGIN stated that he has no records to account for the 2CB he has manufactured, used or disposed of. A sample was taken for analysis.

Dr. SHULGIN voluntarily supplied Investigator (VF) with a copy of what he called a drug patent titled, "Information concerning the invention of a new antidepressant" (see attachment #5). According to SHULGIN, this document discusses the use of Schedule I methcathinone to create a methcathinone analog for use as an antidepressant. See page 7, "Human Pharmacology" where recent human trials in four individuals are discussed. The individuals reportedly have experience in testing MDMA. California Research Panel Authority executive (b)(7)(C) stated that Alexander SHULGIN nor his associate Dr.

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REPORT OF INVESTIGATION (Continuation)	1. FILE NO. (b)(7)(E) 3. FILE TITLE (b)(7)(C)	2. G-DEP IDENTIFIER
4. Page 4 of 6	-1	
5. PROGRAM CODE	6. DATE PREPARED November 3, 1	094
b)(7)(C) have the authority to conduct human d that this patent information has been submitted to Neurobiological Technologies Inc., 1440 Regatta EJ D)(7)(C)	(b)(7)(C)	Patent Attorney,
(b)(7)(C);(b)(7)(F)		
1 Dr. SHULCIN has not obtained IND's fd	r his drug resear	rch.
Exhibit #5 - MNDA -2 Schedule I MDMA - 20.7grams		
Dr. SHULGIN stated that he made 10 grans of this i records to document its manufacture. SHULGIN stat 2 and stated that it has a mild hallucinogenic eff	tem for NIDA 10-1 ed that he has pe	ersonally ingested MMDA
Exhibit #6 - MDA - Schedule I - Three glass vials	marked MDA Tartra	ite
D1. SHULGIN had no record of manufacture on these surrendered these items because he said he had no manufactured and analyzed these items to look at i	use for them. He	thought he
Exhibit #7 - HDMA - Schedule I - 1 vial containing	liquid	
Dr. SHULGIN had no record of receipt or manufactur refrigerator and voluntarily surrendered it.	e on this item fo	ound in his lab
Exhibit #8 - MDA - Schedule I		
one vial marked MDA - Dr. SHULGIN had no records o	n it	
Exhibit #9 - unknown white pouder in vial		
Dr. SHULGIN thought it might be MDA		
The information above indicates that Alexander SHU not authorized by his analytical lab registration failed to maintain controlled substance manufactur violaton of 21 USC 342(a)(5).	in violation of 2	1 CFK 1301.22(b)(3) and
Chain of Custody:		
DEA Form – 6a ^{(b)(7)(C)} (May 1980) – 6a ^{(b)(7)(C)} DRUG ENFORCEMENT ADMINISTR This report is the property of the Drug Enforcement Neither it nor its contents may be disseminated outside the Previous edition may be used	ent Administration. he Agency to which loaned.	

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	REPORT OF INVESTIGATION	1. FILE NO. (b)(7)(E)	2. G-DEP IDENT FIER
	(Continuation)	3. FILE TITLE (b)(7)(C)	
l.	Page 5 of 6		
5. PROG	RAM CODE	6. DATE PREPARED November 3,	1994

All exhibits noted above were sampled and/or voluntarily surrendered by Dr. SHULGIN, see attached DEA-12, Receipt for Cash or Other Items (attachment #6). Clan Lab Task Force Agent (b)(7)(C):(b)(7)(F) took custody of exhibits 1 through 9, transported them to the SFFD and processed them as drug evidence as witnessed by S/A (b)(7)(C):(b)(7)(F) The exhibits were mailed to DEA Special Testing Research Laboratory 7704 Old Springhouse Road, McClean, VA for analysis on October 28, 1994, (see attached DEA-7 s, attachment #7).

8. At approximately 1:00p.m., $D/I_{7XF}^{(b)(7)(C);(b)(7)}$ STRL Chemist D(7)(C) and S/A D(7)(C);(b)(7)(F)exited SHULGIN's laboratory and walked to the kitchen area of Dr. SHULGIN's house to continue the interview. STRL Chemist D(7)(C) queried Dr. SHULGIN regarding his statements involving his associations with DEA WRI Chemist D(7)(C). See attached report by D(7)(C), regarding this conversation and his laboratory interview of SHULGIN (attachment #8). Also attached to this report is a typed statement supplied by Dr. SHULCIN's D(7)(C) regarding their relationship with D(7)(C), D(7)(C) and prior DEA visits (attachment #9).

(b)(7)(C)

10. The Investigators also inspected Dr. SHULGIN's Basement #4 where he has an infra-red spectrometer. This room is located at the rear of the house. Scattered around this room were numerous controlled and non-controlled substances that Dr. SHULGIN said he receives in the mail. Dr. SHULGIN stated he receives approximately ten samples a month from friends, associates and anonymous individuals he has communicated with over the INTERNET Computer Network. Dr. SHULGIN identified some of the vials and stated that they contained 2CB Nexus from South Africa, Germany and the East Coast of the United States. Dr. SHULGIN refused to identify the individuals who sent the 2CB. Dr. SHULGIN did not have records for any of the items in Basement #4. Investigator $\frac{(b(7)(C)(b))}{(D(F))}$ asked Dr. SHULGIN to gather all suspected controlled substances in the room and document what he thought each one was. Dr. SHULGIN stated that he would document all suspect controlled substances in the room and surrender them to the DEA because he had no use for them. Dr. SHULGIN stated that he discontinued keeping records on samples nailed to him approximately two years ago. Dr. SHULGIN surrendered these items to the DEA on 10/31/94 (see DEA ROI, same file number and title as this report, dated 11/10/94). The suspected controlled substances were sent to DEA STRL for analysis.

<pre>11. Upon exiting E (b)(7)(C);(b)(7)(F) noticed, in</pre>)r. SHULCIN's residence Contra plain view, six potted peyote	Costa County Sheriffs' Officer (b)(7)(C);(b)(7)(F) e plants on Dr. SHULGIN's patio.
	(b)(7)(C)	The peyote plants were seized by TFA
DEA Form - 6a (b)(7)((May 1980) - 6a (c)	DEA SENSITIVE DRUG ENFORCEMENT ADMINI	STRATION

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REPORT OF INVESTIGATION	1. FILE NO. (b)(7)(E)	2. G-DEP IDENTIFIER (b)(7)(E)
(Continuation)	3. FILE TITLE (b)(7)(C)	
Page 6 of 6		
PROGRAM CODE	6. DATE PREPARED November 3,	
(see DEA RO1 Case # (b)(7)(E) (See DEA RO1 Case # (b)(7)(E), (ULCIN was not arrested pending analysis by tached photos of plants, attachment #10). At approximately 2:30p.m. the Inspection ontinued and terminated on October 31, 1994.	the Contra Costa Cou	
TTACHMENTS: Warrant for Inspection, dated October 26, Affidavit for Administrative Inspection W. Ops Plan Methcathinone Log Book Entry Shulgin Patent Info DEA-12, Exhibits 1-9 DEA-7's, Exhibits 1-9 DEA Chemist (D)(7)(C) Report (D)(7)(C) Peyote Photos		r 26, 1994
NDEXING SECTION: NULGIN. Alexander - NADDIS: (b)(7)(E)		

DEA Form - 6a (b)(7)(C) (May 1980) - 6a

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1

Drug Enforcement Administration

REPORT OF INVEST	Page 1 of 8				
. PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE NO. (b)(7)(E)	4. G-DEP IDENTIFIER	
5. BY: (b)(7)(C):(b)(7)(F) AT: Investigator San Francisco, CA		(b)	6. FILE TITLE (7)(C):(b)(7)(E)		
7. Closed Requested Action Completed	Ī		8. DATE PREPARED September 30,	1994	
9. OTHER OFFICERS: S/A's (b)(7)(C);(b)(7	')(F)				

10. REPORT RE: Administrative Inspection Warrant of Alexander SHULGIN, Analytical Laboratory DEA Number (b)(7)(E) (RA40)

SYNOPSIS:

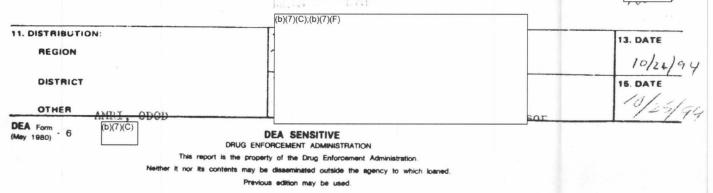
On September 27, 1994, the DEA SFFD served a DEA Administrative Inspection Warrant on DEA Registrant Dr. Alexander SHULGIN's residence where he maintains a DEA Analytical Lab registration, drug schedules I-V, and a chemical laboratory. The inspection revealed that Dr. SHULGIN was conducting unauthorized Schedule 1 research. Dr. SHULGIN left for Spain on September 28, 1994.

DETAILS:

1. Reference is made to the attached copy of Warrant for Inspection (attachment #1) and Affidavit for Administration Inspection Warrant (attachment #2) in the matter of the Administrative Inspection Warrant of:

Alexander T. SHULGIN Analytical Lab, Drug Schedules I-V DEA Registration (b)(7)(E) 1483 Shulgin Road Lafayette, CA 94549 (Dr. SHULGIN'S residence)

2. On September 27, 1994 at approximately 1:15pm, $D/I_{(F)}^{(b)(7)(C);(b)(7)}S/A_{(D)(7)(C);(b)(7)(F)}$ and $S/A_{(D)(7)(C);(b)(7)(F)}$ identified themselves to Dr. SHULGIN. Dr. SHULGIN invited the Investigators into his kitchen. $D/I_{(7)(F)}^{(b)(7)(C);(b)}$ handed Dr. SHULGIN a copy of the Administrative Inspection Warrant noted in section one of this report. $D/I_{(7)(F)}^{(b)(7)(C);(b)()}$ explained to Dr. SHULGIN the purpose of the inspection. Dr. SHULGIN stated that he would assist the Investigators and further advised that he and his wife and were leaving for Spain the following day, 09/28/94. During this discussion, Dr. SHULGIN introduced his wife^{(D)(7)(C)}



Drug Enforcement Administration

	REPORT OF INVESTIGATION	1. FILE NO. (b)(7)(E)	2. G-DEP IDENTIFIER
7	(Continuation)	3. FILE TITLE (b)(7)(C)	,
	Page 2 of 8		
5. PROGRAM CODE		6. DATE PREPARED September 30	, 1994

3. Dr. SHULGIN's Laboratory:

 $D/1^{D/(7)(C),(D)}$ asked Dr. SHULGIN to take the Investigators to his laboratory. Dr. SHULGIN led the Investigators to a concrete building located behind his house measuring approximately 15 x 30 feet, three windows on the side of the structure, with a wooden door with windows. The Investigators experienced a strong chemical odor upon approaching the lab. When the Investigators entered the laboratory they were exposed to a strong chemical odor. There was no ventilation in the lab. The room contained two work tables that were cluttered with chemicals and equipment. The walks and floor of the laboratory were also cluttered with chemical containers, some of which appeared to be corroding with age. (See attached photographs, attachment #3).

Investigator (7)(F) asked Dr. SHULGIN if he would identify and weigh controlled substances that he had on hand in the laboratory. Dr. SHULGIN weighed the following controlled substances:

Controlled Substance	Schedule	Quantity
2С-В	I	3.42 grams
Methcathinone	I	.9 grams

D/1(7)(F) asked Dr. SHULGIN what he was doing with the controlled substances, Dr. SHULGIN stated that "I make tools for medicine" and stated the following regarding his research.

2C-B aka "Nexus" - Schedule I

Dr. SHULGIN stated that his research with 2C-B involved it's use, "To Treat, mental illness" and as, "A tool to open up the subconscious to be used in therapy." Dr. SHULGIN stated that he wants to determine the effectiveness of 2C-B on receptor sites of rats.

Methcathinone - Schedule I

Dr. SHULGIN stated that he was using methcathinone and ephedrine in an effort to duplicate Schedule I MDMA action without the neurotixic effects. Dr. SHULGIN stated that he was working on this experiment and others including those with 2CB with (D)(7)(C)

(b)(7)(C) , (b)(7)(C) , (b)(7)(C) . Dr. SHULGIN stated that he and (b)(7)(C) work in SHULGIN's lab on Sunday evenings and that on Mondays, Dr. SHULGIN and (b)(7)(C) do research together at the S.F. General Hospital, Department of Toxicology and Experimental Pharmacology, UCSF, (b)(7)(C) . Dr. SHULGIN stated that both he and (b)(7)(C) transport controlled substances to and from his lab and the lab at S.F. General Hospital without documentation. Dr. SHULGIN also stated that he sends and receives controlled substance samples to and from other researchers including :

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Drug Enforcement Administration

REPORT OF INVESTIGATION (Continuation)	1. FILE NO. 2. G-DEP IDENTIFIER (b)(7)(E) 3. FILE TITLE (b)(7)(C) 0.00000000000000000000000000000000000
4. Page 3 of 8	
5. PROGRAM CODE	6. DATE PREPARED September 30, 1994
West Lafayette, IN DEA (b)(7)(E) exp. NADDIS: (b)(7)(C) (b)(7)(C) Purdue University Ph West Lafayette, IN (b)(7)(C);(b)(7)(E) Neurobiological technologi 1440 Regatta Blvd. Richmond, CA 94804 (CSA, (b)(7)(C) Phone (^{D)(7)(C)} (CSA, (b)(7)(E) Phone (^{D)(7)(C)} (CSA, (b)(7)(C) (CSA, (b)(7)(C)) are cond	armacy Bldg. nd Pharmacology nal and Chemical Pharmacology 47907 10/31/95 armacy, Bldg. 410B es, Inc. (NTI) NADDIS: [5706 [50706],(D)] asked Dr. SHULGIN if he had ethcathinone. Dr. SHULGIN stated that he CB and that he and [50/7)(C) maintain hey research. Dr. SHULGIN stated that expected to patent and was concerned IN stated that the Investigators could n ledgers were not reviewed by the controlled substances or analogues in the ledgers contained controlled

Ephedrine Reduction:

Investigator $\frac{(b)(7)(C)(b)}{(7)(F)}$ observed a glass container on Dr. SHULGIN's laboratory table marked Ephedrine and Penick. Inside the container was a chunk of chrystal. Dr. SHULGIN stated that he was researching a faster reduction method for methamphetamine using Ephedrine, Trichloric Acid, Hydrogen and Platinum Chloride. See lab photo, clear glass container, black top, front of white label (see attachment #4).

DEA Form - 6a (b)(7)(C)

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Drug Enforcement Administration

	REPORT OF INVESTIGATION	1. FILE NO. (b)(7)(E)	2. G-DEP IDENTIFIER
4.	(Continuation)	3. FILE TITLE (b)(7)(C)	
	Page 4 of 8		
5. PROGRAM CODE		6. DATE PREPARED	
		September 30), 1994

Analogs:

Dr. SHULGIN stated that his laboratory was loaded with Schedule I analogs and stated that the analogs were not regulated because they are not intended for human use. It should be noted that controlled substance analogs are regulated as controlled substances by California State Law H&S 11401.

