FERSONAL HISTORY REPORT

			I. GEI	NERAL	(Comp	lete for all	l submi	ssions)				
1. Purpose of S	ubmission	300 W 30 W		0.775.00.00	/ Informa	-0.01 (2.00.00.000)			3. Prog	ram Code)	140 <u>7.40</u>
	ormant Establis	shment			3-95-	0024	5 37 0			-		
	DEP Classifica			4. File		v. 43				5	(b)(7)(E)	<u>n</u> tifier
Arı	rest			6. Grou		N, Alex	ander		7 Date	Prepared	S 201 MED N	<u> </u>
☐ Fu	gitive Declarati	on		POSTER TURNING	lan L	ah			A STATE OF THE PARTY OF THE PAR	1 No North Manager Control	· -5, 199	<i>L</i> L
8. Name (Last,	First, Middle)	92 Desir Visito de Visito de la compansión de			ıaıı ı		9. Occi	upation	X =6	8.00	-J• ±77	
		er Theodor					-		, Author		9) 2002 - 50	
	o., street, city, Igin Road	State/Country, Z	ip Coae)				11. EM	рюуег ма	me and A	adress		
Lafayett	The state of the s	1					Se	lf Emp	loyed			
12. Phone No. &	Area Code	13. Date of Birth	14. P	lace of Birth	(City, St	ate/Country)		15. Citize	enship (Cou	intry)	16. Ethnicity	
510-934-1	493	06-17-25	ι	Inknown				U.S.			Hispanic Unknow	Hispanic
17. Race	[X]	White	П	Black		8 8 8	18. Alie	ก		Illega	d	
☐ American I	ndian/Eskimo		/Pacific Isla		П	Unknown		gal / Alien	ı			
	Height	21. Weight	22. Eyes		23. Hai		San and	×.	haracterist	ics (scars.	tatoos, etc.)	ZHE-12. 2
XM	<u> </u>	M-WW. Source	El attuició (178				- Dr. Harry Brow			-	AS YER	
	' 03"	200 1bs		:	Gra	y	Bear	rd			ar.	
25a. Driver's Lic	ense No.	25b. State/0	Country	26a. Pass	port No.		26b. Is	suing Cou	intry		*	26c. Expiration Date
Y0743101		CA/USA		Unkn	own		Unl	known				Unknown
27. NADDIS No	• 5	28. FBI	No.	<u> </u>		29. Social	Security I	No.		30. DEA	Registration	No.
294983, 1	904492	No	ne		34 34 34 34	Unkno	wn			PS00	61616	
31. Aliases / Oth	er Names			24				1-21100				70 Miles 5
	10 3103	II. INF	ORMANT	ESTAB	LISHM	ENT (Coi	mplete i	as appr	opriate)		******	
32. Category	250	and the grant	1	2-11-12-12-12-23			33.		•	194	. CIS No.	
Regular [Defendant	Restricted Use	Forei Regis	gn	For Paym	ent		nitial iblishment		icti-	. 0.0 110.	
	111.	G-DEP CLA										······································
35. Submission		(b)(7)(E)	ss of Violato	•			SALADAR SECTION	37 G-DI	FP Drun C	ode Under	Which Class	ified
Initial X	Supplemental	N. 10 A. 1										
38. Date of Arres			V. ARRI	EST (Cor	nplete	for all Arre			s) —	345365 to		
So. Date of Affes	al.	a. City		* *	2.72	b. Count		ARREST		- C	State / Cou	ntry
						Lance Commercial Co.	×					,
40a. Armed 4 at Arrest	Ob. If Armed (enter Number o	f Weapons t	у Туре)				1. 1	41а. Тур	e of Violati	on <i>(Posse</i> ss	sion, Sale, etc.)
Yes	TYPE	Handgun	Rifle	Shotgun	Lethal	Cutting ument V	Other Veapon	3		700 8 3	os se respectivo	
□ No	Semi - Auto Full Auto									or Drug V eroin, coca	iolator was C ine, etc.)	harged With
ا ۱۰۰۰	Other											
		v.	FUGITIVE	DECLA	RATIO	N (Compl	lete as	appropri	iate)		3. 3	
42. Type Prearrest	43. NCIC	No.		[4	4. Appre Resp	ehension onsibility	45.	DEA Co		n (Name	and Phone N	o. – Include
Post Arrest					DE	EA 🗌 USA	AS					
46. Warrant No.	47	7. Date / Place of	Issue (Cit)	& State)				48	. USMS O	ffice Holdi	ng Warrant	City & State)
	, gg -1						3					

DEA Form (Jan. 1994) - 202

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)	
(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 R3-93-2077, 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 294983, 1904492.

59. AGENT'S NAME (Print or Type) (b)(7)(C),(b)(7)(F) TFA),(b)(7)(F)		DATE 18-5-94
62. SUPERVISOR'S NAME (Print or Type) (b)(7)(C),(b)(7)(F) G/S		64	DATE / 94
65. REVIEWED BY	TYES TNO		
HEADQUAR	APPROVAL (If appropriate)	180 11 22 180 150 150	5/15/2 2 AWAS 1
68. REVIEWED BY	69. Office Symbol	70. CONCURRENCE	71. DATE

U.S. Department of Justice Drug Enforcement Administration

REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

1. HOW C	BTAINED (C	heck)	Purchase	Deizure	n.,	e Sample		2a. FILI	E NO.		2b. PR	OGRAM CODE	3. G-DEP ID
Lab.	Seizure	Money F	lashed Comp		200	(A) =	* *	1000 -					(b)(7)(E)
Othe	er (Specify						-	R3-	95-002	24	ZH XH	. I S.	e
4a. WHEI	RE OBTAINE	D (City, Sta	ste/Country)	4b. DATE	OBTAINED)	1	5. FILE	TITLE	, F 194 V	I ale		
6 HEFE	RHINGIAGE	NCY (Name)	10-27 6b. REFE		*	-	SHUL	GIN,	Alexande	r	2	a
	- 2	# # # # # # # # # # # # # # # # # # #	# # # # # # # # # # # # # # # # # # #	Case N	o. OR Se	izure No.	7	, DATE	PREPAI	RED	8.	GROUP NO.	· · · · · · · · · · · · · · · · · · ·
	a: Mit		7 P	No)		7	Covem	ber 2	1994		6	¥
9. Exhibit	10. FD	IN .	11. ALLEGED D	901166	12.	S OR LA					C. GRO	OSS QUANTITY	15. Purchase
No.	(8 chara	icters)	ALLEGEO		WATE	- CA	LLS	(Descri	oe rully)	13. Seize	<u> </u>	14. Submitte	d Cost
	1. 22							210			o ^{ge}	00 E 100	
-1-	12 da	226	PEYOTE C	ACTUS			. I.				2.4	975.3 g	0.0
	1 22	557		1.00710						-	ing all and	167.8 g	0.0
	1	2	PEYOTE C	ACTUS	-			$\overline{}$		-		107.00 g	1
	1205	58	DEVOTE C	TUS								241.0 g	0.0
			121012	710105					$\overline{}$		3	a Deat	
	2500	4 14				<u> </u>	1_ S_	84	\rightarrow		2	1	
				*********			g	3			-	it inco-	
16. WAS	ORIGINAL C	ONTAINER	SUBMITTED SE	PARATE F	ROM DRUG	? []	ud (Included	(evode t			enter exhibit no I container fully	
REMARK	S:	# E		- 1			- 1			R A			
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Admi	Un UCEC	Der 21	pection War	ront fr	om 1483	Chula:	n	Road	Lafa	rette (A.	TFA (b)(7)(C),(b)(7)
AUBI	ruratian	the art	nibits to S	FFD who	re he n	rncess	4	hem	as ev	dence s	e u	itnessed b	v S/A
(b)(7)(C),(b)(7)(F) The	exhibit	ts were the	n trans	ferred	to the	Wes	stern	Regi	onal Lab	orat	tory for	, -,
ana	vsis.			*		the state of the s		(b)(7)(F		7 8 8		235	25 28
(b)((7)(C),(b)(7)(F)					(-7)		(- / · / · /	* 20				
17. SU						18							
TFA													
40.41.	4 OK 4 Od/b\/7	\(C\ (b\\/7\\E			VENID	ENCE							MOR A FRANC
7 H < F	ACKAGE(b)(7)(C),(b)(1)(F) .		te)	11/2	19	4	21. 1	TEN	,		
22. SEAL	7				1	731	1	/	24. TI	LE H	0		
Broken					11/	3/9	4	FI	7.0	" E.	<u> </u>	140	.t.
07-007			LAD	ONATON	Y ANALYS	SIS/COM	PAR	ISON F	REPOR			**************************************	
25. ANAL	YSIS SUMM	ARY AND F	REMARKS	***		35 8		N.E.	.	41.0			
			*	/					- 1		2. 16		
Exhibi	it #1 1	let Wt.	869.1g - c	actus c	detaini	ng mes	cal.	ine	- 1	32 27	2.5	401 18	
Exhibi	it #2 1	let Wt.	106.4g \- c	actus c	ontaini	ng mes	cal:	ine	/			9	#
Exhibi	(t #3	let Wt.	197.6g \ c	actus c	ontaini	ng mes	cal:	ine		- 6			
		3.7	. \										
		32 E										1	©
					J							20 21 ±0	
		#		55							55 - 1	e a e	
26.	27.	28				WE	GHT	PERU	NIT ANA	LYZED	1	32.	33.
Exhibit No.			ACTIVE DRUG (Established or C			29. Stren		7	easure	31. Unit		TOTAL NET	RESERVE
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2		Mesca		100% "00"							T.		62.2g
3	\$ 2 S	Mesca				6 THE P. STREET	200 37		W 380				105.2g
Anwer-sen 👙 seed		20 at at at at a	ก ⁽¹⁾							a Halfs			
		VEV-)(C) (b)(7)(E)								59		
)(C),(b)(7)(F)					<u> </u>	(#)	1	124	•	
	YST (Signatu	re)				35, TITL	E					36. DATE CON	PLETED
(b)(7)(C),(b						Foren		Chem	rist			01/11/95	
37. APPRO	05 15 0 250					38. TITL					1	39. LAB. LOCA	*
(b)(7)(C),(b))(/)(F)	9.		175		Labor.	21.0	re Bi	rocto	~		San Franc	teco CA

U.S.	De	parte	nent	of Ju	ıstice		
Drug	En	force	ment	Adn	ninist	ration	

R	FPC	RT	OF	DRIIG	PRAPE	DTV	COLI	ECTED	DIID	CHASED	OD C	CIZE
п	LEFU	וחי	UF	טטחע	ITHUT	mit	CULL	EUIED.	PUR	CHASED	OH 2	EIZE