4. Schedule I Research Authority:

It should be noted that Dr. SHULGIN had his Schedule I Research authority revoked by the State of California Research Advisory Panel in 1977 for conducting unauthorized research and illegal distribution of mescaline. See attached letter from the California Research Advisory Panel advising Dr. SHULGIN of the revocation, (attachment #5). Based on the State action, the DEA revoked Dr. SHULGIN's Schedule I Researcher Authority. See DEA Revocation letter to Dr. SHULGIN (attachment #6).

5. Waste Material:

(b)(7)(C);(b)(7)(F

S/A asked Dr. SHULGIN what he did with his waste material. Dr. SHULGIN stated that he poured waste material down a hole in the ground. Dr. SHULGIN led $S/A^{(b)(7)(C),(b)(7)(F)}$ to a hole in the ground located approximately fifteen feet from the door of the laboratory. Dr. SHULGIN identified the hole as an "old sump hole". Dr. SHULGIN stated that he took his nuclear waste to the Lawrence Lab in Berkeley.

6. Magic Stockroom:

After exiting the laboratory, Dr. SHULGIN showed the DEA Investigators a storage shed he described as his "Magic Stockroom", located next to Dr. SHULGIN's laboratory. The "Magic Stockroom" is an aluminum shed measuring approximately 15 x 20 feet. Dr. SHULGIN stated that this was where he has stored his chemicals over the years and that the shed also contains chemicals he has accepted from other laboratories who do not have the authority to destroy certain chemicals. Investigator $\frac{[by/7)(C)(b)}{7/(E)}$ entered the shed and noted numerous cans and bottles of chemicals including Acetone. Dr. SHULGIN stated there was cyclohexaline, methanol and inorganics in the shed. Dr. SHULGIN stated that the shed was probably full of precursor and essential chemicals. There was also a box of bottled Acetone located outside the shed. Dr. SHULGIN stated that the only controlled substance in the stockroom was Schedule IV chloral hydrate. Dr. SHULGIN showed Investigator $\frac{[b)(7/(C),(b))}{7/(E)}$ a one pound glass container marked chloral hydrate. The container was full. Dr. SHULGIN stated that the chloral hydrate was old and that he did not have records documenting its receipt. It should be noted that a strong chemical odor emanates from both the laboratory and the "Magic Stockroom". The door to the stockroom appeared to be made of aluminum equipped with a dead bolt lock.

DEA Form - 6a (b)(7)(C) (May 1980) - 6a

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Drug Enforcement Administration

	REPORT OF INVESTIGATION	1. FILE NO. (b)(7)(E)	2. G-DEP IDENTIFIER	
	(Continuation)	3. FILE TITLE		
-	(community	(b)(7)(C)		
4.	Page 5 of 8			
5. PROGRAM CODE		6. DATE PREPARED September 30, 1994		

7. Reference Samples:

After inspecting Dr. SHULGIN's laboratory and magic stockroom, Dr. SHULGIN led the Investigators to his kitchen located in his house where Dr. SHULGIN produced his reference samples. The reference samples, approximately 200, were in test tubes in two green "Cargille" cardboard boxes that Dr. SHULGIN stores in his library/computer room. Dr. SHULGIN produced a two page list of what he believed was in the two boxes (attachment #7). Dr. SHULGIN stated that the boxes contained controlled and non-controlled items most of which he manufactured himself. The reference standards are documented on the sheets as sedatives, stimulants, miscellaneous, chain homologs, OCH Position, Isomers, Cyclic Ethers, Chain Ethers/Ring Homologs. There were no quantities listed. Dr. SHULGIN had no receipt or manufacturing records for Tany of the controlled substance standards. Some of the controlled substances listed were: "illicit PCP", Doriden, Amphetamine Sulfate, Ritalin HCL, Methamphetamine, Phenmetrazine HCL, Fhendimetrazine Tartrate, Acetal Mescaline, Hydrocodone bitratrate, Psilocybin, STF, LSD.

8. Receipt Records:

Investigator (b)(7)(C):(b)) asked Dr. SHULGIN if he had received any controlled substances in the last two years. Dr. SHULGIN went into a room down the hallway and returned with what he described as an order/receipt ledger where he documents: "Purchase order number, date, company name, initials, date received, drug or chemical name, strength/quantity and price (attachment #8). There were significant gaps between invoice numbers listed. Jammed into this log book were controlled and non-controlled invoices. The following controlled substance order and/or receipt was listed as the cnly controlled substance ordered in the last two years.

Supplier	Drug/Quantity/Schedu	ule	Order Date	Date Received
Sigma Chemical Company 3050 Spruce Street St. Louis, MO	2 (Methylamino) Propiophenone HCL 1	I	04/10/94	Unknown
DEA # Not Documented	A-Ethyltryptamine Acetate 25gr.	I		

For the order noted above, Dr. SHULGIN produced a supplier's copy, DEA Form 222c for the order, the supplier's DEA Registration Number section, number of packages shipped and date shipped sections were blank (attachment #9). Dr. SHULGIN could not provide the customer copy for the purchase. Dr. SHULGIN produced a Sigma Chemical invoice for the purchase. This invoice did not indicate date received. Dr. SHULGIN did have both items noted above on hand in his library/computer room. Dr. SHULGIN stated that he did not recall ordering any other controlled substances in the last two years and that he makes most of his controlled substances.

DEA Form (May 1980)	-	6a	(b)(7)(C)	DEA SENSITIVE
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Drug Enforcement Administration

	REPORT OF INVESTIGATION	1. FILE NO. (b)(7)(E)	2. G-DEP IDENTIFIER
	(Continuation)	3. FILE TITLE (b)(7)(C)	
•.	Page 7 of 8	·	
5. PROGRAM CODE		6. DATE PREPARED September 3	0, 1994

Adjacent to the library/computer room is a room Dr. SHULGIN described as "Basement #4." This room appeared to be a storage room that contained various machines that Dr. SHULGIN described as diagnostic equipment. In the center of the room was a table on which there was a balance scale and what Dr. SHULGIN described as an infra-red spectrophotometer. Scattered around this area were items that Dr. SHULGIN described as samples that are given to him by friends or are mailed in from friends, associates and anonymous individuals for analysis. Dr. SHULGIN stated that some of the items he receives are controlled substances

(b)(7)(C),(b)(7)(F) ome are not. Investigator _______asked Dr. SHULGIN if he had any records documenting es he received. Dr. SHULGIN stated that at one time he maintained a log book documenting samples he received for analysis but that he stopped the documentation a few years ago. Investigator (b)(7)(C),(b) seized two items from basement #4, a letter with a pill attached and baggie containing powder with the word Oscarick written on it. Dr. SHULGIN stated he had no idea what the items on the table were except for 4 clear glass vials with black tops marked either "Nexus" or "Nexus Mother Liquor" that contained either powder or liquid (see photo attachment #12). Dr. SHULGIN identified these items as Schedule I "Nexus" (2CB) and the mother liquor of (2CB). Dr. SHULGIN stated that he synthesized the

2CB chemicals but he did not have any documentation of their manufacture.

12. Dr. SHULGIN stated that he was late for meeting some friends for dinner. The Investigators gave Dr. SHULGIN a receipt for items taken during the inspection (see attachment #13) and advised Dr. SHULGIN that DEA may resume their Inspection Warrant upon his return. The Investigators exited the residence at approximately 5:30 p.m. Investigator $\frac{|b|(7)(C),(b)|}{\Gamma(E)}$ returned to the DEA SFFD and placed the seized items in the DEA SFFD overnight safe for safekeeping.

ATTACHMENTS:

- 1. Warrant for Inspection
- 2. Affidavit for Administrative Inspection Warrant
- 3. Lab Photos
- 4. Lab Photo, possible Methamphetamine Chrystal
- 5. CRAP Revocation Letter
- 6. DEA Revocation Letter
- 7. Reference Standard Log Sheet
- 8. Order Receipt Ledger
- 9. DEA-222c, Suppliers Copy
- 10. Cocaine Invoice
- 11. Photo of Items Seized From on Top of Cabinet
- 12. Photo of "Nexus" 2CB Vials
- 13. DEA-12, Receipt for Cash or Other Items

INDEXING SECTION:

DEA	Form		6.	(b)(7)(C)
(May	1980)	-	04	

DEA SENSITIVE DRUG ENFORCEMENT ADMINISTRATION

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Page 8 of 8 PROGRAM CODE SHULGIN, Alexander - NADDIS: (b)(7)(E) (b)(7)(C):(b)(7)(E)	(b)(7)(C) 6. DATE PREPARED September 30	. 1994
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1. PROGRAM CODE	2. CROSS RE	LATED FILES	3. FILE NO. (b)(7)(E)	4. G.DEP II	DENTIFIER
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O. REPORT RE: Meeting with AUSA	Re: Che	mist Alexande	r SHULGIN (PM40)		
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On August 23, 1994, Invest	igator (0)		gave AUSA ^(b)	(1)(0)		ft copy o
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fayette, CA 94549, where he						
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BY/RCIENT/R) B Ar: Investigator San Francisco, CA B Disconsequence by: July 20, 1994 OTHER OFFICERS: July 20, 1994 Decomposition Requested Action Completed Disconsequence by: July 20, 1994 OTHER OFFICERS: July 20, 1994 Dates Requested Action Completed Disconsequence by: July 20, 1994 TAILS: Interconsequence by: NetPORTAE: Dr. SHULGIN, Schedule I Research "PIHKAL" (CH50) TAILS: Interconsequence by: Dick: ShULGIN's book "PIRKAL" (see dictached copy of list). In his book, d"PIHKAL", by: Dr. SHULGIN gover benets with humans. Dr. SHULGIN does not have the bord in section 1 of this report and determine is the drugs listed were controlled stances. On July 15, 1994, @W/RO: DEA/ODE fased a list of controlled substances ied In Dr. SHULGIN's phenethylamine list noted in section 1. Of July 15, 1994, @W/RO: DEA/ODE fased a list of controlled substances ied rugs noted below as controlled substances. e following are controlled in the CSA under hallwcinogens: #18 #20 4BR 3,5-DNA #20 #20 #20 4BR 2,5-DNA #23 -2,4-DNA #24 #20 4BR 2,5-DNA #25 -2,5-DNA #26 #20 4BR 2,5-DNA #25 -2,5-DNA #26 <th>PROGRAM CODE</th> <th>2. CROSS FILE</th> <th>RELATED FILES</th> <th>3. FILE NO. (b)(7)(E)</th> <th></th>	PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE NO. (b)(7)(E)	
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10. REPORT RE: Dr. SHULGIN, "High Times" Article (PM40)

DETAILS:

1. Reference is made to the attached article titled "Psychedelic" in the August 1994 issue of "High Times" magazine, documenting a High Times interview with Dr. Alexander SHULGIN and ^{(b)(7)(C)} regarding their personal use and experimentation with Hallucinogens. Dr. SHULGIN discusses his use of NDMA with "our patients". Neither Dr. Alexander SHULGIN nor ^{(b)(7)(C)} have ever had a license or the authority to distribute drugs or conduct therapy with patients. ^{(b)(7)(C)}

(b)(7)(C) In the SHULGIN's book PIHKAL: A Chemical Love Story, the SHULGINS discuss drug experimentation with Hallucinogens with their "Research Group" that consists of unnamed doctors and chemists. The High Times article also states that, "Their research continues to this day and a new book, TIKAL (Tryptamines: I have known and loved) is on the way." Tryptamines are LSD related compounds. Dr. SHULGIN is not registered with the DEA to conduct controlled substance research.

2. Dr. SHULGIN is registered with the DEA as an Analytical Lab schedules I-V. Dr. SHULGIN had his DEA Schedule I Researcher Registration revoked in 1977 based on the California Research Advisory Panel's revocation of Dr. SHULGIN's Schedule I research license to experiment with marijuana. The State's action was based on his failure to obtain approval for non-marijuana schedule I research and supplying of a schedule I substance to a non-registered individual without an order form.

ATTACHMENTS:

1. High Times Article, August 1994 issue INDEXING SECTION: SHULGIN, Alexander - NADDIS: (b)(7)(E) b)(7)(C);(b)(7)(E) (b)(7)(C);(b)(7)(F) 11. DISTRIBUTION: 13. DATE REGION OT DISTRICT 15 04 OTHER DEA Form - 6 MIKL. DDD upervisor (b)(7)(C) DEA SENSITIVE (May 1980) DRUG ENFORCEMENT ADMINISTRATION report is the property of the Drug Enforcement Administration may be disseminated outside the agency to which loaned Previous edition may be used

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10. REPORT RE: Dr. SHULGIN'S "Yes" Response to Item 5b on DEA-225 Renewal Application (PM40)

SYNOPSIS:

On March 11, 1994, Investigator (b)(7)(C);(b)(7)(F) contacted ODR to request a copy of Dr. SHULGIN's most recent DEA Renewal Application. (b)(7)(C) , ODR, located Dr. SHULGIN's Renewal Application and advised that he answered "yes" to question 5b. Ms. (b)(7)(C) stated that the renewal was not sent to the field for investigation because Dr. SHULGIN did not indicate that he had a prior DEA registration revoked or that he had his schedule I research privileges suspended by the California Research Advisory Panel.

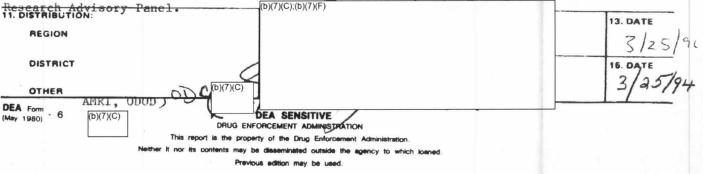
1. Reference is made to a copy of Dr. SHULGIN'S Renewal Application (DEA 255) for Registration as an Analytical Lab, Schedules I-V, dated January 8, 1994. Dr. SHULGIN answered "yes" to question 5b on his rehewal application.

5b - Has the applicant ever been convicted of a crime in connection with controlled substances under State or Federal law, or ever surrendered or had a federal controlled substance registration revoked, suspended, restricted or denied, or ever had a state professional license or controlled substance registration revoked, suspended, denied, restricted or placed on probation?

Dr. SHULGIN responded in writing on the reverse of his renewal application (DEA 225) as follows:

"Concerning the "yes" response to item 5b, the CSA Registration^{(b)(7)(E)}, issued for research in the area of scheduled drugs, was abandoned in 1977. The projects that had been underway were completed and no new application to the research advisory board was made. If such projects are to be instituted in the future will be made to the DEA for re-licensing.