Drag Emic	reement Adir	musqamon		, ne	PURI	OF I	JRUG P	RUPERTYC	OLLECTE	J, PURCHASEI	OR SEIZED
1. HOW C	DBTAINED (C	heck)	Purchase	Seizure		Free S	ample	2a. FILE NO.	21	o. PROGRAM CODE	3. G-DEP ID
	Seizure er (Specify	Money i	Flashed Comp	liance Samp	le (Non-C	Crimina	1)	R3-95-00)24	is a	(b)(7)(E)
4a, WHE	RE OBTAINE	D (City, Sta	ate/Country)	4b. DATE	OBTAIN	ED		5. FILE TITLE	\$150gs/		1
Lafa	vette. C	A		10-27	-94		1	SHULGIN.	Alexande	r	
	RRING AGE		9)	6b. REFE		**				-	
	:70		‡n	Case N	o. OR]Seizu	re No,	7. DATE PREPA	200	8. GROUP NO.	
<u>.</u>			Y	No.				November 2		6	
9. Exhibit No.	10. FD	PASSEL COMM.	11. ALLEGED D	RUGS	12. MA	RKS	R LABELS	S (Describe fully)		GROSS QUANTITY	- I di chase
	10 Cilare	2Cter 3/			WAR-17	25	AL 40 -		13. Seized	14, Submitte	ed Cost
4	1223	559	PEYOTE (CACTUS	1					33.7	g 0.0
	1, 22	5/6		3 L CORTO A							
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6	1222	561	PEYOTE (APPLIC	× -	-		$\overline{}$		37.1	7 0 (
	1.00		10101	PRITOS			 			3/•1	g 0.0
			/	39		 	†		+	- 12 - 7 W	-
		7527511							1		
16. WAS (ORIGINAL CO	ONTAINER	SUBMITTED SE	PARATE FE	OM DRI	JG?	Ded	(Included above)		Yes, enter exhibit no	o. and describe
REMARK	s:			9	1			\	or	iginal container fully)
17. SUB TFA 19. No. 1 3 HS 22. SEA Broke 25. ANAL Exhibi	lt #5 N	RY AND F	6.3g - cac 229.8g - c	actus c	NAL	ig me	18. A G CE F 3/9/ COMPAR escal in mescal	ine /	TFA E. C		
EXN1 D1	LE #6 A	iet Wt.	7.0g - dec	tus con	tainir	g m	escalin	e /			
26. Exhibit	27.	28.	ACTIVE DRUG I	NGREDIEN	т		WEIGHT	PER UNIT ANA	LYZED	32.	33.
No.	Lab. No.		(Established or Co			29.	Strength	30. Measure	31. Unit	TOTAL NET	RESERVE
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_5		Mesca		7. 20	500 St - 5	8000		 	_		168.0g
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						-		+			
		(b)(7	7)(C),(b)(7)(F)		7	+-	***	·	1		
34. ANALY	YST (Signatur	e)			100	35.	TITLE	<u> </u>	<u> </u>	36. DATE COM	MPLETED.
(b)(7)(C),(b	ACT COURT CONTRACTOR CONTRACTOR							Chemist		01/11/95	n LEIEU
37. APPRO							TITLE	CHEBISL	a .000	39. LAB. LOCA	TION
(b)(7)(C),(b)(7)(F)	1				7 1255774		ry Directo	r	San Franc	
			The same as			-				1 dil II dilC	-JUJ ON



		·		FILE NUMBER		DATE	-		
.8.	DISPOSITION OF D	RUG EVIDENCE		R3-95-0024			/96		
	(Do NOT Use For Non			SHULGIN, A)	exander				
	Name of Field Office and Case Cisco Field Divisi (b),(b)(7)(F)		CUSTODIAN (Name of DEA Laboratory and Laboratory Chief) Western Regional Laboratory (b)(7)(C),(b)(7)(F) Director						
		PAR	ΤΙ						
	f in accordance with Admi	xhibits in this case are no nistration instructions.	longer	needed as evidence	and should	be			
trans	ferred to	(Agency)							
CONTROL OF THE PROPERTY OF THE		AGENT			Т	LABORAT	ORY		
Exhibit No.	Laboratory No.	T	rug		Transferred	T		Stock	
	L22556	Peyote Cactus							
2	L22557	Peyote Cactus				X			
3	L22558	Peyote Cactus				1 /			
- 5	L22559	Peyote Cactus				-5			
$\frac{3}{6}$	L22560 L22561	Peyote Cactus			_	,×			
	L22301	Peyote Cactus				1			
	-					 			
			100	78 M 5 H 5					
(b)(7)(C),(b)	(7)(F) IT (Signature)	9/1/96 DATE		b)(7)(C),(b)(7)(F)		Ā	re dec	<u>h</u>	
On /2	3-94 the forego	oing exhibits were disposed of	M IRAN	ated above.		20 Misso.			
,	(Date)	inter							
On	(Date) the forego	ing exhibits were transferred	DATE OF THE PARTY	(0) (1) (2) (2)		- 150			
EVIDENCE	(b)(7)(C),(b)(7)(F)	(b)(7)(C),(b)(7)(F) LABOHATORY CHIEF (SUPR		(C),(b)(7)(F) Date)	10-	4-9	<u> </u>		
REMARKS				·	- Artista di nua				
# 3 2	Ser 12	×		57					

Other DEA Form (Aug. 1994)

	REPORT OF INVES	TIGATION		Page	7
1. Progr	am Code	2. Cross File	Related Files	3. File No.	4. G-DEP Identifier (b)(7)(E)
5. By:	(b)(7)(C),(b)(7)(F) S/A	1 п		R3-95-0024 6. File Title	
At:	Task Force I			SHULGIN, Alexand	er
	San Francisco, CA				
7. C	osed Requested Action Completed	1 1		8. Date Prepared	
	tion Requested By: r Officers: None	<u> </u>		2-20-97	
9. Otile	r Officers: None				
10. Rep	of Re: Case Closure			34-14 N 12-00-00-00-00-00-00-00-00-00-00-00-00-00	
			XIIIIX III	ALL SECTION AND ASSESSMENT ASSESSMENT AND ASSESSMENT ASSESSME	
DETAI	<u>LS</u> :				
1.	As of the prepared dat	e of this r	eport, this	s case is presently	in the below checked
	status for the purpose	of the CAS	T SUBSYSTE	M RECORD.	
	ACTIVE = A				
	26 CONTRACTOR STEEDS OF THE PROPERTY OF THE PR	DICIAL = J			
31.	PENDING FU	GITIVE = F ON PENDING	- C		9
		UCTION PEND			
	APPEAL PEN				
	X ADMINISTRA NORMAL CLO	TIVE CLOSE SE = NC	= AC		
20	y Constitution and I Household	The state of the s	(b)(7)(0	C),(b)	7 2
2.	On 9/10/96, D/I (b)(7)(C),(b) surrendered his DEA Re		ed S/A (7)(F)	that Alexander Si	
	$D/I_{(7)(F)}^{(b)(7)(C),(b)}$ also told S	/A (b)(7)(C),(b) t	hat all ci	vil action against S	HULGIN was complete.
	V. A. A	CACA			
3.	All required DEA-6's h	ave been co	mpleted and	submitted in the ca	ase.
4.	DEA Form 48 have also				
	DEA Form 48s have been drug evidence was seiz				
	required.	ed. No arr	est was mad	ie, cherefore no bea	rorm 210 1s
c	Board on the chore for	to that all			
5.	Based on the above fac completed, this case i			active and judicial pr	rocedures have been
7.00	to the state of th				
INDEX	ING SECTION:				
1.	SHULGIN, Alexander - N	ADDIS #2949	83.		
11. Dist	ribution: SARI, DOS	12. (b)(7)	(C),(b)(7)(F)		13. Date
Div	vision				2/20/97
Dis	strict	14.			15. Date
	Diversion D/T	C),(b)			2/2014-
DEA Fo	(b)(7)(C),			-	-10/0/

This report is the property of the Drug Enforcement Administration. Neither it nor its contents may be disseminated outside the agency to which loaned.

DEA SENSITIVE **Drug Enforcement Administration**

1 - Prosecutor

R3-95-0024

CASE HAS BEEN CONSOLIDATED - IN FINAL FILE

R3-95-0024 12/03/96

(b)(7)(C),(b)(7)(F)

Asset Removal Group To: From: Group (b)(7)(C),(b)(7)(F) Attention: Date: Request For CAPS Information Case File Closure Review: Case File Status Review: Please send CAPS information for the following cases: R3-95-00 24 TO BE COMPLETED BY ARG Complete for Case File Closure Review Data Analyst Seizure Files are: Received Date Closed (7)(F)Completed Date (b)(7)(C),(b)(7)(F) CAPS Printout Attached? Yes No (b)(7)(C),(b)(7)(F) Legal Technicia G/S, ARG Received Date Date Completed Date Date Forwarded to Group CAPS Printout Attached? -Yes____

(b)(7)(C),(b)(7)(F)

COMPUTERIZED ASSET PROGE

13 JAN 97

SUMMARY - ALL EXHIBITS WITHIN A CASE

CASE NUMBER: R3950024

TOTAL VALUE OF ALL ASSETS:

SO.00

SEIZURE

SYSID EXHIBIT DESCRIPTION OF PROPERTY

*** END OF REPORT ***

*** END OF REPORT ***

SENTER 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

1 5:	REPORT OF INVEST	FIGATION	Page 1 of
5. By: At:	Task Force I San Francisco, CA Requested Action Completed than Requested By: Officers: None	2. Cross Related Files File	3. File No. R3-95-0024 6. File Title SHULGIN, Alexander 8. Date Prepared September 10, 1996
DETAI	LS:		nis case is presently in the below checked
	X DRUG DESTRI	SITIVE = F ON PENDING = C OCTION PENDING = D DING = P	
2. 7)(C),(b)(7)	PENDING JUI PENDING FUR CIVIL ACTION APPEAL PENI ADMINISTRATION NORMAL CLOSE On 9-10-96, S/A(7)(F) case. D/I told	SITIVE = F ON PENDING = C JCTION PENDING = D DING = P TIVE CLOSE = AC SE = NC Spoke to Diversion S/A(b)(7)(C),(b) that all surrendered his DE	Investigator (b)(7)(C),(b)(7)(F) regarding this civil action against Alexander SHULGIN registration and paid a \$25,000.00 civi

DEA Form - ((Aug. 1994)	3	DEA SENSITIVE Drug Enforcement Administrati	on 3 - Originating Office
Other	Diversion,	D/I(b)(7)(C),(b)	7/10/90
District		14	15. Date
Division			9/10/96
11. Distribution:	SARI	12 (b)(7)(C),(b)(7)(F)	13. Date

3 - Originating Office

REPORT OF INVEST	TIGATION	*****	Pag	e 1 of
1. Program Code	2. Cross File	Related Files	3. File No.	4. G-DEP Identifier (b)(7)(E)
5. By: (b)(7)(C),(b)(7)(F) TFA			R3-95-0024 6. File Title	-
At Clan Lab Task Force San Francisco, CA			SHULGIN, Alexand	der
7. Closed Requested Action Completed Action Requested By:			8. Date Prepared	
9. Other Officers: None	10-20 <u>2009-</u> 1		April 17, 1996	77
10. Report Re: Case Status				
DETAILS:				
1. As of the prepared date status for the purpose	of this	report, this ST SUBSYSTER	case is presently RECORD.	in the below checked
ACTIVE = A				
PENDING JUD	ICIAL = J			
PENDING FUG	ITIVE = F			
X CIVIL ACTIO	N PENDING	= C		
DRUG DESTRU	CTION PEN	DING = D		
APPEAL PEND	ING = P			
ADMINISTRAT	IVE CLOSE	= AC		
NORMAL CLOS	E = NC		R	
INDEXING SECTION: None				

11. Distribution: SARI Division	(b)(7)(C),(b)(7)(F)	- name of the	13, Date
District			4-13-96 15. Date
Other (b)(7)(C),(b)	CN/UK	r	4/18/90
DEA Form (Aug. 1994) - 6 (7)(F)	DEA SENSITIVE Drug Enforcement Administration	3 - Origina	ating Office

REPORT OF INVEST	Page 1 of		
1. Program Code 5. By: (b)(7)(C),(b)(7)(F) At: Clan Lab Task Force San Francisco, CA	2. Cross File Related Files	3. File No. R3-95-0024 6. File Title SHULGIN, Alexander	
Closed Requested Action Completed Action Requested By:		8. Date Prepared October 16, 1995	
9. Other Officers: None	4 1 20 100 100		
10. Report Re: Change in G-Dep	Identifier.		