Dr. SHULGIN makes no reference to the revocation of his researcher registration by the DEA or the suspension of his schedule I marijuana research privileges by the California



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Page 2 of 5			
. PHOGHAM CODE	6. DATE PREPARED March 15, 19	94	
2. Reference is made to the attached copy of co Acting Chief Counsel, DEA to Dr. SHULGIN, Re: Or Registration (b)(7)(E), dated June 9, 1977. Th	der to Show Cause	(Revocation DEA	
Dear Dr. Shulgin:			
On April 12, 1977, the Administrator of the to you an Order to Show Cause proposing to Controlled Substance Act for reasons set fo	revoke your regist	Administration directed ration under the	
The Drug Enforcement Administration has rec response to the Order to Show Cause. Since issues raised in the Order to Show Cause, y as a waiver of hearing pursuant to Title 21 1301.54(c).	you did not reque our written respon	st a hearing on the se has been considered	
The Administrator has considered your posit and has concluded that your registration as in Schedule I should be revoked.			
Therefore, pursuant to Sections 303 and 304 U.S.C. 823 and 824, respectively), the Admi Administration has ordered that your regist immediately.	nistrator of the D		
Correspondence regarding this matter should the Chief Counsel, Drug Enforcement Adminis Washington, D.C. 20537.			
Very truly y	ours,		
Acting Chief	Counsel, DEA		
(b)(7)(C);(b)(investigator ⁷)(F) is searching DEA records to l nis DEA Order to Show Cause.	ocate Dr. SHULGIN'	s written response to	
• Reference is made to DEA ROI Case (b)(7)(E) HULGIN'S DEA Schedule I Researcher Registration HULGIN'S schedule I researcher projects by the 6 he CRAP letter notifying Dr. SHULGIN that his Suspended, reads as follow:	based on withdraw. California Research	h Advisory Panel (CRAP).	
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Dear Doctor Shulgin:

Reference is made to your amended research protocol, dated December 7, 1976, which was submitted in response to the Panel's letter of November 23, 1976. The Panel has reviewed the material you have submitted and is unable to approve your protocol because of its major deficiencies.

Moreover, in view of violation of the controlled substances act and failure to obtain Panel approval for recently completed non-marijuana Schedule I drug research, the Research Advisory Panel hereby withdraws its approval of your marijuana project -"The Origin and Potencies of Marijuana," which was authorized in March 1970. Thus, it should be noted that henceforth you do not have authorization to conduct research with any Schedule I controlled substances in the State of California. The Drug Enforcement Administration is being apprised of this action by a carbon copy of this letter. The detailed findings of the Panel's review are presented below.

Supplying of a Schedule I controlled substance to a non-registered individual and without an official order form.

It has come to the Panel's attention that you supplied mescaline for a research project at the University of California at San Diego. This Schedule 1 substance was supplied to non-registered individuals and without an official federal order form. You are well aware of the State and Federal statutes and regulations, including the need for prior Research Advisory Panel approval of research protocols involving mescaline and other hallucinogenic drugs. This deliberate violation of the law (c.f. Hadorn, D. et al, <u>Behavioral Biology 17</u>; 403-9, 1976, footnote #1) leaves the Panel with serious questions about the propriety of your handling of drugs with abuse potential.

Conduct of Schedule I drug research (other than marijuana) without Panel approval.

Along with your brief amended research application for marijuana, you submitted an extensive bibliography. Some of the recent publications (e.g., Pharmacology 10; 12-18, 1973; Neuropharmacology 14; 165-74, 1975) report research work with Schedule I hallucinogenic substances that has never been submitted to the Panel, nor approved by this body as required by State law. Your published activities document violation of State laws regarding controlled substance research.

A further aspect of this violation is the unauthorized use of human subjects for research with a investigational new drug. Since this matter is primarily the concern of the Federal Food and Drug Administration, a copy of this letter is being forwarded to FDA for follow-up and appropriate action.

DEA Form - 6a (b)(7)(C) (May 1980) - 6a

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Failure to submit an annual report for 1976.

In its letter of November 23, 1976 the Panel requested that you submit an annual progress report of your research project. Annual reports, as in the past, were due by December 31st. No report was received from you by, nor since, the deadline. This report is still required, but rather than a progress report it should be a comprehensive final project report. Pursuant to Section 11480 of the California Health and Safety Code the nature of research projects and their conclusions are to be reported to the State legislature.

Deficiencies in amended protocol

The deficiencies in the amended research protocol are referred to be section number.

2.b The purpose of the experiment is unnecessarily vague with regard to "several of the organic chemicals which are present in the intact plant." You must specify which substances you are interested in studying. Moreover, the scientific merit of this proposed investigation is not clear from your protocol. What is the value of such a study?

2.c In the protocol you indicate that you are uncertain whether tetrahydrocannabinol or cannabinol will be needed, and that you have these substances on hand anyway. It is required that the amounts of these substances that are on hand be reported.

Marijuana will be planted, grown and harvested as part of this experiment. You have not provided estimates of yield of psychoactive or potentially psychoactive substances. The protocol is vague as to how much marijuana will be grown. You have not disclosed the source of the seeds. Also required is your current inventory of seeds, growing plants, harvestef plant parts, and extracted resin material.

2.d It is required that your capabilities for characterization of the tetrahydrocannabinols and their sulfur analogs be described. This information is applicable.

2.e The description of the facilities is cursory and inadequate. A floor plan of the chemical laboratory is required and a full description of the equipment therein contained (if not included in 2.d above). Where will the marijuana plants be grown?

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	Page 5 of 5					
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2.f It is not sufficient to state that the storage facilities for the controlled substances are DEA approved. The storage arrangements must be described. Regarding the inventory of controlled substances, the precise information recorded in your laboratory notebook, including documentation of use, must be described in the protocol.

Summary

It is the Panel's policy that anyone can apply to the State to conduct specific research projects with Schedule I controlled substances and, moreover, that applicants who have had their approvals withdrawn can reapply. In addition to following the requirements and procedures of the Panel, should you wish to resubmit an application, it would be required that you submit a protocol for all of your research with Schedule I drugs, and that you provide a suitable explanation for the publicly disclosed violations cited above.

It is required that all Schedule I concrolled substances held for research purposes be turned over to the Drug Enforcement Administration at this time for disposition. If you intend to reapply to the Panel, your supplies of Schedule I controlled substances may be held until final action is taken on your reapplication, or until June 30, 1977, whichever comes first.

	Chairman	
	(b)(7)(C)	
	Executive Secretary	
ATTACHMENTS :		
1. Copy of Renewal Application 2. DEA Revocation Letter		
3. California Research Advisory Pa	anel Letter	
INDEXING SECTION:		
1. SHULGIN, Alexander - NADDIS (^{(b)(7)})(E)	
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4. Reference is made to Dr. SHULGIN's book PIHKAL (Phenethylamines I have Known and Loved) copyright 1991 throughout his book, Dr. SHULGIN acknowledges his illicit use of Heroin, Cocaine, Marijuana, Mescaline and over 170 Hallucinogenics. Dr. SHULGIN also states that he has distributed Hallucinogenic drugs to (b)(7)(C)

(b)(7)(C) and numerous psychiatrists and chemists. Dr. SHULGIN also states that he has a vast inventory of controlled substances that he has collected over the years. Dr. SHULGIN cites his illegal use and human research of Hallucinogenics through the mid 80's. Dr. SHULGIN also provides detailed recipes for 178 Hallucinogenics in his book and documents his reaction to them. Dr. SHULGIN is not authorized to conduct research by the DEA. He had his DEA Researcher Registration revoled in 1977.

5. Under his DEA Analytical Lab Registration Number (b)(7)(E), Schedules I-V, Dr. SHULGIN is required to maintain the following records:

21 CFR 1304.27 - Records for chemical analysis

(a)(2) The forms or forms in which the controlled substance is received, imported or manufactured by the registrant and the concentration of the form.

(a)(3) The total number of forms manufactured and the name address and registration number if any of the person from who the controlled substance was received.

(a)(4) The quantity distributed, exported or destroyed in any manner by the registrant (except quantities used in chemical analysis or other laboratory work), including the date and manner of distribution, exportation or destruction, and the name, address and registration number of each person to whom the substance was distributed or exported.

5. On March 7, 1994, Dr. SHULGIN was a guest speaker on "Live 105" Radio Talk Show. Dr. SHULGIN was introduced as the "Godfather of MDMA" and advised on the use of MDMA.

6. Dr. SHULGIN is also reportedly writing a book titled TIHKAL (Triptomines I have known and Loved). Triptomines are LSD related compounds. This indicates that SHULGIN may also be conducting illegal Triptomine Research on Humans.

INDEXING SECTION:		
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		483 Shulgin Road	
		afayette, CA 94549	
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Alexande	r SHULGIN's (b)(7)(C)		
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N	ame: SHULCIN, Alexander T. (NADDIS:	(D)(7)(E)	
	1483 Shulgin Rd. Lafayette, CA 94549		
	Larayette, GA 94349		
0	ccupation: Researcher Chemist		
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	February 15	, 1994			

DEA records indicate that SHULGIN has illegally used and administered schedule I drugs and has allegedly trained clandestine lab operators. In a recent Texas drug case, SHULGIN and a clandestine drug chemist were photographed together in SHULGIN's lab. Alexander T. SHULGIN is registered with the DEA to handle controlled substances as follows:

SHULGIN, Alexander T. 1483 Shulgin Road Lafayette, CA 94549 3, 3N, 4, Analytical Lab, Schedules 1, Expires 02/28/94, Approved 1971

Alexander T. SHULGIN had his DEA Researcher schedule I registration $e^{[07](E)}$ revoked in 1977 based on the withdrawal of the approval of SHULGIN's schedule I research projects by the California Research Advisory Panel (CRAP). The Research Advisory Panel found that SHULGIN supplied Mescaline for a research project at the University of California at San Diego to an individual who was not registered with the DEA and without using an Offical DEA Order Form (Case (D)(7)(E)). CRAP also found that SHULGIN conducted unauthorized use of human subjects for research with a new investigational drug. (See attched CRAP letters citing violations, attachment #2).

4. Reference is made to correspondence from (b)(7)(C) , Acting Chief Counsel, DEA, to Alexander T. SHULGIN, PhD., RE: Order to Show Cause (Revocation) DEA Registration (b)(7)(E) dated June 9, 1977. This letter advises Dr. SHULGIN that DEA received his written response to DEA's Order to Show Cause in Lieu of a Hearing and that the DEA Administrator has considered Dr. SHULGIN's response and concluded that Dr. SHULGIN's registration as a researcher in schedule I should be revoked effective immediately. (See attached DEA letter, attachment #3).

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6. On April 22, 1992, Investigators Shulgin Road, Lafayette, California. Wife. The investigators presented their creder (DEA-82) to Dr. SHULGIN. Dr. SHULGIN was infor inspection and asked to read the Notice of Insp SHULGIN authorized the inspection by virtue of 1). Investigators (^{b)(7)(C)(b)(7)(F)} signed a	tigators met wit tials and a DEA med of his right ection. After r hia signature on	s regarding the eading the form, Dr.
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U.S. Department of Justice

DEA Form

Drug Enforcement Administration

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4. Page 3 of 4		1483 Shulgin Road Lafayette, CA		
5. PROGRAM CODE		6. DATE PREPARED April 24, 1992		

Dr. SHULGIN stated
that when the 600 controlled substances arrived he offered the
consulting/analysis to Dr. (b)(7)(C) The actual analysis was performed at Dr.
SHULGIN's laboratory under his supervision. When the analysis was completed
the remaining controlled substances were shipped back to the DEA laboratory
via certified mail, return receipt requested. Dr. SHULGIN provided to the
investigators a copy of a letter dated March 26, 1992 to (b)(7)(C) , Senior
Forensic Chemist at the DEA Western Laboratory. The letter documents the
analysis being completed by Dr. $(b)(7)(C)$ and the return of the unused LSD tabs
(attachment 2).

10. While on-site, the investigators were shown the doctor's library/office. This room in the main house is the location for the storage of any controlled substances received by the doctor for analysis. The investigators were informed that the material is usually stored in a locked filing cabinet. however the investigators witnessed evidence pertaining to case number (b)(7)(C) (b)(7)(C) laying on the floor of the office. Dr. SHULGIN stated that the evidence was recently received and he had been reviewing the material. The investigators reminded the doctor that the material is required to be stored in a locked cabinet when not being analyzed.

11. The investigators were then shown the doctor's "clean" laboratory located in the house. This laboratory is used for storage of his gas chromatography equipment and other analytical equipment. The actual laboratory is located in a small concrete building outside behind the doctor's residence. The laboratory is small but well equipped. The investigators were also shown a building beyond the laboratory which is used for storage of chemicals.

12. Investigator (b)(7)(C);(b)(7)(F) inquired if the doctor receives any telephone calls requesting information on the manufacture of illicit drugs. Dr. SHULGIN stated that any person calling requesting information is told to look up the information in available publications.

13. The investigators also asked if the doctor ever supplies any reference samples to other chemists. Dr. SHULGIN stated that on occasion he will forward small quantities of controlled substances to other chemists, but only after receiving a DEA-222 for the material. Dr. SHULGIN then asked what copy of the DEA-222 should be sent to DEA and where. Investigator (b)(7)(C):(b)(7)(F) stated that the green copy of the form should be mailed to the San Francisco Field

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14. The investigators concluded the meetin residence.	ng and departed Dr. S	HULGIN's		
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16. Based on the above, no action is deeme informational purposes only.	d necessary. This r	eport is for		
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from the Bulletin of the Multidisciplinary Association for Psychedelic Studies MAPS - Volume 10 Number 2 Summer 2000 - p. 11

An Amateur Qualitative Study of 48 2C-T-7 Subjective Bioassays

Casey Hardison

This is an amateur qualitative study of 2C-T-7, a fairly novel entheogenic compound that has been used in a limited context as an adjunct in psychedelic psychotherapy since 1986.[1]



It was chance that at a rare international gathering of pharmacophiles and entheogen aficionados, in a relaxed tropical conference setting, I noticed a number of individuals subjectively bioassayed 2C-T-7. I recognized this as an opportunity to further the understanding of 2C-T-7 through anecdotal experiential accounts and to lend credibility to the scientific methodology of the subjective [2] bioassay. Transforming insight into action, I prepared and administered a written survey. What follows is a summary of the experiences noted by 48 individuals who willingly did ingest 2C-T-7.

Understanding

The subjective bioassay is probably the oldest of all scientific techniques and is no different than smelling or tasting something to determine if it is spoiled. In regards to putative entheogenic and/or therapeutic compounds, the subjective bioassay involves the consumption of a compound and then the notation of the effects experienced subjectively by an individual. The use of the subjective bioassay is probably most notably demonstrated by Dr. Arthur Heffter's pioneering 1897 systematic pharmacological study of mescaline the active alkaloid of the peyote cactus Lophophora williamsii.[3]

Created by Dr. Alexander Shulgin, 2C-T-7 is properly known as 2,5-Dimethoxy-4-(n)-propylthiophenethylamine. [4] 2C-T-7 is a phenethylamine compound like mescaline and MDMA. On the common nomenclature of 2C-T-7, Dr. Shulgin states:

I made up the 2-carbon name for a lot of these compounds because they were the 2-carbon homologues of several amphetamines that I had already made and had found to be active. Compounds such as DOM, DOET, DOB, DOI, Aleph-2 and Aleph-7, for example, all have the amphetamine skeleton and thus show a 3-carbon chain. They are the 3carbon prototypes, so when I made a number of new compounds without the alpha-methyl group, they were properly phenethylamines containing a 2-carbon chain. And I named them that way, accompanied with a leading letter or element from the 3-carbon code name. Thus these became 2C-D, 2C-E, 2C-B, 2C-I, 2C-T-2 and 2C-T-7. The "T"

Page 335

was a reminder that there was a thio-group (a sulfur atom) in the molecule [vide supra Note 1].