DETAILS:

-

Reference is made to a current change in G-Dep classification. The new G-Dep is

INDEXING SECTION:

NONE

DEA Form (Aug. 1994) - 6	DEA SENSITIVE Drug Enforcement Administration	3 - Originating Office
Other		10/19/51
District		15. Date
11. Distribution: SARI, UN Division		13. Date
11. Distribution: SARI, OW	(b)(7)(C),(b)(7)(F)	

3 - Originating Office

REPORT OF INVES	STIGATION		1/30	Page 1 of	1
1. Program Code	2. Cross R File	elated Files 3.	File No. R3-95-0024	4. G-DEP (b)(7)(E	dentifier
5. By: (b)(7)(C),(b)(7)(F) TFA At: Clan Lab Task Force San Francisco, CA		6.	File Title SHULGIN, Ale	exander	
7. Closed Requested Action Completed Action Requested By:		8.	Date Prepared October 3, 1	005	
9. Other Officers: None			0000001 3,	777	3
10. Report Re: Case Status				***************************************	
DETAILS: 1. As of the prepared da status for the purpos	te of this repector	port, this SUBSYSTEM	case is presen	itly in the b	elow checked
ACTIVE =	A				
PENDING J	UDICIAL = J				
PENDING F	UGITIVE = F				
X CIVIL ACT	ION PENDING =	С		ğ	
DRUG DEST	RUCTION PENDIN	NG = D		20	
APPEAL PE	NDING = P				
ADMINISTR	ATIVE CLOSE =	AC		9	
NORMAL CL	OSE = NC				
2. On October 3, 1995, T regarding this invest pending Civil Action active.	lgation. D/Ц	7)(F) to1		hat SHULGIN	is still
INDEXING SECTION:				3	
1. SHULGIN, Alexander -	NADDIS not ava	ailable.		2	
11. Distribution: Division District Other (b)(7)(C),(b)	1 (b)(7)(C),(b)	(7)(F)	en Pe	rvisor	13. Date 10-10-9 15. Date 10/11/97
DEA Form (Aug. 1994) - 6		SENSITIVE	ation	3 - O rigi natii	ng Office

REPORT	OF INVEST	IGATION		100 000	Page 1 of	4
Program Code		2. Cross File	Related Files	3. File No.	4. G-DE (b)(7	P Identifier
5. By: (b)(7)(C),(b)(7)(F) At: Clan Lab Task San Francisco			÷	6. File Title SHULGIN, Ale	exander	
7. Closed Requested Activ	ion Completed			8. Date Prepared		
Action Requested By: 9. Other Officers: Non		81814 1707		June 28, 199)5	***
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DETAILS: 1. As of the prestatus for the	pared date	of this r	eport, thi	s case is preser M RECORD.	ntly in the	below checked
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			编月			
11. Distribution: AMRI, C	W((b)(7)(C),(b)(7)(F)			13. Date
District					.	070395 15. Date
Other		*			or	7/3/91
DEA Form - 6 (Aug. 1994)			EA SENSITIVI		2 Origina	ting Office

This report is the property of the Drug Enforcement Administration. Neither it nor its contents may be disseminated outside the agency to which loaned.

3 - Originating Office

1:

REPORT OF INVES	TIGATION		P	age 1 of
1. Program Code 1. Program Code 5. By: (b)(7)(C),(b)(7)(F) TFA Clan Lab Task Force San Francisco, CA 7. Closed Requested Action Completed	2. Cross File	Related Files	3. File No. R3-95-0024 6. File Title SHULGIN, Alexa	4. G-DEP Identifier (b)(7)(E)
Action Requested By: 9. Other Officers: YOTIE			May 1, 1995	
10. Report Re: Quarterly Statu	s: (C) Cr	ange Irom P	revious Month Yes	<u>X</u> NO
DETAILS: 1. As of the prepared data status for the purpose	e of this of the CA	report, thi ST SUBSYSTE	s case is presentl M RECORD.	ly in the below checked
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APPEAL PENI	DING = P			
ADMINISTRA	TIVE CLOSE	= AC		
NORMAL CLOS	SE = NC			
2. On May 2, 1995, TFA $(7)(F)$ that on April 14 is seeking a Fed $(7)(F)$ complaint.	was a 1, 1995, S Jeral Civi	HULGIN was : 1 Complaint	in the Northern D	ce to Show Cause. D/I
INDEXING SECTION:	ø			
None.		(O) (b)(Z)(E)		
11. Distribution: Division District Other (b)(7)(C),(b)	12 14	(C),(b)(7)(F)		13. Date 5-12-95 15. Date 5/2/95
DEA Form (Aug. 1994) - 6		DEA SENSITIV nforcement Admin		3 - Originating Office

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PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE NO. R3-95-0024	(b)(7)(E) DENTIFIER
(b)(7)(C),(b)(7)(F)	1 n		6. FILE TITLE	
Clan Lab Task Force	1 8	50	SHULGIN, Alexand	der
AT: San Francisco, CA	ΙÄ			
Closed Requested Action Completed	٦ō		S. DATE PREPARED	•
Action Requested By:	8 18 B AB A	PP1 CAME!	November 1, 199	4
TACTION Requested By: OTHER OFFICERS: See paragraph	-other o	illuers .		
REPORT RE: Execution of Fede	ral Admi	nistrative Ins	pection Warrant	and
isition of drug exhibits 1				
			271	
DEFENDANTS:	/	Alexander SHUL	GIN /	
DOB:	<i>(</i>)	06/17/25 Unknown	1	
POB:/ ADDRESS:			d., Lafayette, C	٨
CA Driver's License:		1403 Shargin 1	de, Larayerte, o	
CA Dilver a License.	1	1014301		
VIOLATION		11363 Calif. H	lealth and Safety	Code.
			ivating, and Pro	
		Peyote.	/	
		,	/	
JUDICIAL DISTRICT:	19	Contra Costa/C	County District A	ttorney's
	9	Office. /		
DATE AND TIME		/	200	
OF INCIDENT:	4	october 21, in	194, at 9:00 am.	
STODY OF EVIDENCE:				
TODA OF ENDINGER		/ ,		
G EXHIBITS:	/	′ /		
<u> </u>				
On October 27, 1994, a F	edepal A	dministrative	Inspection Warra	nt was executed at
1483 Shulgin Road, Lafay	rette, CA	. Exhibits 1	through 6 were s	eized by TFA
1483 Shulgin Road, Lafay TFA (b)(7)(C),(b) transported	he exhib	its to the SFI	D where he proce	ssed them as evidence
TFA later transpo	orted the	exhibits to t	the Western Regio	nal Laboratory for
analysis.				
	. 1	las the name	mann the elidina	along doom which
Exhibits 1 through 6 was accesses the kitchen of			near one straing	grass door waten
accesses the kitchen of	Saru aup	1 23.		
Exhibit 1 - is allezed B	evote Ca	ctus.		
Exhibit 1 - is alleged F	(b)(7)	(C),(b)(7)(F)		NI SAN
1. DISTRIBUTIONMRI, ODC				13. DAFE
				11/21
REGION				11/1
DISTRICT				18. DATE
(b)(7)(C),(b)				11/2

REPORT OF INVESTIGATION (Continuation)	1. FILE NO. R3-95-0024 2. G.DEP LOENTIFIER (b)(7)(E)
4.	SHULGIN, Alexander
Page 2 of 3 5. PROGRAM CODE	6. DATE PREPARED
	November 1, 1994
Exhibit 2 - is alleged Peyote Cactus.	
Exhibit 3 - is alleged Peyote Cactus.	a a
Exhibit 4 - is alleged Peyote Cactus.	
Exhibit 5 - is alleged Peyote Cactus.	
Exhibit 6 - is alleged Peyote Cactus.	
NON-DRUG EXHIBITS:	
ACTION ON DEFENDANTS:	
above said address. While at the residen several alleged Peyote Cactus in clay po	ess. SHULGIN was not arrested pending test
OTHER OFFICERS:	
DRUG ENFORCEMENT ADMINISTRATION:	
1. G/S (b)(7)(C),(b) (7)(F) 2. S/A 3. S/A 4. S/A 5. TFA 6. S/A 7. D/I 6. Chemist (b)(7)(C),(b)(7)	
CALIFORNIA DEPARTMENT OF JUSTICE, BUREAU OF NA	RCOTIC ENFORCEMENT:
C),(b)(7) S/A	
CONTRA COSTA COUNTY DISTRICT ATTORNEY'S OFFICE	:
Investigator $(b)(7)(C),(b)(7)$	
DEA Form - 6a (5)(7)(C),(b) DEA SENSITIV DRUG ENFORCEMENT ADM	

REPORT OF INVESTIGATION	1. FILE NO. R3-95-0024 2 (b)(7)(E)
(Continuation)	3. SHULGIN, Alexander
4. Page 3 of 3	
5. PROGRAM CODE	6. DATE PREPARED November 1, 1994
 Investigator (b)(7)(C),(b)(7)(F) Deputy D.A. (b)(7)(C),(b)(7)(F) 	
DETAILS:	
1. Reference is made to DEA-6 File number R3-93-2 (b)(7)(C).(b) dated October 27, 1994.	G-Dep (b)(7)(E) prepared by D/I
2. On October 27, 1994, at approximately 9:00 am, a Federal Administrative Inspection Warrant at CA, because SHULGIN is a DEA registrant and is manufacture controlled substances. TFA (b)(7)(C),(b) alleged Peyote Cactus in clay nots on the portaccesses the kitchen of said residence.	t 1483 Shulgin Road, Lafayette, know, to possess chemicals used to observed in plain view several
(b)(7)(C),(b) $(b)(7)(C),(b)(7)$ $(b)(7)(C),(b)$	removed the alleged Peyote Cactus from
5. D/I(7)(F) debriefed Alexander SHULGIN regardi	ing the Peyote.
6. SHULGIN was not arrested pending further inves	stigation.
7. TFA (7)(F) contacted via telephone Deputy Dist declined to prosecute SHULGIN for possession	trict Attorney (b)(7)(C),(b)(7)(F) who of the Peyote.
8. TFA (7)(F) obtained a copy of the Administration issued by Magistrate Woodruff of the Northern this warrant has been placed in this case file	
INDEXING SECTION:	
1. SULGIN, Alexander: NADDIS #294963.	

DEA Form — 6a (b)(7)(C),(b)

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

REFERENCE REQUEST—FEDERAL RECORDS CENTERS NOTE: Use a separate form f				h request.
SECTION I-TO BE CO	MPLETED BY REQUEST			
ACCESSION NO.	AGENCY BOX NUMBER	RECORDS CEI	NTER LOCATION NUM	MBER
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DESCRIPTION OF RECORD(S) OR INFORMATION REQUESTED				
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FOLDER (include file number and title) 23-95-00	ລັບ			
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				- "
				
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	R USE BY RECORDS C	_ 		
	REMARKS		· · · · · · · · · · · · · · · · · · ·	
RECORDS NOT IN CENTER CUSTODY RECORDS DESTROYED	<u> </u>			
WRONG ACCESSION NUMBER - PLEASE RECHECK		_ 		
WRONG BOX NUMBER - PLEASE RECHECK			30 150 TO 100 TO	
WRONG CENTER LOCATION - PLEASE RECHECK				
ADDITIONAL INFORMATION REQUIRED TO IDENTIFY RECORDS		*)	- 15-20	
MISSING (Neither record(s), Information nor charge card found in container(s) specificd)				1
RECORDS PREVIOUSLY CHARGED OUT TO (Name, agency and date):				+
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				214
	DATE	SERVICE	TIME	SEARCHER'S
SECTION III—TO BE COI	MPLETED BY REQUES	TING AGENCY	<u> </u>	<u></u>
(b)(7)(C),(b)(7)(F)	S DATE 11-7-14		PT OF RECORDS	
LULE AND	1111/19			
IAME AND RODRESS Drug Enforcement Administration ASO Colden Cate Avg. PO Box 36035		Requester please sign, date a	and return this form to	r
450 Golden Gate Avc., PO Box 36035 notice of the state o		file item(s) flated above, ONLY been checked by the Records	If the block to right has	· 🗆
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om no. Id zie rde)		SIGNATURE	61A 11 67 50	DATE
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PREVIOL	IS EDITION USABLE	ž.	OPTIONAL FOR NATIONAL RECORDS A	ANCHIVES A COMINISTRATI

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To ONE OF ORCEMENT ADMINISTRATION, 450 GOLDEN GATE AVE., P.O.
SAN FRANCISCO CA, 94102
P

F:

40	RECE	EIPT FOR CASH OF	ROTHER ITE	MS	
TO: (Name, Title, Address (FILE NO. FILE TITLE	5-0024 (b)(7)	EDENTIEIER (E)
Alexand	ler Shu	gin		lexsunder	SHULGIN
			DATE 10/	27/94	
DIVISION / DISTRICT OFFI	CE	1		2	
SFFD					
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ā (P		owledge receipt of the following en into my custody by the above		r item(s),	
AMOUNT or QUANTITY	DES	SCRIPTION OF ITEM(S)		PURPOSE (If	Applicable)
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RECEIVED ((b)(7)(C),(b)(7)(F)		NAM (b)(7)(0	EAND TITLE (Print C),(b)(7)(F)	or Type)	8.8
WITNESS					
DEA Form					0/8-
DEA Form — 12 (Apr. 1983) — 12	. The state of the	Previous edition dated 9/77 ma	y be used until stock i	s exhausted.	