Many of these compounds have been found to be useful and as adjuncts in psychotherapy, especially MDMA, 2C-B, 2C-E, 2C-T-2 and 2C-T-7. [5] It is an opinion of many involved with psychedelic psychotherapy that a therapist has "no business" conducting psychotherapy with a psychoactive compound that has not been subjectively bioassayed by the therapist.

On questioning Dr. Shulgin about the use of these compounds as follow-ups to MDMA in psychotherapy, Dr. Shulgin replied:

The compound that has been most frequently used that way has been 2C-B. The argument used here is that the action of MDMA is to bring about an opening of some of the emotional barriers of the patient, then with that aspect of the mental state being acknowledged the action of the short term acting psychedelic allows something to be done with it. So it is not really a booster, but really a second and separate session that usually ties quite comfortably with the first session. It is as if the first (the MDMA) shows where the wound is, and the second (the 2C-B or 2C-T-7) allows the healing to start.

Dr. Shulgin further stated that of most of his effective trials, "generally plusthrees were with doses of 20 to 25 milligrams" [6] [vide supra Note 1]. The participants of this study ingested between 25 to 45 mg of 2C-T-7.

Methods

Using my background in Biochemistry, Botany, and Medical Anthropology, I generated the survey intending that it be as generic as possible, yet still capture what I subjectively recognized to be essential information - mainly dosage, duration, and the generalized effects of 2C-T-7. The survey was distributed to individuals who would accept it and 48 responses were returned. No formal protocol was followed, as this was an impromptu study.

Survey Questions

Empirical questions included: Did you ingest 2C-T-7? How many other 2C-T-7 bioassays have you completed? Did you consume any other synergistic or antagonistic compounds during your 2C-T-7 bioassay? What quantity of 2C-T-7 did you ingest? Are you male or female? What is your body weight? What is your age? Subjective questions included: What were your dietary habits in the last 72 hours? What was your mindset before consumption of 2C-T-7? What was your mindset during your bioassay of 2C-T-7? What was your mindset after your 2C-T-7 bioassay, especially upon waking after sleep? How were your clarity of thought, movement and energy levels affected by ingestion of 2C-T-7? What length of time was required to begin noticing effects of the 2C-T-7? What was the duration of your peak experience? Was there anything missing that would have contributed and made a difference for you? Were there any awe-inspiring moments of primary importance and will you please share them?

Medical Anthropology takes account of the belief system or cosmology of the individual when determining therapeutic efficacy, [7] hence I attempted to obtain a greater understanding of the role that "mindset" plays in entheogenic experiences, especially in regards to the therapeutic potential of 2C-T-7.

Results

Forty-eight individuals, 13 female and 29 males and four who did not specify gender, ages 24 to 73, from various cultural paradigms, did willingly ingest 2C-T-7. The mean age of males was 44 years and of females 42 years. Thirty-three individuals reported having no previous experience with 2C-T-7. Twelve individuals reported having completed one to 15 previous bioassays. [8] The dose of 2C-T-7 consumed ranged from 25 mg to 45 mg in males and 25 mg to 33mg in females with dosages ranging from 0.3mg/kg to 0.6mg/kg.

The length of time required for participants to begin noticing the effects of 2C-T-7 ranged from 15 minutes to four hours with most people reporting from one to two hours. The number of hours after ingestion of 2C-T-7 that peak effects were noted ranged from one to six hours with most reporting between two to four hours. The duration of peak experiences ranged from one to five hours with most reporting between two to four hours. Four people noted that they did not understand the use of the word "peak." Several volunteered the total duration of their bioassay, which ranged from 8 to 18 hours with a median around 12 hours.

Other compounds, antagonistic or synergistic, consumed by 16 participants during their experience, included: Marijuana (11), 90 mg Dihydrocodeine and Valium (2), Beer (1), cocaine (1), flower essences (1).

Set before ingesting 2C-T-7

The responses to questions about state of mind before ingesting 2C-T-7 included such statements as: OK, normal, baseline, centered, fine, up, good, positive, happy, heartful, open, clear, receptive, relaxed, willing, interested, curious, stimulated, attentive, connected, eager, anxious, anticipation, apprehension, concerned, nervous, scattered, tired, varied, confused, down, muddy. Notable exceptions were: "Rife with anticipation." "Minimal haunting by my usual demons." "Eager to try but anxiety about dosage." "Concerned about effects of 'speed' content due to my heart condition."

Set during the experience

The participants noted similar declarations in response to questions about mindset during their 2C-T-7 bioassay. Some notable exceptions were: "Extraordinarily free roaming, very lucid and philosophic." "Complete and utter bliss, incredible, cosmic, and extremely grateful." "General sense of

well being, I had many insights, catharsis early on." "Some emotional periods, feeling sad and disoriented." "Became emotional, got in touch with a sorrow in my heart which led me to a place of love."

Participants reporting of the effects of 2C-T-7 on clarity of thought, movement, and energy levels stated: "Clarity of thought somewhere between MDMA and LSD." "At 3-hour mark I had to interact with straight people and negotiate a business exchange, no problem as long as I focused my concentration." "Some difficulties in focusing my thoughts, clear but disoriented." "I moved in an easy coordinated manner while hiking and climbing." "Clarity uncaged, crystalline thoughts, movements like an animal, confident and energetic."

The most often reported physical disturbance was general nausea/upset stomach (7), other exceptions noted include: Headaches (4) including one mention of a migraine lasting into the next morning; Muscle tension (3); Extreme nausea (3); Abdominal Cramping (1); Tachycardia (1); Adrenal Pain (1). When asked, "was there anything missing that would have contributed and made a difference for your experiences," most responded "no," however a few participants made statements exemplified by: "It was perfect, I couldn't find anything wrong." "Something to help with queasiness." "Something was missing but I don't know what it was." "Lack of physical discomfort." "Perhaps, more?"

Therapeutic effect reported

Six participants declared therapeutic or healing effects and made these statements: "Very healing." "Gently wept a few times, good medicine." "Very gentle and therapeutic." "I reviewed and processed emotional issues." "Instantaneous awareness of programming." "Some deep emotional issues were addressed and resolved within myself."

Thirty-five participants, 26 males and nine females, stated that they would conduct 2C-T-7 subjective bioassays again. Seven said they would not and four did not respond.

Interpretation

I failed to ask the chronological question, "How many hours total did you notice the effects of the 2C-T-7? I thought the specific subjective question that would be most useful was, "Would you conduct research with 2C-T-7 again? If not, Why?" I realize now that the use of the word "research" instead of "bioassay" created a listening in the subjects that some did not understand or was incoherent with the intentions of their experience. Not one of the individuals who ingested or bioassayed 2C-T-7 knew they would later be asked to contribute to scientific research, subsequently becoming participants.

All of the reported experiences embodied both cognitive and physical subjectivity and individuality. The subjective responses of the participants

illustrate beautifully the Sapir-Whorf hypothesis, which holds that speakers of a particular language must necessarily interpret the world through the unique vocabulary and grammar their language supplies. On this Sapir stated, "No two languages are ever sufficiently similar to be considered as representing the same social reality. The worlds in which different societies live are distinct worlds, not merely the same world with different labels attached. We see and hear and otherwise experience very largely as we do because the language habits of our community predispose certain choices of interpretation." [9]

This was an international gathering with people from distinct societies with distinct language habits. When Gordon Wasson noticed the many distinctions for mushrooms that his Russian wife knew compared to the three available in his own English language, he asserted that these language distinctions represented a clue as to how religions are founded. So, taking this one step further; it is in semiotics or language that entities relate with one another, whether that language is electro-chemical charge or complex symbolic constructs. Cognition, the process of intuitive reasoning, exists in language, where all of human realities exist, and is thus the recognition of semiotic pattern. In other words, "It is all interpretation, and I don't even know that."

Not one person reported the same experience as another. This is the true blessing of the subjective bioassay. The subjective bioassay tells us that we must always take into account the differences in physiology and rates of molecular metabolism as well as rates of recognition of semiotic pattern. Indeed, we are all unique and one of a kind.

Suggestions for further research

Arthur Kleinman has argued that therapeutic efficacy boils down to a declaration either made by the sufferer or the healer that is listened by the sufferer with credibility or faith. Therefore, a controlled qualitative study examining the ability of an individual's mindset or linguistic programming to create and cause the psychedelic experience would shed light on the nature of consciousness and its relationship in the therapeutic process.

Acknowledgments

This would not have been possible without: The loving support of Kevin "K-Dog" Lovinghawk and his parents; MAPS and the Entheogensia: I am grateful for who you are and for your efforts, it is making the difference; My parents' genes and inspiration; A grant from TTN.

Notes and References

1 Shulgin, A.T, Personal communication April 2000, see also note 5. 2 Subjective has many definitions, which denotes the subjective explanations of the word subjective. This extends well to the assay of a chemical in that a subjective bioassay is unique to each individual organism's biochemistry and perspective of stimuli. 3 http://www.heffter.org/Arthur.html last checked May 6, 2000.

4 Shulgin & Shulgin (1991, 1998). PiHKAL: A Chemical Love Story. Berkeley, CA: Transform Press.

5 Stolaroff, M.J. (1994). Thanatos to Eros; 35 years of Psychedelic Exploration, Berlin: GAM-Media GmBH.

6 For an explanation of the 'plus' rating of subjective bioassay experiences see PiHKAL p. xxiv. in Note 4.

7 Csordas, T.J. & Kleinman A. (1996). The Therapeutic Process. In: Medical Anthropology: Contemporary theory and method, Rev. Ed. C.F. Sargent and T.M. Johnson (eds.). Connecticut: Praeger Publishers.

8 Five participants each reported one previous bioassay, two reported two previous bioassays, two reported three previous bioassays, and three reported six, seven and 15 previous bioassays respectively.

9 Sapir, E. (1929). "The Status of Linguistics as a Science" In E. Sapir (1958, p. 69), Culture, Language and Personality (ed. D. G. Mandelbaum).
Berkeley, CA: University of California Press.

Next article



Alexander Shulgin and 2C-T-7 (and PIHKAL, TIHKAL and the DEA)

Pubdate: Wed, 01 May 2002 Source: East Bay Express (CA) Author: Kara Platoni Copyright: 2002 New Times

US: 2C-T-7's Bad Trip



Sasha Shulgin invented 2C-T-7. Then he published the recipe.

It was only a matter of time before his drug turned up on the tongues of non-scientists.

In the beginning, Alexander Shulgin created 2C-T-7, and it was good. Shulgin has dedicated his life to the idea that psychedelics can be used to explore the potential of the human mind, and of all the many drugs he has sampled, 2C-T-7 was one of his personal favorites. "If all the phenethylamines were to be ranked as to their acceptability and intrinsic richness, 2C-T-7 would be right up there near the top," he wrote of his 1986 invention.

It was a glowing statement from the man believed to have consumed a wider variety of drugs than anyone else on the planet. In his fifty-plus years as a chemist, the genial, wild-haired Shulgin, who is better known to his friends and admirers as "Sasha," has become a renegade scientific folk hero responsible for bringing more than two hundred new drugs into the world.

Timothy Leary once called Shulgin and his wife Ann "the two most important scientists of the twentieth century." Throughout Shulgin's career, which has included stints as a UC Berkeley instructor and expert witness at Drug Enforcement Agency (DEA) trials, Shulgin's work has been marked by his special love for psychedelics. Nowadays he often refers to them by the terms "phenethylamines" or "tryptamines," concerned as he is by the connotations of hippie excess attached to the word "psychedelic."

Shulgin does not design drugs for the commercial market.

His inventions exist primarily on paper and in controlled laboratory quantities. Also known as "research drugs," they have never undergone widespread testing and often have been sampled only by Shulgin and Ann, his partner in chemical exploration. While it is legal for Shulgin to invent them in the lab, it's not legal for any of his inventions to be manufactured, sold, or consumed as so-called "analogues" designed to mimic the effects of illegal narcotics. But despite the stringency of the laws that govern such drugs, 2C-T-7 was not destined to stay confined to the Shulgins' Lafayette lab forever.

In 1991, the couple published the first in a series of 800-page books that included directions for synthesizing a total of more than 200 chemical compounds, including 2C-T-7. PIHKAL: A Chemical Love Story (the acronym stands for Phenethylamines I Have Known and Loved) was a unique book by any standard, weaving together lab procedure, highly personalized accounts of each compound's creation, and Sasha and Ann's own love story, as told in the alternating voices of two not-quitefictional characters named Shura and Alice Borodin. It was followed in 1997 by TIHKAL: The Continuation (the "T" is for Tryptamines). Alternately hailed as invaluable contributions to the scientific world or derided as cookbooks for amateur pharmacologists searching for a novel high, the massive tomes found a ready audience among establishment and underground chemists.

PIHKAL, now in its fifth printing, has sold about 35,000 copies, TIHKAL about 12,000. Recipes and commentary from both books are posted all over the Internet.

It was only a matter of time until the compounds Shulgin described in his books began turning up on the tongues of people not tasting them in the name of science.

The path by which 2C-T-7 went from research to recreational drug is not terribly difficult to divine.

In 1999 it made its first commercial appearance in Holland's drug-dealing smart shops in both tablet and powder form. It was given the street name "Blue Mystic," perhaps in order to differentiate it from its chemical cousin, another Shulgin creation named 2C-T-2. By 2000, 2C-T-7 had acquired limited popularity in the United States, along with the street names "beautiful," "7-Up," and "tripstasy."

The drug acquired a reputation for its mescaline-like properties, which were said to produce an intense yet clearheaded trip with flowing visual effects. But the "trip reports" posted on drug-related Web sites such as The Vaults of Erowid

(<u>http://www.erowid.org/</u>) and The Lycaeum (<u>http://www.lycaeum.org/</u>) also told a more complicated story.

While many users praised the drug's powerful visual effects and the strong feelings of well-being it produced,

04/02/2004

others urged caution, complaining that 2C-T-7 was extremely painful to inhale when taken nasally, and that it could cause a host of unpleasant side effects including nausea, vomiting, muscle tension, body tremors, panic attacks, and violent episodes.

Because individual responses varied so widely, users suggested the drug was highly dose-sensitive and that a bad trip could be triggered by mismeasurement, a too-generous dose, or 2C-T-7's interaction with other drugs. Titles of these Web site trip reports show the complete range of experience: from "Extremely Euphoric" and "Shiny Things Are Fun" to "Aliens Reprogrammed My Brain" and "2C-T-7 and MDMA, A Dangerous Combo."