File ~

ZCZC00020 112145 R 112145Z JAN 96 FM DEA SAN FRANCISCO FIELD DIVISION TO DEA HQS WASHDC INFO ODD, ODO, AFD, CC BT

DEASENSITIVE 00020 ATTN: ODC, SPECIAL TESTING LABORATORY, OPR

SUBJECT: SURRENDER OF DEA REGISTRATION, PAYMENT OF \$25,000.00 FINE BY CHEMIST ALEXANDER SHULGIN

REF: R3/-93-2077, GDEP-(D)(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 SEED DIVERSION UNIT, DEA SEED CLAN LAB GROUP, ASSISTED BY DEA CHEMIST (D)(T)(C),(D)(T)(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 BOOK ABOUT LSD.

4. THE SAN FRANCISCO DIVISION WOULD LIKE TO ACKNOWLEDGE THE INVALUABLE CONTRIBUTION OF THE DEA SPECIAL TESTING LABORATORY AND THE FOLLOWING INDIVIDUALS, DEPUTY (b)(7)(C),(b)(7)(F) CHEMISTS (b)(7)(C),(b)(7)(F)

IN THE COMPLETION OF THIS INVESTIGATION.

5. ANY QUESTIONS ON THIS MATTER MAY BE REFERRED TO D/I (b)(7)(C),(b)(7)(F)

INDEXING SECTION:

ALEXANDER SHULGIN: NADDIS: 294983, 1904492

SFFD - 00020

SAC

(b)(7)(C),(b)(7)(F)

NNNN



Drug Enforcement Administration

123-95-0024

Washington, D.C. 20537

APR 1 4 1995

IN THE MATTER OF

Alexander Shulgin 1483 Shulgin Road Lafayette, California 94549

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, PS0061616, 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, PS0026206, 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 5. 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. activity was also in violation of California Health and Safety Code §§ 11401 and 11054-55. also failed to maintain any records documenting your manufacture of these substances.
 - On September 27, 1994, during an administrative b. 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 substances. You stated that your research 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. 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.

- c. 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.
- On September 27, 1994, during an administrative f. 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. 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 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 Furthermore, you had no DEA approval substances. 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, Washington, D.C. 20537.

Deputy Assistant Administrator Office of Diversion Control

cc: Hearing Clerk

Office of Administrative Law Judges

bcc:

Mr. (b)(7)(C),(b)(7)(F) OD ODO ODOC

DEA San Francisco Field Division

DRUG ENFORCEMENT ADMINISTRATION CLANDESTINE LABORATORY TASK FORCE OPERATION PLAN

Date: 10 27 94 Case R3-93-2071 G-DET (b)(7)(E) Pile Title: SHUGIU
NATURE OF OPERATION
Search Warrant: X Buy/Bust: Buy/Walk: Surveillance: Controlled Delivery:
Other: NOMINISTRATIVE INSPECTION
LOCATION
Address: 1483 SHULGIU RD City: LAFAYETTE
Directions: LAW 84 EAST, PLEASANT HILL PO EXIT > PROCESO NORTH
ROW SHULGIU BO
TIME OF OPERATION: 9000000000000000000000000000000000000
Supervisor: (b)(7)(C),(b)(7)(F)
OPERATIONAL SUMMARY
SFFD DNESSOU TO SERVE ADMINISTRATIVE INSPECTION WARRANT AT
LOCIATION. CONTRA COSTA DA TO SERVE MODITIONAL WARRANT.
LOCATION IS CONFIRMED SITE OF LABORATORY AND CHEMICAL
STORAGE
U/C AGENT #1
Name: Name: Name: Name: Sex:
Hgt: Wt: Hair: Eyes: Glases: Facial Hair:
Clothing:
Vehicle: Make: Model: Year: Color:
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COMMUNICATIONS		(
Primary Radio Channel:	4	
Verbal Arrest Signal: NA		
Visual Arrest Signal: No	1	
Emergency Signal: NA		
Time of Briefing: 8:00 Ay	<u>n</u>	
Location of Briefing: PARK	ING LOT - PLEASALT HILL	RD HILLVIEL LN
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Name of Watch Commander Noti	Time:	
Name of Task Force Commander	Time:	
Local Participation: YES	2	
LABORATORY PROCESSING/CLEAN-	UP	
Chemist(s): (b)(7)(C),(b)(7)(F)	- DEA SPECIAL TESTI	JG LAB.
Chem Waste Management Notifi	Time: 10 25 94-5001	
Site Safety Officer: (b)(7)(C),(b		
Lab Truck:		
Fire Dept. Notified:	D. FIRE DEPT	Time: (au scaus)
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ASSIGNMENTS		
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1.	(7)(F)	GIS
2.		UIDEO -ASSISTICHS
3.		SITE SAPETY - LUL'B'
4.		assist chemist
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REPORT ASSIGNMENTS			
Surveillance:	Arrest:	(7)(C),(b)(7)(F)	
Evidence:		(*)(C),(B)(*)(F)	
U/C:			
Nearest Hospital: DNU MUIR	HOSPITAL	<u> </u>	
Address: 1601 YGHC10 URU	GYRN LAWLT CREEK	C Phone: 510-939-3000	-
±			
AUSA Assigned:	· · · · · · · · · · · · · · · · · · ·	Phone:	
Operation Plan Approved:			
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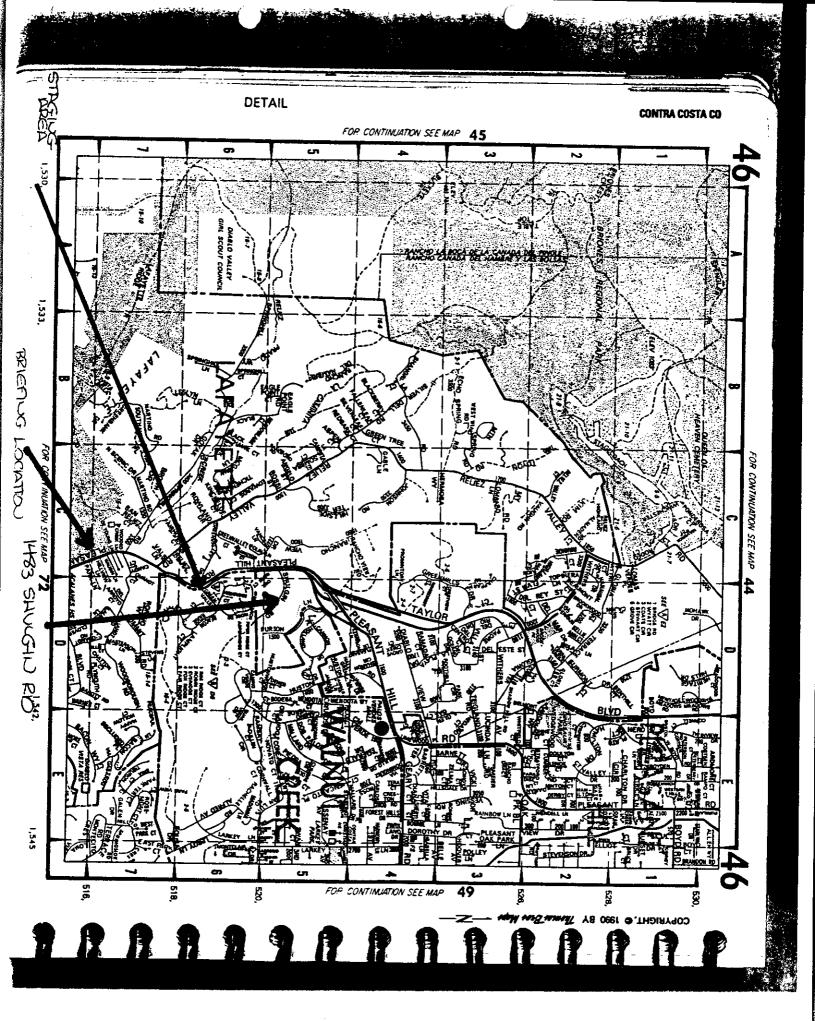
Diagrams/Maps Attached

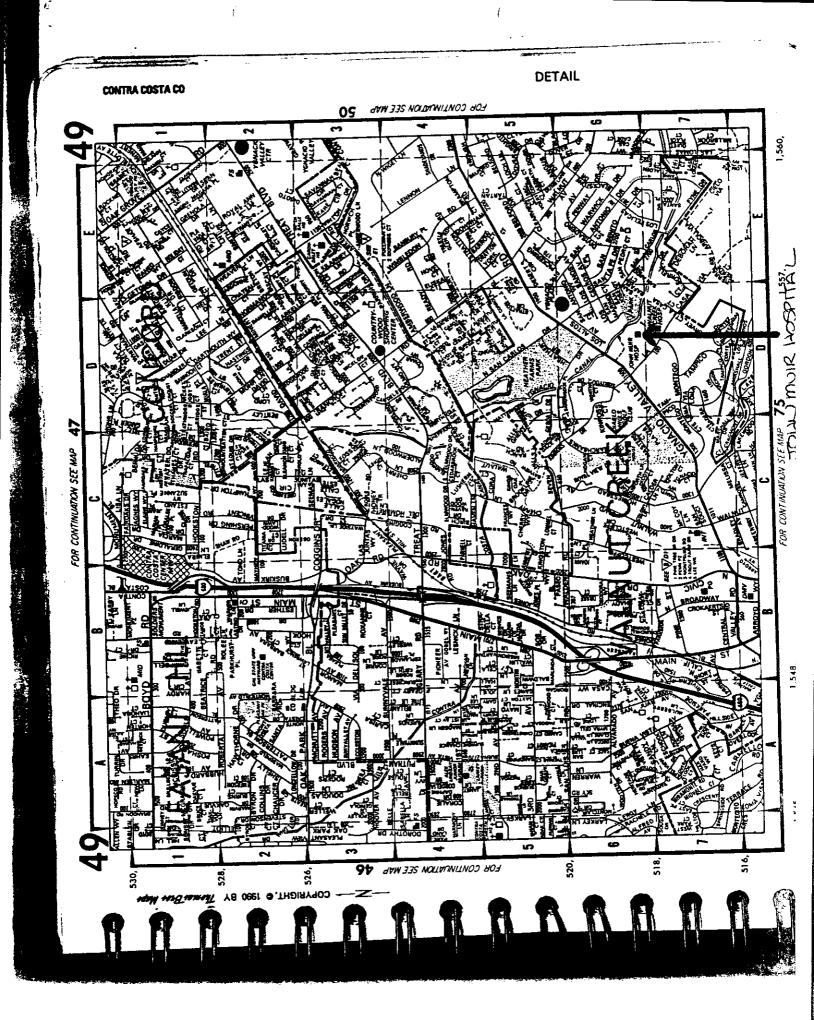
OU 9/27/94, AGENTS FROM SFFO EXECUTED AU
ADMINISTRATIVE INSPECTION UNREALT AT SHUGIUS RESIDENCE
LOCATED AT 1483 SHULGIN RD., LAFAYETE, WHILE INSPECTING
SHULGIUS LABORRATORY, A CEMPENT STRUCTURE LOCATED
BEHIND THE MAIN RESIDENCE, REGITS LOCATED A NUMBER
OF CHEMICALS, APPARATUS AND CONTROLLED SUBSTANCES. ALL
OF THESE MATERIALS SHOWN BE CONSIDERED HARARDOUS. IN
ADDITION THE CONFINED NATURE OF THE LABORRATORY AND
DETACHED STORAGE SHED ALSO CREATE A POTENTIALLY DANGEROUS
SITUATION.

THE INITIAL INSPECTION TEAM WILL SURVEY THE LOCATION IN ORDER TO IDENTIFY POTENTIAL HAZARDS. THIS TEAM WILL BE EQUIPPED WITH A GAS AR DETECTOR TO IDENTIFY POTENTIAL OXYGEN PROBLEMS IN AND PRODUCT THE LABORATORY. AN EMPRESSICY EMPOURITION TEAM OF AT LEAST TWO AGENTS WILL STAND BY IN LEVEL B' PROTECTION WHILE THE SITE INSPECTION IS IN PROGRESS. ONCE ALL POTENTIAL HAZARDS WAS BEEN IDENTIFIED. THE LABORATORY WILL BE SECURED AND PROCESSED AS A CRIME SCENE AS FER DEA ROLLY.