By October 2000, wary drug users had another reason to pass on 2C-T-7: a twenty-year-old casualty from Norman, Oklahoma named Jake Duroy. According to an announcement posted on Erowid, Duroy died after taking thirty-five milligrams of the drug. Duroy snorted the drug, which multiplies its effect well beyond that of the ten-to thirty-milligram oral dose that Shulgin had suggested in PIHKAL would be sufficient for most people.

Duroy's death was both frightening and violent; about an hour after taking the drug, he became extremely agitated, and began yelling about evil spirits.

A half-hour later he was convulsing, vomiting, and bleeding heavily from his nose; the coroner later found a large edema in his lung.

Two more deaths were soon linked to 2C-T-7. In April 2001, the staff at Erowid posted the news that an acquaintance of theirs, a 24-year-old Web designer from Seattle, died after swallowing an unknown quantity of 2C-T-7 in conjunction with 200 milligrams of Ecstasy. Although his name wasn't released to the media, the report seems reliable because of his personal connection to the Erowid staff. In the same month, Joshua Robbins, a seventeen-year-old from Cordova, Tennessee died after snorting between thirty and thirty-five milligrams of 2C-T-7, not long after taking several other stimulant drugs.

According to Rolling Stone, which ran an article on Robbins' death, in the twelve hours before he died Robbins also had consumed Ecstasy, nitrous oxide, and a "mini-thin" containing ephedrine and guaifenisen. His final hours were agonizing: Robbins' friends recall that he vomited heavily, became panicky and violent, and spent the last few moments of his life yelling, "This is stupid! I don't want to die!"

Media coverage has misrepresented 2C-T-7 as a quasi-legal toxic trend that is sweeping the nation.

But 2C-T-7 has never really shown signs of becoming a sweeping drug phenomenon. For starters, it's not particularly easy to make. Its use also seems to have been geographically scattered; it never appeared with any great prevalence in the Bay Area. Members of an Oakland-based group called SHARE Project, a group that does health education work at raves, report that they've scarcely seen it. "It's not a big concern here," says media liaison Le Liu. By the beginning of 2001, even many of Holland's smart shops voluntarily agreed to stop selling Blue Mystic, the same year that at least two online suppliers stopped selling the chemical.

In fact, 2C-T-7 may well have been on the downswing of its popularity last January when Rolling Stone published the article on Robbins, touting it on the cover as "The New (Legal) Killer Drug." It was an unfortunate headline choice -- especially for a publication that very likely gave 2C-T-7 its first mass-media exposure -- since the drug is certainly not, as the magazine claims, "perfectly legal."

Some observers worry whether the

recent media attention paid to 2C-T-7 will produce an upsurge of morbid interest from the sort of users who can read about a gory death and still want to sample the powder that caused it. "It just goes along with the attraction of it being illegal and dangerous," Liu says. Several Web sites even have featured debates over whether 2C-T-7 itself cost the young men their lives, or whether their deaths were caused by taking too much of too many drugs too fast.

In any case, it is an ironic and flamboyant fate for a chemical whose inventor's own approach to drug exploration is so profoundly different from that of the rave culture that is making his creation famous.

The media has occasionally portrayed Sasha Shulgin as a drug-guzzling mad scientist, but it is hard to see him as a nefarious figure, although he certainly has an iconoclastic bent and mischievous wit. Now in his seventies, Shulgin is bearded, bespectacled, and sandal-clad. Both Shulgins sport leonine masses of hair, although Sasha's is more to the silver and Ann's more to the gold. A rather charming passage in PIHKAL has Shulgin theorizing that he unconsciously willed his hair completely white by age thirty in order to enhance his appearance as a "harmless old professor" which, as he put it, "can be useful at times when you do the kind of work I do." Ann, reclining in an easy chair with a cigarette in hand, is the handbrake to his runaway train, gently rebuking her husband when he embarks upon conversational detours liable to confuse visitors without a PhD in chemistry.

And there are many visitors.

Their hillside Lafayette home, fondly referred to as the Farm, is something of a tourist destination for pharmacophiles. Although the Farm displays little differentiation between lab and living space, the most popular exhibit is a tiny backyard lab where the inventor keeps the classical music cranked up to eleven.

The lab is filled with glassware, and a discarded nuclear-magnetic-resonance console lies in the backyard grass like the carcass of some sci-fi dinosaur.

Guests are advised to protect their watches from the powerful magnets in one lab, and not to breathe too deeply when trooping through the storage shed, which houses thousands of brown glass bottles of powders and liquids, the combined odor of which lies somewhere between fruit punch and vulcanized rubber with several less pleasant stops in between.

The Shulgins keep a strip of yellow police line tape pinned up on the diningroom wall, perhaps as a souvenir of the unwanted attention Sasha's work has received.

Berkeley native Sasha Shulgin's fascination with the relationship between mind and chemical matter began, oddly enough, in the Navy during World War II. A severe infection on his left thumb required surgery.

Before he went under the knife, he was handed a glass of orange juice, at the bottom of which he noticed some undissolved white crystals.

Convinced it was a sedative, Shulgin drank the juice but resolved to stay alert.

He promptly blacked out. Upon waking, he was surprised to discover that the knockout drug had been nothing more than sugar; his mind had tricked itself over the simplest of placebos.

Shulgin resolved right then to devote his career to the relationship between drugs and the human mind.

After leaving the Navy, he returned to UC Berkeley to study biochemistry. Reading the works of Aldous Huxley and Henri Michaux, he became intrigued with mescaline, which he tasted for the first time in 1960. "It was a day that will remain blazingly vivid in my memory, and one which unquestionably confirmed the entire direction of my life," he wrote in PIHKAL. "The world amazed me, in that I saw it as I had when I was a child.

I had forgotten the beauty and the magic and the knowingness of it and me. ... The most compelling insight of that day was that this awesome recall had been brought about by a fraction of a gram of a white solid."

After receiving his doctorate from Cal, Shulgin worked for a decade as a senior research chemist at Dow Chemical, where he was given a good deal of research freedom after inventing a profitable insecticide. It was during this period that Shulgin began a lifelong policy of taste-testing all his work. He began by testing a mescaline analogue called TMA, expecting a repeat of his previous experience. Instead, he was unpleasantly surprised to discover that the TMA produced only feelings of rage. He describes one trip during which he found himself in Tilden Park angrily hurling rocks and sticks. It was a pivotal moment in his development as a researcher; a chemical structurally similar to mescaline had produced the opposite effect. His subsequent work would focus on this very phenomenon, rearranging the atoms of known active substances to produce isomers that might yield different effects.

In 1966, Shulgin left Dow to attend medical school at UC San Francisco. But he only stayed for two years; it turned out he was more interested in learning how the body and brain worked than learning how to repair them. So he set up a home lab and hung out his shingle as a consultant, beginning his curiously interdependent relationship with the DEA. Despite Shulgin's persistent interest in sampling drugs and the agency's persistent interest in stopping people from doing so, the two parties developed a surprisingly close relationship. Shulgin wrote a handbook on the Controlled Substances Act that became a standard desk reference for DEA employees, and he later would serve as an expert witness for both the prosecution and defense in DEA drug trials.

In return, the DEA granted Shulgin a license to handle certain illegal drugs, which was subject to a rigorous annual inspection. Shulgin also became a university instructor, teaching classes in forensic toxicology at UC Berkeley and San Francisco State University.

Sasha and Ann met in 1978 at a weekly discussion group in Berkeley. At the time, Ann was a divorced mother of four; Sasha's wife of thirty years, the mother of his son, had passed away the year before after a stroke.

Ann, who had tried peyote and been extremely moved by the experience, was eager to trip again and pelted the chemist with questions about his work. He soon invited her to the Farm to try MDMA, now better known as Ecstasy (a name they both dislike, since a good portion of what is marketed as Ecstasy is not truly MDMA).

Shulgin had begun experimenting with MDMA as early as 1967. Although MDMA is the drug that made him most famous, it is not his own invention.

The compound was created in 1912 by the German pharmaceutical company Merck, only to fall into obscurity.

Shulgin helped repopularize its use, claiming that it might have value as an antidepressant since it allowed people to look deep inside their own psyches without reservation. In Ann he found a willing partner in exploration. As a lay therapist, Ann joined the movement of psychologists and psychiatrists who claimed that MDMA was a powerful therapeutic tool that could, for example, help rape victims or war veterans open up to a therapist. Ann soon became a regular in the most unconventional part of Shulgin's research. Unlike university or pharmaceutical company scientists, Shulgin is his own prime test subject. But one does not survive swallowing untested drugs for more than forty years by luck alone. Shulgin developed a painstaking system. He swallowed only minute amounts of untried chemicals, letting 48 hours go by before boosting the dose, usually by a factor of two or less. He learned his own body's warning signs -- never let your thoughts thoughts fall into a rut; never stare too long into a mirror while on MDMA; watch out for anything that provokes jumpiness or sleepiness at a low dose. He developed a scoring system in which the effects of new materials were rated from "minus," or "no effect," up to "plus four," a "one-of-a-kind, mystical, or even religious experience." Once he concocted something promising, he would invite a half-dozen friends to spend a day sampling it with him. This, too, had rules. No one who was sick, on medication, or had taken any other drugs within the previous three days could partake. The group would bring food and sleeping gear for an overnight stay. The safety rules were strict: a hand signal meant the speaker was about to raise a real-life safety concern, each participant could veto group suggestions that might affect their experience, and people not in established relationships were discouraged from sexual behavior. The friends generally spent their time eating, walking in the garden, listening to classical music, and paging through picture books. Like Shulgin, they'd start with tiny amounts of a new drug and slowly boost their doses. Afterward, the participants were expected to share their impressions with Shulgin, who made it clear he was a researcher, not their personal candy-man.

If Shulgin's tasting weekends weren't lab protocol, they certainly weren't wild drug parties, either. "Use them with care, and use them with respect as to the transformations they can achieve, and you have an extraordinary research tool," Sasha Shulgin once said of phenethylamines. "Go banging about with a psychedelic drug for a Saturday night turn-on, and you can get into a really bad place psychologically."

Even as the Shulgins' collaboration deepened -- they were married by a DEA agent in 1981 -- the laws surrounding their work were changing rapidly, largely in response to the behavior of other drug enthusiasts whose experimentations were less scientific. In 1984, the federal government listed MDMA as a so-called Schedule I drug, barring it from future clinical testing as a substance with no medicinal value and a high potential for abuse. The loss to the Shulgins was enormous. They believed a powerful tool was taken from researchers because of the government's overreaction to MDMA's increasing prominence in nightclub culture. Why, they asked, were limitations on medical research being set by the DEA, a law enforcement agency?

The following year, the federal government went even further, passing the Controlled Substances Analogue Enforcement Act as a reaction to the proliferation of designer drugs such as heroin analogue China White. The Analogue Act criminalizes the sale or manufacture for sale of any chemical with a structure or action "substantially similar" to that of a Schedule I or II drug.

In a letter published in the Journal of Forensic Sciences, Shulgin complained that the law has a "carefully worded vagueness," which allows the government to arbitrarily decide which chemicals to okay and which to squelch. "By designing the net which has a completely variable mesh size, one can catch whatever fish one wishes to and let escape another fish that is not wanted," he wrote.

Regulators say the law is fairer than that. "I wouldn't say it casts a wide net," says one official from the DEA's

04/02/2004

Office of Diversion Control, who asked to remain anonymous. "It's a very narrowly crafted law that only affects substances that are not being studied for use as medicines for humans, but are being manufactured or distributed for human consumption outside of approved research, have been found on the street, and which are likely to meet the findings for control under our laws in the future."

In either case, the effect on Shulgin's research was obvious -- the group drug-tasting experiments had to stop. By this time, many of the scientific journals that once had welcomed Shulgin's work were turning away his papers, citing legal worries. Seeking another outlet, the Shulgins published PIHKAL and TIHKAL.

Even though PIHKAL begins with a warning that to synthesize any of its recipes for human consumption is to "risk legal action which might lead to the tragic ruination of a life," and even though more than half of the recipes were previously published in scientific journals, the authors could have faced legal action. They published anyway. Asked why, Shulgin tells the story of Wilhelm Reich, inventor of a "cloudbuster" that he claimed could make it rain, and the orgone box, a device he said could treat cancer. After the FDA charged Reich with fraud for selling an unlicensed medical device, he died in prison in 1957. The court ordered that all of his research be burned, and his life's work was lost. "I can see having maybe two or three people in the higher echelons of the government who may not like what I do, and I did not want particularly to have all of this be seizable and burnable," Shulgin says. "So I published it. Now you cannot get rid of it."

The Shulgins take a long view towards the role of psychedelics in human history. People have used psychoactive substances for thousands of years, they note, and it's unlikely that anyone will stop soon. "People all over the world are trying to fiddle around with chemical compounds and if you close one down, ten more spring up, because it's a fascinating pursuit," says Ann. "Publishing the recipes is an effort to minimize the harm that could come from somebody following the wrong instructions, or maybe no instructions at all, and ending up with a compound that kills him or poisons all his friends." Plus, she adds, the recipes in the books are written in scientific language targeted at experienced chemists. "The complaint that they could easily be made in anyone's bathtub is total nonsense," she says. "No way."

But after PIHKAL's publication, Shulgin's relationship with the DEA changed -although the agency never took any official action against the book itself. In 1994, the DEA raided the Shulgins' lab. In a chapter of TIHKAL simply called "Invasion," Ann's alter ego describes the raid. She remembers DEA agents and state narcotics officers -- some wearing helmeted biohazard suits -pulling up in a fleet of vehicles, including a firetruck and a decontamination truck. She also remembers the DEA agents shyly asking the chemist to autograph their copies of PIHKAL.

Ultimately, Shulgin was written up for a series of chemical storage violations that somehow never caught the attention of previous inspectors. At the DEA's urging, he surrendered his Schedule I drug handling license, paid a \$25,000 fine, and made some changes to his laboratory to comply with environmental regulations. Shulgin says the loss of his license doesn't affect his inventing at all -- after all, he doesn't need Schedule I drugs for his own research and is not interested in producing analogues of them. "If a chemical turns out to have an action of a Schedule I drug, I'll just publish the damn thing and go on to something else," he says.

But the investigation had a powerful psychological effect. "Never again will

Shura work with a sense of absolute freedom," Ann wrote in TIHKAL. "He's had a taste of that particular form of power-flexing peculiar to people who are employed by government agencies. The authorities intended to frighten him and perhaps they even hoped to silence him, but that is not and will not be possible. ... The magical laboratory still stands."

Law enforcement's get-tough reaction to what is clearly a significant American curiosity about psychedelic drugs unwittingly encourages people to sample research chemicals and other exotic compounds, drug-policy-reform advocates argue. "Drug laws are driving people to try drugs they ordinarily wouldn't because they can't get the tried and true, like mushrooms or LSD," writes one freelance drug researcher and Erowid contributor who goes by the screen-name "Murple."

Both sides of this debate agree, however, that once a research drug hits the street, it can mean trouble.

Research drugs' lack of prior testing and the legal misunderstandings surrounding them combine to create the worst of all possible scenarios -- a period of heightened interest in an untested substance during which dealers are quick to cash in on a new trend, emergency room technicians are unlikely to recognize the drug in the event of an overdose, and information about safe usage is scarce and anecdotal at best. Little is known about research drugs' side effects, interactions interactions with other drugs, and safe dosages because FDA clinical trials are not conducted on substances that hold no promise of patents and profits for university or pharmaceutical company researchers. So people commonly resort to what Julie Ruckel of the Drug Policy Alliance calls "dancefloor pharmacology," an informal network in which information passes from friend to friend. "It's all word-of-mouth," she says. "Someone took twenty milligrams and it was fine, so they'll tell the next

person."

Just about everyone involved in the 2C-T-7 debate agrees this is a dangerous practice. "A small difference in the dose can make a huge difference in the experience," says Liu of the SHARE Project. Other factors, including a person's weight, how much fluid is in their system, and what medications they are taking also can determine how a trip turns out. For its part, the DEA cautions that taking any non-FDA approved drug is a risky prospect. "You don't oftentimes know what the safety risks are, you don't know what the dose would be, what the administration should be," the DEA official says.

Certainly the government collects information on new street drugs, but the generation of partygoers who have been instructed since toddlerhood to "Just Say No" often just tune out government education efforts. "Who wants to be the wet blanket at a party?" sighs Kate Malliarakis, branch chief officer of demand reduction for the Office of National Drug Control Policy. "If you've got ten people standing there saying, 'Come on, mellow out, take a chill pill,' and you have a couple of old farts like myself standing there saying, 'This is going to do damage to you,' it's like an old cartoon. Who's going to believe me?"

Liu agrees that government drugawareness programs have overemphasized the negative effects of drug use, so teenagers have lost faith in them. "You don't want to withhold information from people, especially young people," he says. "If you tell them the whole truth, they're going to be more open to you telling them about the risks.

If you only tell them the bad things about drugs, they'll know you're not telling them the whole story. Kids are smart enough to know that you're telling them this information about this drug because people are using it. But they're going to think, 'Why are people using it?' Obviously there's some sort of benefit, so you must be lying."

In the absence of information perceived as reliable, curious drug enthusiasts now often get their information through two channels that owe a great deal to the expansion of the Internet -- online bulletin boards and the studies of amateur researchers. The popularity of Web sites such as Erowid and the Lycaeum shows the breadth of public interest in research drugs; the fact that amateurs have bothered to craft their own studies reveals the depth.

Erowid, for example, gets 20,000 page views a day. Both Erowid and the Lycaeum have adopted a tell-it-all philosophy toward both the positive and negative effects of drugs such as 2C-T-7. Their disclaimers don't mince words. "When you take a research chemical, you are stepping out into the unknown, and you could be the unfortunate person to discover a new drug's lethal dose," reads the "Research Chemical FAQ" Erowid site. In general, news posted on these sites is acknowledged to be so far ahead of the curve -- and so readily available -- that regulators are learning to check there first for information about new drug trends.

So far, you could count the number of scientific papers devoted to 2C-T-7 on one hand and still have a finger left over. In 1991, Shulgin published the first report on 2C-T-7 in the Journal of Psychoactive Drugs. Two years later, another study appeared in the Journal of Ethnomedicine , but it was extremely limited, consisting of only eight test subjects who each took a single dose. The only other studies out there have been conducted by nonscientists who disseminated their results online.

One of them, published in the Summer 2000 Bulletin of the Multidisciplinary Association for Psychedelic Studies by amateur researcher Casey Hardison, simply surveyed the experiences of 48 people who tried differing amounts of 2C-T-7 at a conference for what he calls "entheogen enthusiasts."

The following year, Erowid contributor Murple posted the results of a larger email survey of more than 400 people who had tried 2C-T-7 in a variety of dosage amounts, both by snorting and swallowing. The results of both studies reaffirmed what already had been posted on Erowid and Lycaeum trip reports.

In general, 2C-T-7 produced feelings of lucidity and euphoria, as well as the rare panic attack; neither study indicated a pattern that could show users when to expect which result.

The vast majority of those surveyed expressed interest in trying the drug again. Murple's much larger and more systematic survey also documented a high incidence of side effects, with about two-thirds of the users reporting nausea, about half reporting muscle tension, with one-third reporting vomiting and another third reporting headaches.

His report also included detailed chronicles of the three 2C-T-7-related deaths, as well as further anecdotes collected from around the world of seizures and blackouts apparently prompted by 2C-T-7.

The most interesting conclusion he drew from his research, Murple says, is that 2C-T-7 appears to be both erratic in its effect and highly dose-sensitive, much more so than other phenethylamines. Why is the difference between a good trip and a nasty one just a few milligrams of powder, he asks, and why are some people so floored by the drug and others barely feel it? While he believes the three connected deaths make 2C-T-7 a bad bet for clinical trials on people, Murple points out that 2C-T-7's apparent volatility makes it a worthy subject for mainstream medical researchers who could come to the table with better funding and equipment than any amateur could. "I think if we could figure out what makes 2C-T-7 so

unique, we'd learn something very valuable about the way the human brain works and about the way this whole class of drugs works," he writes. "There is something very unusual going on here, and we owe it to ourselves as a society to find out what."

But not everyone thinks the Internet is a safe place for curious pharmacophiles to be exchanging such research.

A recent National Drug Intelligence Center report sparked huge outrage by concluding that Web sites and bulletin boards that post information about the production or effects of illicit substances constitute a "threat" to American youth. "I have trouble with the Web sites because they talk about the here and now, but not the consequences," says Malliarakis. "They do talk about what a bad trip is all about, but not about what it's going to be like five years from now." Plus, she medical or therapeutic applications if given further study.

As an example, he mentions Aleph-4, a particularly unpleasant chemical that produced a totally emotion-free state. "You couldn't feel sorrow, you couldn't be angry, you couldn't be happy," he says. "You were a piece of cardboard.

"I'm creating tools to study the function of the mind -- not the brain, the mind. And here's a good example -- total lack of effect.

That is a rare but real clinical thing, and here's a drug that produces that state.

Can't you see the joy I would have by putting a radioactive tracer on it and sticking it into a person who had that medical problem and to another person who is a control who didn't have the medical problem and seeing this goes up here, but that goes over there?

"Ah!" he sighs, his voice dropping lower. "That would be marvelous!"

Another compelling example is a drug

called DIPT that is remarkable among psychedelics for its auditory, as well as visual, effects.

In fact, after tasting DIPT for the first time, Shulgin only noticed the onset of the drug because he happened to be listening to the kitchen radio, which suddenly sounded terribly out of tune. "I assumed it was probably some little group somewhere," he remembers. "It turned out to be the Philadelphia Symphony, which is very excellent. It was me who was out of tune!"

In TIHKAL, Shulgin had expressed great interest in learning how DIPT might affect the brain's auditory processing centers.

And years later, he is still wondering aloud if studying DIPT might have other benefits.

For example, could it cast some light on schizophrenia, which usually results in auditory, rather than visual, delusions?

Shulgin doesn't seem likely to stop inventing new compounds, either, and he says he's not looking for anything in particular. "I don't have a holy grail. I'd just like to find something new," he says. "If it's never been made before, of course it's never been tasted before.

And if the structure is similar -- not substantially similar, but similar -- to other things that are active, it's so damned intriguing to know if it's going to be active and what it will do. The motive is to satisfy the curiosity.

And once you've found the answer --'Oh hey, it's kind of neat,' or 'Oh my, I'm on the edge of convulsions,' or 'Oh my, I went to sleep' -- you've answered the question."

But the Shulgins' days of experimenting with 2C-T-7 and chemicals like it are behind them. After five decades of fascination with lab-made synthetics, Sasha Shulgin has turned his attention to botanicals, in specific a rather unexplored type of cactus alkaloid called isoquinolines. The hill behind the Farm is speckled with more than one hundred cactus plants, and the beakers in his lab are now lined with a sludgy olive-green residue. He's at work on the manuscript for a third book, one the couple jokingly refers to as QIHKAL.

"Most of the cacti out there are not known by anybody to do anything," says Ann, indicating the hillside slope. "It's all new," agrees Sasha Shulgin, who very excitedly pulls down one of the many notebooks from his laboratory shelf and opens it to a page in which he has pasted a jagged graph: a mass spectrometer printout of the chemical makeup of one species of cactus.

Each peak represents a compound in need of a name and analysis, a compound that might turn out to do something new and unusual and previously unobserved.

"And you don't know what it will do," Ann adds gently, in a tone that's half statement, half question.

"I'm going to find out as much as I can," says Sasha, smiling broadly. "That's my whole art."



HOME

Refs 2C-T-7 Professor X MDMA safety MDMA advert Designer Drugs Ecstasy in the USA Protect and Survive MDMA: controversies Ecstasy and the Brain Charles Grob on MDMA

http://mdma.net/alexander-shulgin/2c-t-7.html Page 360

04/02/2004

Alexander Shulgin and 2C-T-7 (and PIHKAL, TIHKAL and the DEA)

MDMA/ecstasy: review Alexander and Ann Shulgin Alexander Shulgin on MDMA Alexander Shulgin Interview Buying Research Chemicals Online 2C-T-7/Blue Mystic (from PIHKAL) Alexander Shulgin on Future Psychedelics

http://mdma.net/alexander-shulgin/2c-t-7.html

2C-T-7, Ask Dr. Shulgin Online June 28, 2001

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Top News

Home

About

Contact

Publications

Navigate

CENTER FOR COGNITIVE LIBERTY & I

Projects

Ask Dr. Shulgin Online

ARCHIVE: June 28, 2001

2C-T-7

Dear Dr. Shulgin:

I would like to learn about 2,5-dimethoxy-4-(n)-propylthiophenethylamine, known as 2C-T-7, including recommended dosage, predicted effects and duration of action.

--Haungar

Dear Haungar:

Addendum Sept. 2002: 2C-T-7 Scheduled.

There are two superb epidemiological studies of human trials with 2C-T-7 taken from surveys of users, and one excellent clinical study of it as a potential psychotherapy tool.

An article appeared in the MAPS Bulletin entitled, "An Amateur Qualitative Study of 48 2C-T-7 Subjective Bioassays," in Volume 10 #2 Summer issue of 2000, on page 11. It can be downloaded from the MAPS web site, where it is filed at http://www.maps.org/news-letters/v10n2/10211har.html. This was a survey conducted by Casey Hardison with users who attended an ethnopharmacologic workshop in Southern Mexico earlier that year.

Another review, a survey of users of both 2C-T-7 and the S-ethyl homologue 2C-T-2 was written by a person named Murple, and covered the 423 responses that he received from a request for information published by the drug web-site Erowid. This is entitled "2C-T-2 & 2C-T-7 User Surveys" and has been published at that site on February 6, 2001. The address is http://www.erowid.org/chemicals/2ct7/article1/survey.shtml for downloading.

The human clinical study was entitled "*Preliminary Results with New Psychoactive Agents 2C-T-2 and 2C-T-7*" and was published in the Jahrbuch f. Ethnomedizin, pp 99-117 (1993). It was authored by Myron J. Stolaroff and C.W. Wells, and it is in English.

-- Dr. Shulgin

Disclaimer: Manufacturing or possessing outlawed drugs is a crime that can result in a lengthy term of imprisonment and significant fines. The Alchemind



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REPORT OF INVESTIGATION (Continuation)	1. File No. (b)(7)(E) 3. File Title	2. G-ĐẾP Identifiér (b)(7)(E)
4. Page 3 of 19 5. Program Code (b)(7)(E)	(b)(7)(C) 6. Date Prepared 01/02/01	
C)	l	
*		
(7)(C)		nder Theodore
HULGIN was registered as a researcher	and analytical la	b with DEA until
/28/96 when his registration number wa	s retired, the ou	tcome of an Order
o Show Cause (OTSC). This OTSC was is	sued after an ins	pection warrant
onducted on his residence on 9/27/94 i as conducting unauthorized Schedule I	research Prior	to these actions
is Naddis record lists a number of all	egations regardin	q illicit
ctitivities. These allegations includ	le using unauthori	zed Schedule I
rugs and administering same to humans	illegally; possib	ly acting as a
onsultant to major clandestine lab ope	rators (allegatio	ns made circa
977); involvement in the production an	d distribution of	designer drugs
time period of allegation unk); using nformation and deliver drugs (allegati	ons made circa 19	941: and illegal
se of chemicals and drugs on humans (a	allegations made c	irca 1995).
(C)		
EA Form - 6a DEA SENS	ITIVE	
Jul. 1996) Drug Enforcement Ad	Iministration	

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Page 486

U.S. Department of Justice Drug Enforcement Administration

REPORT OF INVES	Page 1 of 1			
1. Program Code	2. Cross File	Related Files	3. File No. (b)(7)(E)	4. G-DEP Identifier (b)(7)(E)
5. By: (b)(7)(C);(b)(7)(F) SA At: PORTLAND, OR DO			6. File Title (b)(7)(C)	
7. Closed Requested Action Completed Action Requested By:			8. Date Prepared 05-25-2010	
9. Other Officers: None .				

DETAILS

o)(7)(C)			

2. To further clarify the sentence in paragraph 8 of said report "Phenethylamines are hallucinogenic chemicals" the following information, paraphrased from <u>PHIKAL</u> by SHULGIN, First edition, Seventh Printing, 2007, is provided. Phenethylamines are hallucinogenic chemicals (drugs) that are chemically synthesized from phenethylamine. The physiological action of phenethylamine is that of a stimulant. However, because it is rapidly metabolized it is too short lived to produce observable effects.

INDEXING

 SHULGIN, A	lexander		NADI	DIS (b)(7)(E)	
REMARKS:	Controlled	substance	analogue	chemist.	

11. Distribution: Division SEA	(b)(7)(C);(b)(7)(F)	-	13. Date 05-25- 2010
District Other			15. Date 5 26 10
DEA Form - 6 (Jul. 1996)	DEA SENSITIVE Drug Enforcement Administration		
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Drug Enforcement Administration

REPORT OF INVESTIGATION				
2. Cross File	Related Files	3. File No. (b)(7)(E) 6. File Title (b)(7)(C)	4. G-DEP Identifier (b)(7)(E)	
		8. Date Prepared 05 - 11 - 2010		
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SUMMARY

(b)(7)(C)	• •	

DETAILS

1. Reference is made to DEA-6 dated 04-27-2010, written by S/A (b)(7)(C).(b)(7)(F) under this file title and number titled: "Intelligence Regarding Animal Research Protocol in the United States."