PATREMPTS LITL BE MADE TO STABILIZE THE LABORATION BEFORE ALL INDIVIDUALS ENTERTHE LOCATION TO PROCESS THE SCENCE. THESE EFFORTS MAY INCLUDE VENTUATION, STABILIZATION OF ONEOING CHEMICAL PERCITONS, ILLUMINATION, ETC. FIRE AND EMPRESANT MEDICAL RESISTANCE WILL BE ON SCENCE IN THE CASE OF EMERGENCE

DIEM ESSENTIAL PERSONNEL WILL BE ALLOWED TO ENTER THE LABORRADORY ONCE THE SCENE HAS BEEN SECURED. THOSE WHO ARE NEEDED WITH LABORATORY WILL BE INSTRUCTED SO BY THE





Page 37

R3-95-0024

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SEP 26 1994

RICHARD W. WIEKING CLERK, U.S. DISTRICT COURT RORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

NORTHERN DISTRICT OF CALIFORNIA

IN THE MATTER OF THE) ADMINISTRATIVE INSPECTION OF)	Magistrate's Docket No. 3.94.36514
ALEXANDER T. SHULGIN)	• •
ANALYTICAL LAB	AFFIDAVIT FOR ADMINISTRATIVE
DEA REGISTRATION PS0061616)	INSPECTION WARRANT
1483 SHULGIN ROAD)	
LAFAYETTE, CA 94549)	
ý)	

The undersigned, being duly sworn, deposes and says:

That the affiant, (b)(7)(C),(b)(7)(F) is a duly appointed

Diversion Investigator of the Drug Enforcement Administration,

United States Department of Justice, assigned to the San

Francisco Divisional Office.

Pursuant to Sections 878(2) and 880(b)(1), (2), and (3), Title 21, United States Code, and Section 3, Appendix to Subpart R, Title 28, Code of Federal Regulations, your affiant is authorized to execute administrative inspection warrants for the purpose of inspecting controlled premises of persons and firms registered under the Controlled Substances Act (21 U.S.C. 800 et seq.) in order to inspect, copy and verify the correctness of all 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.

Alexander Shulgin is registered under the provisions of the Controlled Substances Act, Title 21, United States Code, Section 823 et seq., as an Analytical Laboratory and has been assigned DEA registration number PS0061616 in Schedules I through V, and is doing business at his residence, 1483 Shulgin Rd., Lafayette, CA. That said place of business is a controlled premise within the meaning of Section 880(a), Title 21 United States Code and Section 1316.02(c), Title 21 Code of Federal Regulations.

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

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.

S

The DEA files also show that in 1971 Alexander Shulgin applied for and was granted a DEA Researcher registration authorizing him to handle Schedule I controlled substances at his 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
Researcher Registration based on the following. On February 8,
1977 the California Research Advisory Panel notified Dr. Shulgin
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

articles 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 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 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".

AFFIDAVIT

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 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.

Title 21 Section 880 defines probable cause for the issuance 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

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.

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

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

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

AFFIDAVIT

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. Drug Enforcement Administration Sworn to before me and subscribed in my presence on this 26 day of <u>Syd.</u>, 1994 AFFIDAVIT

STATE OF CALIFORNIA

WATE P O'BRIEN, J.O.

VIO A. BERMAN, PH D.
PRIEDE FASAL, M.D.
E. MCDERMOTT, JR.
LOGRICK MEYERS, M.D.
IMPORO B. ROSSITER, M.D.

OON J. DOW, PHARM.D. EXECUTIVE SECRETARY

15) 557-1325



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 Harijuana 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 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 I 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.

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

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, harvested 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?
- 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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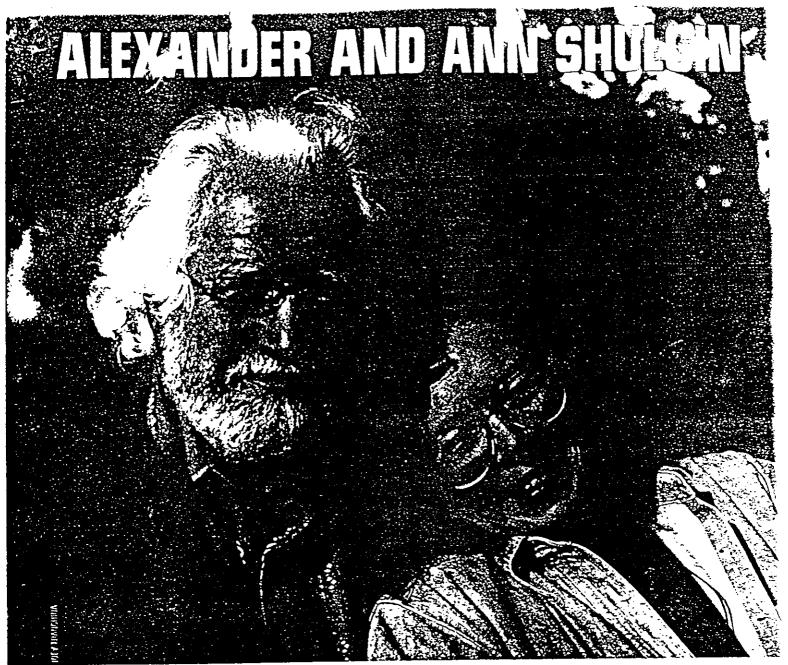
It is the Panel's policy that anyone can apply to the State to conduct specific research projects with Schedule I controlled substances and, moreover, that applicants who have had their approvals withdrawn can reapply. In addition to following the requirements and procedures of the Panel, should you 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 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 yours,
(b)(7)(C)
Chairman

Pharm.D.
Page 50

EPO 'B (b)(7)(C)



SASHA AND ANN SHULGIN ENJOY THE CALIFORNIA SUN.

DEWCHEDELC

Alexander Shulgin is a longstanding, well-respected UC Berkeley research chemist and professor of pharmacology. In his government-licensed 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 wife 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 psychotogical and spiritual potential. Most of Or. Shulgin's psychoactive designer molecules are unknown to the public, but a few, such as 208

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 Or. Shulgin has worked.

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

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 deep-seated fear is gone.

INROVATION

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.

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

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 fear 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 selfishnessit'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 serious problems, every society needs a wellthought-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 happen 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.

ITHINK

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 thy-

59

roid 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 abnormal!

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 there it appends the

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. *

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.

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Parties

This Agreement is entered into this ______ 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:

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. PS0061616 as an Analytical Laboratory; that pursuant to DEA Registration No. PS0061616, 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 seq.; 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

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 a 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. R3-93-2077." 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 Anne-Christine Massullo 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. PS0061616 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 controlled substances Shulgin has is his possession, custody or control which he had previously obtained with his DEA Registration No. PS0061616. Shulgin shall contact Investigator (b)(7)(C) 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 to come to his lab and he will explain and show Investigator how he disposed of any controlled substances which had been in his possession. Shulgin shall respond to all questions posed by Investigator (C),(b) about the disposition and circumstances of the disposition of said controlled substances and further provide Investigato (b)(7)(F) access to all records with refer, reflect or relate to the destruction of said controlled substances.

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

(b)(7)(C),(b) (7)(F) (b)(7)(C), (b)(7)(F)

cashier's check, all as more fully set forth in Paragraphs 1 to 4 above, Shulgin 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.

10. In Witness Whereof, the parties, through their duly authorized representatives, hereunder set their hands.

ON BEHALF OF THE UNITED STATES OF AMERICA

MICHAEL A. YAMAGUCHI

United States Attorney

A Northern District of California

Dated: אולנו ליו

ANNE-CHRISTINE MASSULLO

Assistant U.S. Atterney

(b)(7)(C)

Dated: 1/4/96

ALEXANDER T SHILLGIN MAT

1/8/96

Dated: 1/4/96

Attorney for Alexander T. Shulgin

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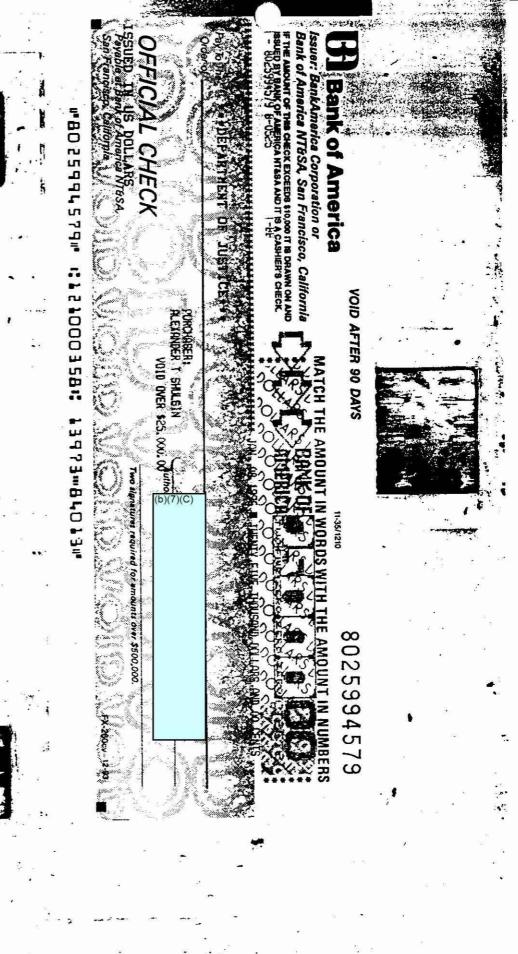
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I hereby voluntarily surrender my Drug Enforcement Administration Certificate of Registration, unused order forms, and all my controlled substances listed in schedule(s) 1,2,3,3N,4,5 as evidence of my agreement to relinquish my privilege to handle controlled substances listed in schedule(s) 1,2,3,3N,4,5 Further, I agree and consent that this document shall be authority for the Administrator of the Drug Enforcement Administration to terminate and revoke my registration without an order to show cause, a hearing, or any other proceedings, (and if not all controlled substances privileges are surrendered, be issued a new registration certificate limited to schedule(s) N/A

I waive refund of any payments made by me in connection with my registration.

I understand that I 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 I am again properly registered.

NAME OF REGISTRANT (Print)		ADDRESS OF REGISTRAN	
Alexander T. Shulgin	e e	1483 Shulgin Roa Lafeyette, CA 94	ad 1549
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49. REMARKS (Refer to Item No. when applicable)

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:	(b)(7)(E)	1

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 R3-93-2077, 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 294983, 1904492

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	tment of Justice or cement Administration	ı	REPOI	RT OF DRUG	PROPERTY	COLLEC	TED, PUI	RCHASED	OR SEIZED
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Page 4

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U.S. Department of Justice Drug Enforcement Administration

REPORT OF DRUG PROPERTY	COLLECTED	PURCHASED	OR SEIZED
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1. HOW OBTAINED (C	neck) Purchase	Seizure	Free Sa	ample	a. FILE NO.	2b. PRO	GRAM CODE 3.	G-DEP ID
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9. Exhibit No. (8 chara		DRUGS	12. MARKS (OR LABELS	(Describe fully)	APPROX. GRO	14. Submitted	15. Purchase Cost
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3271 . 17.9	The second	1 1	a glas	s vial	#22225	A STATE OF THE STA	1	0.0
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40	lluknown				contained	28.8glggt	28.8g gut	0.0
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m 11/01/94 the mailed to DEA Sp	above exhibits were properties and lesting be pecial lesting be	ih by D/	(b)(7)(C), (b)(7)(E)	11/03/	94.	THE CANT	ce to f/I(F) bits were th	r)(O),(b)(7)
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39 A1857	3.4-Methylened	lioxymeth	amphetami	ne phos	- 1	NUMBER OF STREET	9.	0918 gm
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34. ANALYST (Signatu	re)		21	5. TITLE	BFIT	1 1 3 V , 31 May 1	26 DATE COMPL	ETER
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(b)(7)(C)		The state of the s	38	3. TITLE	TE OHERTRE		39. LAB. LOCATIO	15
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DEA Form - 7 (Apr. 1990) - 7	Previo	ous edition dat	ed 10/87 is OB			. UNUSURE VALUE		