2 (b)(7)(C)

- 3. Reference is made to the Controlled Substance Analogue Enforcement Act of 1986 (CSAEA) which is further detailed in 21 USC 802 (32)(A) (i)(ii)(iii) and 21 USC 813.
- 4. The investigative theory of this case asserts that human consumption is the expected outcome of the manufacturing, distribution, possession, and research and testing of controlled substance analogues such as those listed herein. The following review of literature predominately references human testing and experimentation. Inherently, the legal issues encountered by Alexander SHULGIN, detailed herein, exemplify the potential for further legal penalties for those who violate the

11. Distribution: Division SEATTLE FLD :	(b)(7)(C);(b)(7)(F)	13. Date 05-13- 2010
District Other		15. Date 5/14/10
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REPORT OF INVESTIGATION (Continuation)	1 File No. 2. (b)(7)(E) (b)(7) 3 File Title (b)(7)(C) (b)(7)	G-DEP Identifier (E)
4. Page 2 of 8		
5. Program Code	6. Date Prepared 05-11-2010	

Controlled Substance Act and/or the CSAEA, 21 USC 813, in that the intentional implicit ploy of purchasing controlled substance analogues under the representation of animal research is done with criminal intent.

5. S/A ^{[b)(7)(C),(b)(7)(F)} review of the book <u>PIHKAL-A Chemical Love Story</u>, authored by Alexander Shulgin, PhD. and ^{[b)(7)(C)}, Transform Press, Berkeley, CA, first edition (1991), 7th printing (2007), revealed that SHULGIN stopped using animals for new drug research. The reasoning for this action was detailed on pages xxii-xxvi. In summary, SHULGIN believed that in order to research and test, in an effort to predict, the psychological effects of psychedelic drugs, to include hallucinogenic substances and/or controlled substance analogues, and their respective dosage levels on animals was not a satisfactory predictor for the results in humans. SHULGIN's book TIHKAL predominantly references human testing, such as SHULGIN's personal self-research, of hallucinogenic (psychedelic) substances than testing or research involving animals.

(b)(7)(C)

7. S/A ^{(b)(7)(C),(b)(7)(F)} review of the book <u>PIHKAL</u> notes that in the "NOTE TO THE READER", page xi, the following excerpt is located:

"At the present time, restrictive laws are in force in the United States and it is very difficult for researchers to abide by the regulations which govern efforts to obtain legal approval to do work with these compounds in human beings. Consequently there has been almost no clinical research conducted in this area for almost thirty years. However, animal studies can be done by the approved and qualified scientist who finds sources of research funding and who appeals to and obtains his supplies of drugs from an appropriate government agency such as the National Institute on Drug Abuse."

8. S/A (b)(7)(C),(b)(7)(F) review of an affidavit dated 09-26-1994 by DEA Diversion Investigator (b)(7)(C),(b)(7)(F) , DÉA case number (b)(7)(E) which was in support of a DEA Administrative Inspection Warrant, Magistrate's docket #3.94 30514 OEW, filed in the Northern District of California, the affiant stated that: "In February, 1994, the Affiant reviewed the book <u>PIHKAL (Phenethylamines I Have Known and Loved)</u>, A Chemical Love Story,

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REPOR	T OF INVESTIGATION (Continuation)	1. File No. 2. G-DÉP Identifier (b)(7)(E) (b)(7)(E) 3. File Title (b)(7)(C)
4. Page 3 of 8		
5. Program Code		6. Date Prepared 05-11-2010
		ulgin and ^{(b)(7)(C)} cals. An excerpt of the book's rs one of the authors, Dr.
	Alexander Shulgin, affe as Sasha, has been the synthesize, then evalua and in a dedicated grou never-before known chem expected to have effect	ectionately known to his friend only person in the world to ate in himself, his wife Ann, up of close friends, nearly 200 mical structures, materials ts in man similar to those of medelic drugs, mescaline,
	psilocybin, and LSD" y describes the unauthoriz	zed manufacture, abuse and their analogues."
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DEA Form - 6a (Jul. 1996)

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4.			_
Page 8 of 8			
5. Program Code		6. Date Prepared 05-11-2010	
2. SHULGIN, REMARKS:	Alexander Controlled substance anal	NADDIS ^{(b)(7)(E)} ogue chemist.	
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	REPORT OF INVESTIGATION (Continuation)	1. File No. (b)(7)(E) 3. File Title (b)(7)(C)	(b)(7)(E)
age 3 of	6		
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1 A A			
/ TATT	ESTIGATORS NOTE: Alexander SH	ULCIN upp a cheminal	natanatan C.
DOW	Chemical and is credited with	synthesizing MDMA i	n 1976 SHULG
is c	urrently still active in research	arching mind alterin	g drugs
incl	uding LSD.)		
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(Jul. 1996)

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Page 622

	REPORT OF INVESTIGATION	1. File No. 2. G-DEP Identifier (b)(7)(E) (b)(7)(E)
	(Continuation)	3. File Title (b)(7)(C)
k.	Page 4 of 6	
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	Alexander SHULGIN (NADDIS # 1483 Shulgin Road	D)(7)(E)
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Page 627

U.S. Department of Justice

Drug Enforcement Administration

REPORT OF INVESTIGATION (Continuation)	1. File No. 2. G-DEP Identifie (b)(7)(E) (b)(7)(E) 3. File Title (b)(7)(C)
4. Page 7 of 11	
5. Program Code	6. Date Prepared 01-27-2011

[Analyst's Note: The DEA raided a laboratory belonging to Alexander SHULGIN (NADDIS (D)(7)(E) in 1994. The books, PiHKAL, A Chemical Love Story, and TiHKAL, The Continuation, are believed to be used as cookbooks on how to make illegal drugs. They also contain synthesis information for tryptamines.]

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REPORT OF INVESTIGATION (Continuation)	1. File No. (b)(7)(E) 3. File Title (b)(7)(C)	2. G-DEP Identifier (b)(7)(E)
4. Page 4 of 7		
5. Program Code	6. Date Prepared 02/19/09	

(ANALYST NOTE: A QUERY OF SHULGIN IN NADDIS RESULTED IN A POSTIVE HIT WITH NADDIS NUMBER^{(b)(7)(E)} (ALEXANDER THEODORE SHULGIN). SOME OF THE DOCUMENTED REMARKS NOTATE THE FOLLOWING: "USE OF INTERNET COMPUTER SYSTEM TO COMMUNICATE DRUG INFORMATION"...."HAS WEBSITE TO FACILITATE ILLEGAL DRUG MANUFACTURING"...."CREDITED WITH SYNTHESIZING MDMA"...."ACTIVE IN RESEARCHING MIND ALTERING DRUGS INCLUDING LSD"...."POSSIBLE CONSULTANT TO MAJOR CLANDESTINE LAB OPERATORS)

(b)(7)(C);(b)(7)(F)		
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REPORT OF INVESTIGATION		Page 1 of 13	
1. Program Code (b)(7)(E)	2. Cross Related Files File	3. File No. (b)(7)(E)	4. G-DEP Identifier
5. By: I / A (b)(7)(C);(b)(7)(F)	(b)(7)(E)	6. File Title	≓I
At:San Francisco, CA		MDMA	
7. Closed Requested Action Completed Action Requested By:		8. Date Prepared 1/23/01	
9. Other Officers:	•		

SYNOPSIS:

On 1/11/01, I/A ^{(b)(7)(C);(b)(7)(F)} attending a one-day class entitled "The Rave & Club Culture/Designer Drugs" in San Mateo, CA. This class was sponsored by the California Narcotics Officer Association (CNOA). This class was taught by Sgt. ^{(b)(7)(C);(b)(7)(F)} a retired Torrance, CA Police Department detective. ^{(b)(7)(C);(b)(7)(F)} has been going to raves since 1992 and is extremely knowlegable in this area.

DETAILS

Detective gave the following in-depth overview of the rave culture and scene:

1. The Rave Culture and History:

10. Report Re: The Rave Culture and Drug Intelligence

Rave parties (hereafter raves) began about 1987. The music and culture evolved from disco via clubs in Chicago, Detroit, New York and Great Britain. Disk jockeys (DJ's hereafter) working together made techno music. This music came to the U.S. in 1990 and by about 1996, techno music became really popular. But ecstasy use, popular at raves, has gone beyond the raves. The San Francisco Bay Area has more raves and venues than any other place. At most raves, about 80% of the people are under the influence.

2. The Music and Dance

11. Distribution: Division see last page	12. Signature (Agent) I / A ^{(b)(7)(C);(b)(7)(F)}	13. Date 11/07/01
District	14. Approved (Name and Title) (b)(7)(C);(b)(7)(F)	15. Date
Other	Group Supervisor	
DEA Form - 6 (Jul. 1996)	DEA SENSITIVE Drug Enforcement Administration	
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REPORT OF INVESTIGATION (Continuation)	1. Eile No 2. G-DEP Identifier (b)(7)(E) 3. File Title
4. Page 2 of 13	MDMA
5 <u>. Program Code</u> (b)(7)(E)	6. Date Prepared 1/23/01

A rave is defined by the music. The types of rave music are as follows:

a. Techno - electronic and fast, classic rave music

- b. Hardcore 140 bpm (beats per minute)
- c. Trance gentle, but fast
- d. Ambient slowed down trance
- e. House 120 bpm evolved disco
- f. Garage funkier jazz, lyrics
- g. Jungle drum and bass, hip hop

3. Rave Promoters and Organizers

a. To promote a rave, a promoter must advertise. Most raves have a cover charge between \$5 and \$35. A promoter must hire DJ's, rent equipment and security, sell water, etc. With multiple DJ's, a promoter can make high profits. Internationally known DJ's can make \$20,000 for two hours of work. If the rave promoter is not the rave club owner, he/she must find a venue, such as a warehouses, field, club, auditorium, etc. Most promoters/organizers will lie about the true use of the venue they are renting. They will say they are organizing an "electronic music event", not a rave.

b. Promoters make more money on water sold at a rave than on the ticket sales. A \$1.00 bottle of water will sell for \$4.00 to \$9.00 at a rave. Most raves will not allow ravers to bring in their own water, candy or food. Ecstasy is an appetite suppressant and alcohol will ruin the ravers "trip".

c. Security guards are hired for a rave in order to protect the promoter/organizer, thus they don't want any incidents or arrests which would draw attention. Some medical personnel are hired for a rave. Most deaths at raves are from DUI's and suicide. ROCKMED is a medical group that travels with the Grateful Dead and may be hired to assist at a rave.

d. Most promoters/organizers know about the drug trafficking at a rave and know who the dealers are. The VIP tent or room at a rave, is usually where the promoter, DJ's and dealers are found. If a promoter/organizer is self employed, he must report his income to the IRS on a quarterly

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> Previous edition dated 8/94 may be used. Page 654

REPORT OF INVESTIGATION (Continuation)	1. <u>File No.</u> (b)(7)(E) 3. File Title	2. G-DEP Identifier
4. Page 3 of 13	MDMA	
5. Program Code (b)(7)(E)	6. Date Prepared 1/23/01	

basis. The identity of a promoter/organizer may be found at www.whois.com. INSOMNIAC is one of the biggest rave promoters. The owner of INSOMNIAC made \$2 million at his last large rave in Southern California.

e. Promoters/organizers will have to sign contracts in order to secure a venue. Someone will have to review the contents of a contract and the wording. Permit issuers and code enforcement officials must be educated.

4. Finding a Rave:

The Internet is the source to find a rave. Underground rave websites use Internet Secure, a software program, in order to have secure bulletin boards in which to post information about a rave.



5. Rave Flyers

a. Rave flyers are found on the Internet or at record stores (on the floor by the door).

b. Information on a rave flyer often has clues. Multiple area codes listed for information on a rave flyer, indicate a huge rave. But flyers can be misleading, because if it says to expect 10,000 people, 30,000 may actually show up. If more people show up, then more security is needed.

c. There are several ways that rave flyers conceal a rave location: 1) toll free numbers for information, 2) call back on the night of the rave after 6:00 or 8:00 p.m. to receive directions, 3) go to a record store and buy tickets to get directions, and 4) go to a payphone and get directions.

DEA Form - 6a (Jul. 1996)

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Previous edition dated 8/94 may be used. Page 655

REPORT OF INVESTIGATION (Continuation)	1. File No. 2. G-DEP Identifier (b)(7)(E) 3. File Title
4. Page 4 of 13	MDMA
5 <u>Program Code</u> (b)(7)(E)	6. Date Prepared 1/23/01

d. Undercover officers may find the location of a rave by calling the phone number for a vendor package. Use a undercover phone and/or undercover e-mail address. One posing as a vendor may be able to get in by 12:00 p.m. on the day of the rave.

6. Types of Raves:

a. Underground Raves - in warehouses with boarded up windows, a fence around it and pit bull dogs guarding it. Water bottles in the trash will indicate someone may be living at the warehouse. There is more drug use at underground raves than in restaurants or rave clubs. Other underground raves are held next to record stores - a neon ecstasy sign and surveillance cameras are indicators.

b. Club Raves - at clubs, restaurants, etc.

c. Massive Raves (massives hereafter) - fairgrounds, rural sites. Rural sites are problematic because of the distance from hospitals and the need for helicopters to medi-vac people out.

d. Common Facilities Raves - coliseums and arenas often have massive raves.

e. Many of vendors at raves are selling dope.

7. Enforcement Techniques:

a. Security personnel often throw out drugs they confiscate, because they are paid for crowd control only. If they arrest someone, they won't get hired again.

b. Police, administrators and politicians must be educated about the dangers of raves. Indio and Palm Springs, CA have banned raves.

8. Ravers:

a. Ravers use dust masks or full face masks rubbed with Vicks Vaporub and

DEA Form - 6a (Jul. 1996)

REPORT OF INVESTIGATION (Continuation)	1. File No. 2. G-DEP Identifier (b)(7)(E) 3. File Title
4. Page 5 of 13	MDMA
5. <u>Program Code</u> (b)(7)(E)	6. Date Prepared 1/23/01

inhale to intensify their high. The masks sell for \$3.50 at raves. They will also smear Vicks Vaporub on their upper lip because some promoters won't allow masks. They will also put Vicks Sticks in their noses. If you have a mask on, dealers won't sell you ecstasy, because they figure you already have it. Ravers also use "balm inhalers" with holes poked in them. A raver will blow the balm into the eyes of a fellow raver.

b. Ravers take between one and three ecstasy tablets a night and are often marijuana users also. Ecstasy tablets can last between three and six hours. Ecstasy is a sensual drug that allows the user to let their guard down. Many ravers on ecstasy will get muscle cramps in the first hour. Massages and head rubs are popular and feel as good as sex to ravers.

c. Ravers show up at raves dressed in costumes and wear lots of bracelets. Bracelets on one arm represent bracelets acquired at previous raves. Multiple bracelets on the other arm are to be given to other ravers.

d. Pacifiers, lollypops and/or light sticks prevent ravers from grinding their teeth.

e. Ravers have an enhanced sense of sight. They use glow sticks and micro lights to enhance the experience. Glow sticks are sold in gas stations near the Mojave Desert.

f. Candy ravers are the young ravers (ages 13-16). They like fuzzy animal backpacks, telebubbies, Winnie the Pooh, etc. They dress like children and wear lots of colors.

g. Japanese animation is becoming part of the rave scene.

h. Some ravers come already dressed, other dress at the raves.

i. Old ravers in the Bay Area are not looked upon suspiciously, because there are so many old hippies.

j. Ravers drink Red Bull, not Gatorade, because it has caffeine in it.

REPORT OF INVESTIGATION (Continuation)	1. File No. (b)(7)(E) 3. File Title	2. G-DEP Identifier
4. Page 6 of 13	MDMA	
5. <u>Program Code</u> (b)(7)(E)	6. Date Prepared 1/23/01	

9. Finding an Ecstasy Dealer location:

a. Parking lot ecstasy dealers are usually obvious. Parking lot dealers generally only have a few tabs on them. Other dealers can be found in the smoking area outside.

b. Once inside the door of a rave, payment may be made to one person, then the ecstasy is obtained from another person (say the guy in the red hat).

c. The dealers are usually sober; they don't dance but act like they're on a mission.

d. The owner of a club or the promoter usually knows the dealer. There is more business at a club with ecstasy being sold at a rave.

e. Foot traffic into and out of a rave club may be common. The money could be in the office of the promoter and the dope could be in a car for instance. Surveillance can identify the dealers, and where the dope and/or money are stashed. The "lay-off man" (the guy watching the parking lot) may have the rest of the dope and he's also protecting the dealer.

f. The Shell Game: Hugs are a way of exchanging dope by putting pills in the back pocket of someone's pants.

g. A lot of dealers wear pagers and people purchase ecstasy before a rave. Seattle arrests dealers <u>before</u> the raves, not at the raves by just calling the dealer's pager.

h. Posing as a security guard to escort a dealer out of a rave does not raise suspicion. Ravers know that security guards don't arrest people at raves.

i. Dealers have runners. If all the runners are selling the same type of pill, the source can be identified.

10. Miscellaneous rave culture:

a. The motto of a rave: Peace, love, unity, respect = PLUR

DEA Form - 6a (Jul. 1996)



REPORT OF INVESTIGATION	1. <u>File No.</u> (b)(7)(E) 2. G-DEP Identifier	
(Continuation)	3. File Title	
4. Page 7 of 13		
5. Program Code (b)(7)(E)	6. Date Prepared 1/23/01	

b. Drop, roll and ecstasy are code words for drugs/doing drugs.

c. Lotus is a popular rave magazine that is produced in Los Angeles, CA.

d. DANCE SAFE - a harm reduction organization based in Oakland, CA. Dance Safe has chapters in Oakland, Seattle and Canada. They will test suspected drugs at raves and post the results on their website: www.dancesafe.org. They have a slide show on MDMA on their website. They don't clean the razor blade when testing ecstasy tablets, so they have cross contamination. They use the marquis reagent kit, so they have a lot of false positives and cannot identify other narcotic substances in the pills.

e. Historical rave intelligence can be obtained at www.ravedata.com.

f. You can run rave promoters in www.whois.com for current intelligence.

g. SHA SHA SHOES has a web site that sells shoes with hidden compartments at: www.sha-sha.com

h. Ravers hide drugs in candy, breath mints and in Pez containers.

i. Three stores in California that sell rave clothing and paraphernalia are HOT TOPICS, MR. RAGS and GADZOOKS.

j. KIKWEAR makes pants with hidden compartments and HEADCASE makes ballpark hats with hidden compartments for drugs. They also make shirts with a hidden compartment inside the label for drugs.

k. "EKG" = Ecstasy, Ketamine and GHB.

11. Club Drugs:

- a. Popular rave drugs include: Ecstasy, GHB and its analogs, Ketamine, LSD and Nitrous oxide.
- b. LSD and MDMA are a very common combinations (called candy flipping).

DEA Form - 6a (Jul. 1996)

REPORT OF INVESTIGATION (Continuation)	1. File No. (b)(7)(E) 3. File Title	2. G-DEP Identifier
4. Page 8 of 13		
5. Program Code (b)(7)(E)	6. Date Prepared 1/23/01	

c. Ketamine and MDMA (kiddie flipping)

d. Mushrooms and MDMA (hippie flipping)

e. Ravers put LSD on one bead of a necklace. They then put a glow light on the beads to find out which one has the LSD on it.

12. MDMA Facts and Intelligence:

a. MDMA is a hallucinogen stimulant, without hallucinations. MDMA is not an analog of methamphetamine. MDMA is in the Federal analog law, not in the California Health and Safety law.

b. Alexander SHULGIN is a chemist and psychopharmacologist who authored several books on MDMA in which he recommended MDMA for couples therapy. SHULGIN made MDMA in the 1970's. SHULGIN, his wife and a group of 11 people took MDMA in the 1970's. SHULGIN wrote about their experiences in "Tihkal = Triptomines I have Known and Loved" and in "Pihkal = Phenylamines I have Known and Loved."

c. The timeline of MDMA: In 1913, MDMA was patented by Merck, but it was never used. In the 1980's, San Francisco area psychologists treated individuals in couples therapy and sexually abused people with MDMA. In 1985, DEA put MDMA on Schedule 1 after people abused it. In 1994, the FDA allowed several universities to conduct experiments with both safe and overdose amounts of MDMA.

d. MDMA has never been marketed legally, but Sigma manufactures MDMA for testing purposes only and they have labs worldwide. Sigma's website is: www.sigma.com.

e. About 90% of illicitly manufactured MDMA comes from The Netherlands and Belgium.

<u>ANALYST'S NOTE:</u> Per DEA HQS, specifically, the Braban and Limburg provinces of The Netherlands and Northern Belgium are known to have illicit MDMA labs.

DEA Form - 6a (Jul. 1996) DEA SENSITIVE Drug Enforcement Administration

REPORT OF INVESTIGATION	1. File No. (b)(7)(E)	2. G-DEP Identifier
(Continuation)	3. File Title	
4. Page 9 of 13	MDMA	
5. Program Code (b)(7)(E)	6. Date Prepared 1/23/01	

f. MDMA chemicals can be obtained within a two day's drive of The Netherlands and Northern Belgium lab sites. Germany is one of the biggest chemical precursor producers. Safrole or Isofrole or Bromosafrole are the most common MDMA precursors. Pill presses are also easy to obtain.

g. The Dutch have a Synthetic Drug Task Force that targets clandestine MDMA labs.

h. Approximately 90% of MDMA trafficking is controlled by Israeli and or Russian organized crime groups. These groups control the labs, chemicals, chemists, and pill presses. Israeli organized crime groups are known to have satellite encrypted phones. Arab organized crime members are exchanging drugs for arms. When Russian organized crime traffickers arrive in the U.S., they hand off the MDMA to relatives and then they are out of the picture.

ANALYST'S NOTE: Per HQS, Russian organized crime members used to produce amphetamines and have now switched to MDMA.

i. MDMA is smuggled via Spain, France and Germany to the U.S. by couriers on planes or in cargo. MDMA is also smuggled via commercial mail carriers, such as UPS, Fed Ex and the U.S. Postal Service.

j. The U.S. is the largest consumer of MDMA, with the United Kingdom and Australia following. Australian drug users use more MDMA than cocaine.

k. The clandestine manufacture of MDMA in the U.S. is often the work of a a college student or someone with a chemistry background. MDMA precursor chemicals are much easier to obtain in Mexico and Canada. MDMA can be made by methamphetamine cooks.

1. Rave clubs in Tijuana are owned by Mexican drug traffickers.

m. Approximately 70% of the MDMA on the streets is pure MDMA and 30% is Ketamine, PCP or MDA.

n. A drug that Detective $\frac{(b)(7)(C):(b)}{f_{1}(F)}$ obtained via the Internet from Amsterdam was "2CT7", which is not controlled, but causes hallucinations. He bought

DEA Form - 6a (Jul. 1996)

DEA SENSITIVE Drug Enforcement Administration

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> Previous edition dated 8/94 may be used. Page 661

REPORT OF INVESTIGATION (Continuation)	1. File No. 2. G-DEP Identifier (b)(7)(E) 3. File Title MDMA 1. MDMA
4. Page 10 of 13	FILFIA
5. Program Code (b)(7)(E)	6. Date Prepared 1/23/01

three tablets for \$25. The tablets were sold for that price because the web site operators market it as MDMA.

o. One "boat" of MDMA is 1,000 tablets, 1/2 boat = 500 tablets, 5 boats contain 5,000 tablets.

p. MDMA street names include: beans, rolls, ecstasy, party favors, tabs, candy, X, bombs.

q. MDMA prices: Wholesale lab manufacturing cost per tablet is \$.20-\$.25 in Europe. The lab then sells them for \$1-2 to a middle man. European bulk wholesale price are \$4-6 per tab, plus or minus. USA bulk wholesale prices are \$6-8 per tab plus or minus. USA street prices are \$15-50 per tablet.

r. MDMA prices inside a rave are \$20.00 per MDMA tablet, and \$25 per tablet in the parking lot of a rave. Most dealers figure on two tabs per person per night. MDMA lasts 4-6 hours and users often take one every four hours. Dealers don't have more MDMA than they can sell at the raves or clubs. People under the influence will give ravers MDMA, because they want everyone to feel good.

s. A dealer handling two boats for a weekend rave is only two levels from the source. The next level would be the person who buys his or her boats from the person with a tie to organized crime. The next level is the European connection.

t. Some San Francisco rave clubs are owned by Russian organized crime figures. And their dealers may be organized crime figures too. Half the rave promoters are actually located in record stores.

13. MDMA Powder:

a. Ecstasy powder is often found in capsule form. MDMA is not snorted because it tastes bad, that's why it's put into capsules or tabletted.

DEA Form - 6a (Jul. 1996) DEA SENSITIVE Drug Enforcement Administration

REPORT OF INVESTIGATION (Continuation)	1. File No. (b)(7)(E) 3. File Title	2. G-DEP Identifier
4. Page 11 of 13	MDMA	
5 <u>. Program Code</u> (b)(7)(E)	6. Date Prepared 1/23/01	

b. Homemade tabletting operations are used by spreading MDMA powder onto plexiglass and punching out tablets. You can buy encapsulating boxes and empty capsules at natural food stores and or herbal shops.

14. MDMA Tablets:

a. Weight: 50-400 mg., width: 3mm-12mm, thickness: 2mm-8mm

b. If a tablets has no binder and no coating, it is most likely made in the U.S. If a tablet does have a binder and coating, it is most likely made in Europe.

c. Tabletting machines that are sold must be registered with DEA.

15. Tablet Dies:

a. The tablet dies used in making MDMA tablets are designed by lasers.

b. You can buy tablet dies in the U.S. for \$125-150 or from India via the Internet for \$25.

16. MDMA Look-a-Likes:

a. MDA (after MDMA, the second most sold drug at raves)

b. DXM (after MDA, the third most sold drug at raves)

- c. MDE
- d. Ephedrine
- e. Caffeine

17. Herbal MDMA:

a. Herbal MDMA tablets have kava, pseudoephedrine or caffeine in them. They all have either a butterfly or an X on them. There are also herbal MDMA cigarettes.

18. Miscellaneous notes on other Club Drugs:

a. Ravers who use nitrous oxide are called Heavier-Than-Air-Heads.

DEA Form - 6a (Jul. 1996)

DEA SENSITIVE Drug Enforcement Administration

REPORT OF INVESTIGATION (Continuation)	1. File No. (b)(7)(E) 3. File Title	2. G-DEP Identifier
4. Page 12 of 13	MDMA	
5. Program Code (b)(7)(E)	6. Date Prepared 1/23/01	4

b. Nitrous oxide is not used inside rave clubs because it's too obvious. Trucks come to outdoor raves with large canisters of nitrous oxide and balloons. At outdoor raves, hundreds of spent nitrous oxide cartridges are evident.

c. Nitrous oxide doesn't show up in the blood or urine because it is exhaled. Nitrous oxide costs \$5 per balloon.

19. GHB Rapist Methods of Operations:

a. GHB is found at bars, raves and parties. Rapists use eyedroppers filled with GHB or GBL which is then dropped into the drinks of victims.

b. One dose of GHB is strong enough to cause amnesia.

c. The Guardian Angel company out of Nevada has some new test strips that women can use to test their drinks for GHB, but not GBL.

20. Ketamine:

a. Ketamine, Ketalar and Ketaset are analogs of PCP. Ketamine is a muscle relaxant and anesthetic. Ketamine is ¼ the strength of PCP.

b. People sound drunk on Ketamine, but their pulse is racing and they feel numb.

c. The preferred dosage of Ketamine is 10 ml. Ketamine comes medically in a liquid injectible form. The powder can also be snorted (when the liquid is dried in a microwave). A high dose is 150+ mg and will cause hallucinations. One gram of Ketamine powder costs approximately \$60.

d. Ketamine was used extensively in Vietnam.

e. Ketamine is currently used on animal and humans (10% in surgery in humans (pediatricians) and 90% in animals) in surgery.

f. Ketamine street names include: K, Ket, Special K, K-land, K-head, Vitamin K, Kit Kat, Super Acid, Super K, and K Hole.

DEA Form - 6a (Jul. 1996)

DEA SENSITIVE Drug Enforcement Administration

REPORT OF INVESTIGATION	1. File No. (b)(7)(E) 2. G-DEP Identifie	n
(Continuation)	3. File Title	
4. Page 13 of 13	MDMA	
5. Program Code (b)(7)(E)	6. Date Prepared 1/23/01	

g. Ketamine abusers may work in a veterinary clinic (or break into one) or go to Mexico to obtain Ketamine.

h. Ketamine leaves one's blood in 2-3 hours and the urine in 36-48 hours. Ketamine is NOT detected with drug field test kits.

INDEXING

1. ROCKMED - NADDIS ^{(b)(7)(E)} (WS) w <u>ww.rockme</u> d.org
2. INSOMNIAC ENTERPRISES - NADDIS # (b)(7)(E) (WS) www.insomniac-usa.com
3. DANCE SAFE - NADDIS #(b)(7)(E)
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9. HEADCASE - NADDIS (b)(7)(E) (WS) www.headcase.com
10. www.bluelight.nu - NADDIS # (b)(7)(E)
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12. www.ravedata.com - NADDIS (b)(7)(E)
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DEA SENSITIVE Drug Enforcement Administration

REPORT OF INVESTIGATION		1 Eile No (b)(7)(E)	2. G-DEP Identifier (b)(7)(E)
	(Continuation)	3. File Title (b)(7)(C)	
4.			
Page 2 of 7 5. Program Code		6. Date Prepared	
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		1. File No. (b)(7)(E)	2. G-DEP Identifier (b)(7)(E)
	REPORT OF INVESTIGATION (Continuation)	3. File Title (b)(7)(C)	
4.			
Page 3 of 5. Program Code		6. Date Prepared	
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