Read instructions on reverse before completing. U.S. Department of Justice REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED Drug Enforcement Administration 2b. PROGRAM CODE 2a. FILE NO. 1. HOW OBTAINED (Check) Free Sample Seizure Purchase Money Flashed Compliance Sample (Non-Criminal) Lab. Seizure (b)(7)(E)R3-93-2077 Other (Specify 48. WHERE OBTAINED (City, State/Country) 4b. DATE OBTAINED 5. FILE TITLE 6b. REFERRAL (b)(7)(C) 6a. RÉFERRING AGENCY (Name) GROUP NO. Case No. OR Seizure No. No. APPROX. GROSS QUANTITY 15. Purchase 9. Exhibit 10. FDIN ALLEGED DRUGS MARKS OR LABELS (Describe fully) Seized 14. Submitted Cost 13. No. (8 characters) White powder contained in 28.7a.awt 28.7g. gwt 35 Unk nown 0.0 glass vial #22222 36 White prystals contained 28.6a.awt 28.6g.awt Unknown in a glass vial #22216 0 White crystals contained 28.7g.gwt 37 Unknown 28.7g.qut in a glass vial \$22227 16. WAS ORIGINAL CONTAINER SUBMITTED SEPARATE FROM DRUG? NO (Included above) YES (If Yes, enter exhibit no. and describe original container fully) On 10/31/94 the above exhibits were surrendered by Dr. SHULGIN at his residence to D/I (F) On 11/01/94 the exhibits were processed by D/I (b)(7)(C),(b)(7)(F) The exhibits were then mailed to DEA Special Testing Lab by D/I (b)(7)(C), on 11/03/94. 17. SUBMITTED BY SPECIAL AGENT (Signature) 18. APPROVED BY (Signature & Title) (b)(7)(C),(b)(7)(F) b)(7)(C),(b)(7)(F) Investigato **LABORATORY EVIDENCE RECEIPT REPORT** 20. RECEIVED FROM (Signature & Date) 21. TITLE 19. No. PACKAGES 22. SEAL 24. TITLE Broken Unbroken LABORATURY ANALYSIS/COMPARISON REPORT 25. ANALYSIS SUMMARY AND REMARKS Tie fichzilis con rety Gross WT Lab # Net WT Gross WT after Analysis A1853 35 28.7 0.0369 28.7 gm 200 MAIL 31 0.0500 gm A1854 36 28.6 28.6 gm gm A1855 28.6 gm 37 0.1071 28.6 gm ti*11111 26. 28. WEIGHT PER UNIT ANALYZED 32. 33. ACTIVE DRUG INGREDIENT Exhibit Lab. (Established or Common Name) 31.5 CUnit 10 11 29. Strength 30. Measure No No TOTAL NET RESERVE 35 A1853 3,4-Methylenediczymethemphetamine NC1 n A315 cm 36 A1854 Mescaline HCl 0.0356 37 A1855 Mescaline HC1 0.1013 34. ANALYST (Signature) 35. TITLE 36. DATE COMPLETED

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(Apr. 1990)

37 APPROVED BY

Page 7

38. TITLE

Forensic Chemist

01/20/95

39. LAB. LOCATION

U.S. Departn	nent of Justice ment Administra	tion	REP	ORT OF	DRUG P	ROPERTY C	OLLECTE	o, PUF	RCHASED O	R SEIZED
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4a. WHERE	OBTAINED (Cit	y, State/Country)	4b. DATE C	BIAINED		not be to the contract			H eron ov	
bafavett	THE AGENCY (Nemal	SE HEFER	RAL, 199	4	(b)(7)(C)			4 A O A 1	NAME AND ADDRESS OF THE OWNER, WHEN PERSON
			Core No	. OR Seiz				GF	ROUP NO.	
2 + 13	e in the second of	5 Jun 41 Same 11	No			November	111994	10	SQUANTITY	OlD_
9. Exhibit 1	0. FDIN		551166	12. MARKS	ORIABEL	S (Describe fully	1		14. Submitted	T5. Purchase Cost
No.	(8 characters)	ALLEGED	DRUGS				10. 00.00		and the second	1
32		Unknown		White p	owder_c	ontained i	n 28.59	gut	28.5g.gwt	0
w/	1 - 1 - 1	The state of the s		a glass	vial #	22224	20		1, 8, 11	
						ina naudaa	28.50	aut	28.5g.gwt	- 0
33		Unknown		White p	bystati	ine powder	11-4	A STATE OF	33 × X	
35.5	0-15 C 5 1	A SUBSTINE ASSESSMENT	024	in a gi	ABB VIO	A Blakeholad			Ser S. Charles and	0
				White	nudben) i	ine powder	28.80	_qut	28.8g.gwl	
34	3 + 2 EV.	Unknown	złaci;	in a cl	ass via	1 #22215		-	Fm 1.2 Store	0
		.90 0	151		1 - 1				\$ - A)34 (17)	
16. WAS OF	RIGINAL CONTA	AINER SUBMITTED	SEPARATE F	ROM DRUG	NO	(Included above	YES (If Yes, e	nter exhibit no. a container fully)	and describe
		1	1							/L\/7\/0\ /L\/7\
REMARKS	1/0/	bove exhibit	e ware sur	rendere	d by Dr	. SHULGIN	at his re	siden	ce to D/I	(b)(7)(C),(b)(7) (F)
On 11/0	1/94 the a	xhibits were	processe	by D/I	(b)(7)(C),(b)(7	')(F)	The	exhi	bits were	then
mailed	to DEA Sne	cial Testing	Lab by D	(b)(7)(C),	on 11/	03/94.	1		p. 1	
ESCHALL COM	co pan ope			(D)(7)(F)	1519/2 1 57				near 1 August	
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U37 107 C	5. 18. 25.10	AL AGENT (Signatu	(50)		18. APP	ROVED BY (Sign	nature & Title)		1. **	114
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(6)(1)(0),(6)(1)	1	's post fildus ici va s	LABORAT	ORY EVID			Group Su	heria	BOL THER	er Lina
19. No. PA	CKAGES 20	. RECEIVED FROM	(Signature & Da	ate)	11	21.	TITLE		91	
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25. ANAL	YSIS SUMMARY	AND REMARKS	LAHLL	Y		the second		- 4	77 are a care 51	7 (65
Lab #	to, nor virgina	chibit Aschiev	Gross W	K	Net W	To the state of the	Gross	WT at	fter Analy	sis
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			Alexander	11.47 2 4.44	<u> </u>		V. II.	4	OR DESCRIPTION DE	33.
26. Exhibit	27. Lab. 20	8. ACTIVE DE	RUG INGREDIE	NT , and	7 7 7 7 1	SHT PER UNIT A	2000 00000		32.	
No.	No.		or Common Na		29. Streng			iit ii	TOTAL NET	RESERVE
-32	A1850	3,4-Methyler	nedioxymet	hamphet	mine R	CALLIO OLLAN	ne tr	6.7115	ME SOUL IS CHOOSE	0.0910
-33	A1851	Mescaline H	01		1, 1, 1, 1, 1, 1, 1		**************************************		ARREST MARKET FOR	0.1300
-34	A1852	Mescaline 3	ulfate				WEB 10.		\$1118) L3 - C 100	000710
	+ +			A CONTRACTOR OF THE CONTRACTOR			9161 110	* D	Of treatile ordina	
-						Take Y	16.1 m/s. 1 %	1 19 561	bir-nesigns w	Δ.
34. ANAL	YST (Signature)		1	a national and a second	35. TITLE			- lin.	36. DATE COM	
(b)(7)(C)		The state of the s	<i>t</i>	ri -		msic Chem	lst	ToMil	01/17/	
37. /(b)(7)((C)		1 000	1.1	38. TITLE				39. LAB. LOCA	
(-/\-/\)					Lab	oratory Di	rector	3	McLean.	VA

DEA Form - 7 (Apr. 1990) - 7

	rtment of Just rcement Admi		D-		RE	PORT O	F DRUG F	ROP	ERTY	COI	LLECTED,	PURCHASE	D OR	SEIZED
1. HOW O	BTAINED (CI		Purcha		Seizure	-	ee Sample	2a. F	ILE NO.		2b.	PROGRAM COD	E 3. G	DEP ID
	Seizure [r (Specify	Money	Flashed 🔲	Comp	liance Samp	le (Non-Cri	minal)	R3-	-93-20	77	ı ê		(b)(7)(E	<u> </u>
4a. WHEF	RE OBTAINE	chy, st	ate/Country)		4b. DATE	OBTAINE)	5. FI	LE TITL	E	161 E _E 47		Try 1	
infayet	RRING AGEN	ICY (Nam	e)		6b. REFE	BEAL'	194	(b)(7)(C)		* \$4.0 1.7%			
	94					o. OR s	eizure No.	(0)(1)(. 196 2	6) - P	12.1	8. GROUP NO.		at the control of the
9. Exhibit	10. FDI		11. ALLEG	ED D	No	12. MAR	KS OR LABE	1.0	scribe full		APPROX. G	ROSS QUANTI		5. Purchase Cost
No. 29	(8 chara	cters)				Pink	powder c	onta	ined S	10	29.0g.g	0.1		1
ad r		332	Unknown	12.			ss vial					100 104	-	0.
30			Unknown			Tan c	owder co	ntai	ned i	n	28.5a.a	wt. 28.5a.	awt.	0.
	- H 16 10	ex. 1 11/2	In 10 T				ss vial			f) H	- 6-1) · ·	71 11 112		0.
31		e server	Unknows	2" > 5:			powder as vial			in	_28.3g.g	put 28.3g	gut	0.
16 WAS (ORIGINAL CO	NTAINE	R SLIBMITTE	D SE	PARATEE				uded abov	(a)	NES (If V	es, enter exhibit	no and	describe
REMARK On 10/3 On 11/0 mailed 17. SUBM	S: 31/94 the 31/94 the to DEA S	above exhib pecial	exhibit its were Testing	pr La	ere sur ocessed b by 0/	rendere by D/I 1 (b)(7)(C), (b)(7)(F)	d by Dr. (b)(7)(C),(b)(7) on 11/0 18. APPI (b)(7)(C),(b)	SHU (F) 3/94 ROVEI	DBY (Su	at I	orig	lence to D	(1 (b)(7)	(C),(b)(7)(F)
	ACKAGES	20. REC	EIVED FROM				DENUE NEU	EIFT	A CONTRACTOR	TITL	The state of the s	10.	913 - 14	
	3 1275	194	602	91	1 5	39	11/7/19	X	(e.fg	10		17 - 17 - 17	120 (30)	2
Broken	Unbroken	(b)(7)(C)					ET	TO 30	24.	TITLI 59	E (1) 1 (4) (4) (4) (3) (4) (4) (4)		.h.amne.i	
-	7		m	LAD	UNATUR	TANALY	SIS/COMPA	RISO	N REPO	NAME AND ADDRESS OF		7 1 1 1 N 31 41	7 7 3 30	
Lab #	YSIS SUMMA	Exhib:	arthrod	-,1 r	Gross	WT	Nei	WE	0 W 9 * 0		Gros	s WT after	Anal	ysis
A1847	er de	29	.95 JA	W 3 I	29.0	gm	0.0	071	gm	1/100	naketa siri isa	29.0 g	m.v.	
A1848	4	30	1000 291 (10)	1/20	28.5 g	m	0.0)412	gm			28.5 g	оро но 1 Л (8)	
A1849		31			28.3 8	m	0.0	183	gm		on Sun	28.3 de la companya d	m _o ,	
26. Exhibit	27.	28.	ACTIVE DI	RUGI	NGREDIEN	NT a service	WEIGI	IT PE	RUNITA	NAL	Ladia R = 1 1	32.	33.	
No.	No.		(Established	or Co	ommon Nan	ne)	29. Strength	30	D. Measure	е	31. Unit	TOTAL NET	ner R	ESERVE
- 29 - 30	A1847 A1848		o ntrolle s -isoapi		ibstance	ss dete	cted	3	TAN	91	- 16 c	OF SAME OF	0.	0014 gr
31	A1849		_		bromopl	enethy	lamine N	21				at the second of	0.	0135 gn
											ात स्वता १५ ह			
	YST (Signatur	e)					35. TITLE		1		\$11126	36, DATE CO		ED
(b)(7)(C)						Production of	38. TITLE	sic	Chemi	st	LIAM	39. LAB. LO	20/35 ASIYAS	oy.
DEA Form	. – 7							eato:	ry Dir	oct	OP 90 0	McLe	an V	Δ
(Apr. 1990)) – /		Pro	evious	edition date	ed 10/87 is	OBSOLETE.							

Read instructions on reverse before completing. U.S. Department of Justice REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED Drug Enforcement Administration 2b. PROGRAM CODE 3. G-DEP ID 2a. FILE NO. 1. HOW OBTAINED (Check) Free Sample Seizure Purchase Lab. Seizure Money Flashed Compliance Sample (Non-Criminal) (b)(7)(E)R3-93-2077 Other (Specify Surrendered 4a. WHERE OBTAINED (City, State/Country) 46. DATE OBTAINED 5. FILE TITLE October 31 1994 Lafavette. (b)(7)(C) 6b. REFERRAL 6a. REFERRING AGENCY (Name) 8. GROUP NO. 7. DATE PREPARED Case No. OR Seizure No. Uovember 1994 10 - Diversion APPROX. GROSS QUANTITY 15. Purchase 9. Exhibit 10. FDIN ALLEGED DRUGS MARKS OR LABELS (Describe fully) 13. Seized 14. Submitted Cost No. (8 characters) 26 White powder contained in 28.70. awt 28.7a.awt Unknown 0. a glass vial #22213 27 White powder contained in 29.1g.qwt 29.1q.qwt Unknown a dlass vial #22210 0 29.2a.awt 0.0 28 Tan powder contained 29.2a.awt Unknow a glass vial #22220 16. WAS ORIGINAL CONTAINER SUBMITTED SEPARATE FROM DRUG? NO (Included above) YES (If Yes, enter exhibit no. and describe original container fully) On 10/31/94 the above exhibits were surrendered by Dr. SHULGIN at his residence to D/I On 11/01/94 the exhibits were processed by D/I (b)(7)(C),(b)(7)(F) The exhibits were then mailed to DEA Special Testing Lab by D/I (b)(7)(C), on 11/03/94. 17. SUBMITTED BY SPECIAL AGENT (Signature) 18. APPROVED BY (Signature & Title) (b)(7)(C),(b)(7)(F)(b)(7)(C),(b)(7)(F)Investigator Grana Sunaryi LABORATORY EVIDENCE RECEIPT REPORT 19. No. PACKAGES 20. RECEIVED FROM (Signature & Date) 21. TITLE 22. SEAL 24. TITLE Broken Unbroken LABORATOR : ANALYSIS/COMPARISON REPOR 25. ANALYSIS SUMMARY AND REMARKS Lab # Exhibit A Gross WT Net WT Gross WT after Analysis 0.0448 gm A1844 26 29.41 29.4 gm 29.33 gm 0.0290 gm A1845 27 29.4 gm 0.1051 86 A1846 28 29.65 gm 29.3 gm

26. Exhibit	27. Lab.	28. ACTIVE DRUGINGREDIENT	WEIGHT	PER UNIT ANAI	32.	33.	
No.	No.	(Established or Common Name)	29. Strength	30. Measure	31:2" Unit	TOTAL NET	RESERVE
A1844	26	Mescaline Sulfate woffer sur many	drw "		Translation screens a	1705 * 1 6	0.0338
_A1845	27	2.5-Dimethoxy-4-bromophenethy	lamine HCl	F 000 - 140715 - 151 1	A CONTRACTOR	7 × 10	0.0186
A1846	28	3.4-Methylenediczymethamphetes	ine HCl		18 71 11 11	-16-7	0.0966 8
					Jangon, some	(7) angri angra	
***************************************				graph may be made a	tail o " - cyc.s	ob Instituto,	
34. ANALY (b)(7)(C)	/ST (Signatur	re)	35. TITLE		ji ani	36. DATE COM	PLETED
3		and the same and t	Forensic	Chemist	· MLM AMAC	1000	
٦			38. TITLE		39. LAB. LOCATION		
DEA Form			Laborate	N. Directo			

Previous edition dated 10/87 is OBSOLETE.

(Apr. 1990)

	rtment of Justice rcement Administration	on .	RE	PORT OF DRU	G PROPE	RTYCC	LLECTE), PU	RCHASED O	R SEIZED
1. HOW O	BTAINED (Check)	Purchase	Seizure	Free Sample	2a. FIL	E NO.	26	. PRO	GRAM CODE 3.	G-DEP ID
☐ Lab.	Seizure Money	y Flashed Com			5.	3-2077			(b)(⁷	7)(E)
	- /Consify	rendered			100	2000		1		
4a. WHER	RE OBTAINED (City,		4b. DATE	OBTAINED	5. FILE	TITLE		- 7	तेश करू ४	
Lafayet	te, CA	915	October	31, 1994		To the State of	Joan I. In			
6a. REFE	RRING AGENCY (Na	me)	6b. REFER		(b)(7)(C)			Jo o	COLDAIG .	
Sk.	Lander of the A			o. OR Seizure No.		PREPAR	1994	1	- Diversio	77
	140	11.	No	12.	_ nove	aber 1		-	S QUANTITY	15. Purchase
9. Exhibit No.	10. FDIN (8 characters)	ALLEGED	DRUGS	MARKS OR LA	ABELS (Descr	ibe fully)	13. Seized		14. Submitted	Cost
23		Unknown		Tan powder	containe	dina	29.30	cost	29 30 out	0.
nd -	greene anno de		1 1	glass vial				3	vising i muli	
			: ^	2	74					0.
24		Unknown		Brown liqui		ned_in	29.19.	gwt.	29.1g.gwt.	0.
-37	ren essa as as see	μF 35 Y	13 9d 17 3	glass vial	#22211	ver ret			***	U.
26		Unknown		em. f.			20. 2	10	20. 2	0
25	i englisher e i	Ser San Ser	1 20 1	White powde	c contai	nec 1n	49.3g.	gwc.	29.39.9WC.	0.
Service P.	, 36°-10	The state of the s					. 467		A L L I TELL TYS	
16. WAS 0	ORIGINAL CONTAIN	ER SUBMITTED S	EPARATE F	ROM DRUG ?	NO (Include	ed above)	YES (If	Yes, e	enter exhibit no. ar container fully)	nd describe
REMARK	S:								and the state of t)(7)(C),(b)(7)(F)
On 10/3	S: 31/94 the above	ve exhibits	were sur	rendered by	Dr. SHUL	GIN at	his res	iden	ce to D/1	L
On 11/0	01/94 the exhi	ibits were p	rocessed	by 0/1 (b)(7)(C)	1/03/94.		· ine	LEUL	bits were t	Hell
mailed	to DEA Specia	al lesting L	ab by DA	(b)(7)(F)	1/03/24.					
	5.00		1							
200.0	modern despess	414, 11 114					,			
17. SUBM	ITTED BY SPECIAL				APPROVED E (C),(b)(7)(F)				OF THE PARTY OF TH	3
(b)(7)(C),(b)(7	Live	stigator	ADODAT	2000	27 (27) 27 (27)	THE REAL PROPERTY.	roup Sup	ervi	SOI	The same of the sa
		CEIVED FROM (S		ORY EVIDENCE	RECEIPT K	21. TIT	T E		40 and 4	400
19. NO. F7	TAR WISH MAN	A Propresion	PLU	Secretary of the second	Alon	/	1.00	53	na travesti madi	
22. SEAL	3(b)(7)((C)	67	11/11/	1177	24. TIT	LE		SHI MILL A DE PER	LIR64
Broken	Unbroken (b)(7)(0.71.	19 3 436 lo	V000 014	Jenoral Areg	H. L.	to hear the re-	209
	*		Partie William Commence Commence	rs/soi	MPARISON	REPOR'	ويسميدا	HU M	EVIDENCE NUTL	40.4
25. ANAL	YSIS SUMMARY AN	DREMARKS	1.4 K 12.192.1	at 1 25 II.	1-01-1	ve'	14 2010 74	9 32	churr own an right	j.
Lab	# Exhibit	Stron 4 HG to Gros	S WT	Net WT	147-00-186-1	14 nc of	ross WT	afte	r Analysis	
Special property of the said		-	47	0.3807 gm		7		29.5	30% A 90 6 01 910 PT	2
A184	7 43 6 A.	5 July 5	47 gm	0.300X 88	er at	10		2702	. E	
A184	2 24	29	17 gm	0.004 @m	(estima	ted		29.3	gm	
			1		the me is a	/	Mans in a s	151015	(a) 1/2 kingram I (b) 50,000 tosage	
A184	3 25	29.	58 gm	0.4278 gm				29.5	opening (1)	
			-				96. u		e) 50 kilograms	
26.	27. 28.	YE	1 DEMOD [00. 20. 01 T 1650 W	FIGHT BED I	INIT AND	L VZED	1	igi lay comb.	
Exhibit	The state of the s	ACTIVE DRUG (Established or		A S C In little Companies	EIGHT PER I	Measure 2	100	450	32. 33	
No.	No.		Common IVan	29. 3(16	angth 30.1	AMAG	31. Unit		TOTALENET	RESERVE
23		caline HCl	2001 (10)	2 0312 0310 13 11 22	make \$10.		41672			3.3791 gr
25		"Unethoxy"	4-bromop	henethylamin	(08	111 101	n not de	COL	amenen)	0.4171 er
2.3	A1043 354	and the state of	un juic tra				3167 7,100	h. 26 3 =	1 2000 1 91910/110	*****
							\$1 1 XZ		Vortice teas 10	
34 45141	YST (Signature)			05.5	15	191	E profile	61	TATE OF BEING	
	. i o i (oignature)	-		35. TIT		-		bail i	36. DATE COMPL	ETED
3 (b)(7)(C)				38. TIT	ensic Ch	emist	L. Maria		01/12/95	ON.
						3	39. LAB. LOCATION			
D	" - 7	Provio	us edition da	ted 10/87 is OBSOLE	eratery.	War cot	or and an		-McLean Vi	reinia
(Apr. 1990	0)		Julion da	Page 1					5 - Hdq	trs. File
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U.S. Department of Justice

U.S. Depar	rtment of Just reement Admi	tice j	4	, BE	PORT O	F DRUG P	ROPERT	Y CO	LECTED, P	URCHASED	OR SEIZED
							2a. FILE N	NISH WALLS		OGRAM CODE	
_	BTAINED (Ch		Purchase	Seizure		e Sample	Za. FILE I	NO.			
Lab.	Seizure L r (Specify		Flashed Com	pliance Samp	ie (Non-Crir	ninai)	R3-93-	-2077		. स.च्या बुल्हे गा	(b)(7)(E)
4a. WHER	E OBTAINED	(City, St	endered ate/Country)	4b. DATE	OBTAINED)	5. FILE TI			nem, tor	3 3 30
Lafaye	tte, CA		· ·	Octobe	r 31, 1	994		3577 1 -	. b. (C. *)		
	RRING AGEN			6b. REFE	RRAL: o. OR□s	olauro No	(b)(7)(C) 7. DATE P	REPARE	D [8.	GROUP NO.	r<
	e towards part			No.	o. UKUS	BIZUTE NO.	Novemb	10 - Diver	sion		
9. Exhibit	10. FDII	N 7	11. ALLEGED	a a granger	12.	S OR LABEL	-c - F		OSS QUANTITY	1 di ciido	
No.	(8 charac		ALLEGED						13. Seized	14. Submitte	
20	e engrisi e e	21 71 1 2	Hinknown	No.	THE RESERVE TO SHARE THE PARTY OF THE PARTY	powder covial #22		o in	28./g.qwc	. 28.79.9	WE.
	1 2 de 120			The state of the s	92000	V SOLL BENG			70. 110		Ω.
21			Unknown					in a	29.0g.gwt	. 29.0g.g	jwt.
2 1 4	Marie en e			C	quass	viai #22	218	441	W. H. S	1	0-
22		<u> </u>			Tan oc	uder con	tained	ina	29.2g.gwt	. 29.2q.d	wt. O.
E. G.	ar olympia ora s	* v.1	linknown	Bi si ser		vial #DE			- arraying	9-181 97	
											1 + 4
16. WAS (ORIGINAL CO	NTAINE	R SUBMITTED S	EPARATE F	ROM DRUG	? UNO	(Included a	above)		, enter exhibit no al container fully	
REMARK	S:	-1				and have flow				ones to 157	(b)(7)(C),(b)(7)(F)
On 10/	31/94 th	e abov	e exhibits bits were p	were su	rrenaer	(b)(7)(C),(b)(7)(F)	in at	The ex	hibits wer	1 (b)(7)(C),(b)(7)(F)
mailed	to DEA	Specia	1 Testing	Lab by D	[] [(b)(1)(C)	on 11/0	03/94.	e •)			
				Printer	(b)(7)(F)						1 12 40
								Fo	5.		
	indyj) - yd y kryd	Ver ex	j hor analization of	Across the part	6.1 - 10 10			(a , y) (B)	rags , s		
17. SUBM	ITTED BY SP	ECIAL A	GENT (Signature)				OVED BY	1	a transfer	14)	
(b)(7)(C),(b)(tarialso he	The second second	Ligator no	NARORAT	OBV EVI	(b)(7)(C),(b		OPT	roup Super	visor 6	
	ACKAGES	20. REC	EIVED FROM (S			JENDE HEO	-	21. TITL	.E	the state of the	
ş1	of the stephens	P	111.119	9/3000	739	11/7	1911		lov	iden in take	b sinos
22. SEAL	Unbroken.	23(b)(7)(0	0)	re & Date)		100 James	1/ 2	24. TITL	Ε.,		78.1
Broken	Unbroken .	1.84		1 10 mm 1 1	YANALY	SIS/COMPA	RISON RE	PORT		u d (
25. ANAL	YSIS SUMMA	RY AND	REMARKS	FIE GSZEF	- 1 N T N	116	1	,		1 3/31	/15eF
Y addition	omation of the second	Exhi	sent James Free	Gross	err :	Net 1	119	1 1 1 1 1	Gross W	after Anal	
Letto	W	DAILE	E S. E.	120000	7		pr. day		Commission of the last of the	anodal - 30 s or s	Giner
A183	B Burner Here	20	e til fon bit he	30,44	SUP THE	0.140	(1) sm		30.7		
	_		195 2 Bu	HAR MI Panax	reliante de la	1 4 405 Je / Mg	The River	/	re e estrolla		4 0-4
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22.20	•			WINE SPECIAL	JOHNSLIE I	T V/ I (Napara Napara	Tarritat	of kilogran	*
26. Exhibit	27. Lab.	28.	ACTIVE DRUG	INGREDIE	NT	WEIGH	T PER UŅI	T ANAL	YZED	32.	33.
No.	No.		(Established or	Common Nar	me)	29. Strength	30. Mea		31. Unit	TOTAL NET	RESERVE
20	A1838		aline Sulfe		, s is settled.	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	TION OF	AMAON	1100	37 11. 11. 1511	0.1186 gm
21	A1839		methylened:				Tal lar	VI- V 911	3 / 1 M A)	I I WE BOAMI. **	0.0355 gm
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34. ANAL	YST (Signatur	e)				35. TITLE		110		36. DATE COM	MPLETED
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3					- Allert - A	38. TITLE	- West	- Special Spec		39. LAB. LOCA	4 6 4 10
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Page 12

U.S. Depar Drug Enfor	rtment of Just rement Admi	tice _ nistration	***	RE	PORT O	F DRUG	PRO	PERTY	co				OR SEIZED
1. HOW OI	BTAINED (C	neck)	Purchas	e Seizure	□ Fre	ee Sample	2a.	FILE NO		2	b. PRO	GRAM CODE	3. G-DEP ID
Lab. S	Seizure [Money F		Compliance Samp	7.7	minal)	R	3-93-2	077				(b)(7)(E)
	E OBTAINED		endered	Ab DATE	OBTAINED)	5.	FILE TITL	LE			p 1 (4) 1	
		City, St	ste/Country/		r 31. 1								
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				Case N	o. OR s	eizure No.	7. [DATE PRE	PARI	ED	8. G	ROUP NO.	į Ig
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Read instructions on reverse before completing.

U.S. Department of Justice

L22362

Drug Enfor	rcement Adm	inistration		RE	PORTO	F DRUG F	ROPI	ERIYCO	LLECI	ED, PO	RUNASED	OR SEIZED	
1. HOW O	BTAINED (C	neck)	Purchase	Seizure	□ Fr	ree Sample	2a. FILE NO. 2			2b. PRO	2b. PROGRAM CODE 3. G-DEP ID		
Lab.	Seizure [Flashed Com				R3-	93-2077		12 16	and Min	(b)(7)(E)	
7	E OBTAINE		NDERED ate/Country)	4b. DATE	OBTAINE	D	5. FIL	ETITLE	1819		1 3 14 1 10°		
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9. Exhibit No.	10. FDI (8 chara		ALLEGED	DRUGS	12. MAR	KS OR LABE	LS (Des	cribe fully)	13. Sei		S QUANTITY	d Purchase	
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		and the second section of the section of the second section of the sect										S ×	
16. WAS C	RIGINAL CO	NTAINE	SUBMITTEDS	EPARATE F	ROM DRUG	G ? - 1 NO) (Inclu	ded above)	YES	S (If Yes, e	nter exhibit no	, and describe	
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26.	27.	28.	ACTIVE DRUG			-	T PER	UNIT ANA	LYZED	3	32.	33.	
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16b		3.4-M	ethylenedi	oxyamphe oxymethe	moheta	inci	. 700	LUDOL /IBU	r. acti	TUND BYOUT A	AMIL SUCHAM	0.1734 8	
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U.S. Department of Drug Enforcement	of Justice Administration	ж :	REI	PORT O	F DRUG P	ROPER	RTY CO	LLECT	ED, PU	RCHASED	OR SEIZED
1. HOW OBTAINE	D (Check)	Purchase	Seizure	□ Fre	ee Sample	2a. FIL	E NO.		2b. PRO	GRAM CODE	3. G-DEP ID
Lab. Seizure		Flashed Cor	Contract		4 4	R3-93	-2077	Y	4,5 M A	e in a more	(b)(7)(E)
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ence of the pr		- N/A (1) 2 V	Case No	7	eizure No.	7. DATE	PREPAR	RED	8. G	ROUP NO.	
	4		No			Octob	er 28	, 1994	10	- DIVERS	ION
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16. WAS ORIGINA	L CONTAINE	RSUBMITTED	SEPARATE F	OM DRUG	I NO	(Include	d above)	YES	(If Yes, e	nter exhibit no	, and describe
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ON SEPTEMBER											
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Drug Enforcement			RE	PORT OF	DRUG PR	ROPERTY	COL	LLECT		RCHASED		
1. HOW OBTAIN	ED (Check)	Purchase	Seizure	Free	e Sample	2a. FILE NO	D.		2b. PROG	GRAM CODE 3.	G-DEP ID	
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4a. WHERE OBT	SHER	ENDERED ate/Country)	4b. DATE	OBTAINED		5. FILE TIT	LE	13		2 8 B 1 1974	Α	
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All to the last	, e ₁	Sagrana de Mario de Sa	Case No	o. OR Se	izure No.	7. DATE PR				GROUP NO.		
			No	L		October	28,	1994	The second secon	10 - DIVERSION ROSS QUANTITY 15. Purchs		
9. Exhibit 10.	FDIN 3 characters)	11. ALLEGED D	RUGS	12. MARK	S OR LABEL	S (Describe f	ully)	13. Seized		14. Submitted	Cost	
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							d and the control of					
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16. WAS ORIGIN	NAL CONTAINE	R SUBMITTED SE	PARATE F	ROM DRUG	? \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	(Included at	oove)	YES	(If Yes, e	nter exhibit no. a container fully)	and describe	
A Sharesa	BY SPECIAL A INVES	GENT (Signatu (b) STIGATOR CEIVED FROM (Si	PINGERY (7)(C),(b)(7)(F)	ORY EVIL	EQUESTED)	OVED BY (SO)(7)(F)	Signatu	re & Title		of theme	G G	
3	Al	for dot of	3377	3774	11171	X9 3				5-1 11	33.2	
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25. ANALYSIS	SUMMARY AND	REMARKS						la V Fuel	2 2 2 2 2 2	21 11 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	1 6 2	
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26. 27.	28.			C. C. WELL	WEIGH	T PER UNI	TANA	LYZED	ar Lucian	32.	33.	
Exhibit	ab. and wo	ACTIVE DRUG (Established or	1.0	400 K X X 101	29. Strength	11 12 1 1 0 1 1 1 1 1 1 1 1 1 1 1 1 1 1	STOCKE U.	33.63	, / () * 1	TOTAL NET	RESERVE	
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	A1830 2,4-	Methylened:	oxymeth	ampheta	ine HC1		3 70		1. 1 1 1 6 1 1	rice and in mislion	0.169 gm	
34. ANALYST (Signature)	`\			35. TITLE		-,		1.00	36. DATE COMP	LETED	
(b)(7)(C)					FORENS	IC CHEM	ST	1	HI TRACE	12/30/9	4	
3				a. m	38. TITLE				39. LAB. LOCATION			
					LABORAT	ORY DIRE	ECTOR		and the party	MCLEAN	VA	
DEA Form (Apr. 1990)	7	Previo	us edition da		OBSOLETE.				110 (25)	5 - He	datrs. File	

Previous edition dated 10/87 is OBSOLETE. Page 16

Read instructions on reverse before completing. U.S. Department of Justice REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED Drug Enforcement Administration 2b. PROGRAM CODE 3. G-DEP ID 2a. FILE NO. 1. HOW OBTAINED (Check) Purchase Seizure Free Sample Money Flashed Compliance Sample (Non-Criminal) Lab. Seizure R3-92-2077 (b)(7)(E)N/A Other (Specify 4a. WHERE OBTAINED (City, State/Country) 5. FILE TITLE 4b. DATE OBTAINED (b)(7)(C) 3ct ober 27 1994 Lafavette. 6a. RÉFERRING AGENCY (Name) 6b. REFERRAL B. GROUP NO. 7. DATE PREPARED Case No. OR Seizure No. 1994 Actoher 28 15. Purchase APPROX. GROSS QUANTITY 9. Exhibit 10. FDIN ALLEGED DRUGS MARKS OR LABELS (Describe fully) 13. Seized 14. Submitted Cost No. (8 characters) Amber Liquid 45 5 Unknown White Powder Unknown White Powder linknown 45 8 DO 16. WAS ORIGINAL CONTAINER SUBMITTED SEPARATE FROM DRUG? YES (If Yes, enter exhibit no. and describe NO (Included above) original container fully) On October 27, 1994, the above exhibits were seized by TFA (7)(F) pursuant to a Federal Administrative Inspection Warrant at 1483 Shulgin Drive, Lafayette, CA. TFA $\frac{(b)(7)(C),(b)}{(7)(C)}$ transported the exhibits to SFFD where it was processed as evidence as witenessed by S/A $\frac{(b)(7)(C),(b)(7)}{(F)}$ The exhibits were later mailed to DEA Special Testing Research Laboratory, 7704 file Springhouse Road, McLean, Virginia, for analysis. (b)(7)(C),(b)(7)(F) 17. SUBMITTED BY SPECIAL AGENT (Signature) 94, 37 LABORATORY EVIDENCE BÉCEIPT REPORT 19. No. PACKAGES 20/ RECEIVED FROM (Signature & Date) 21. TITLE 22. SEAL 24. TITLE Broken Unbroken LABORATORY ANALYSIS/COMPARISON REPORT 25. ANALYSIS SUMMARY AND REMARKS Gross WT after Analysis Net WT Lab# Exhibit Gross WT 44.6 gm 1.875 gm A1825 7 45.8 gm 44. 4 gm 0.694 gm A1826 1.487 gm 46.1 gm A1827 46-4 gm

26. Exhibit	27.	28. ACTIVE DRUG INGREDIENT	WEIGHT	PER UNIT ANA	LYZED	32.	33.
No.	Lab. No.	(Established or Common Name)	29. Strength	30. Measure	131.40 Unit	TOTAL NET	RESERVE
7	A1825	N-Methyl-3,4-Methylenediaxyam	hetamine	BC1 HIAN	at a set of a	Lados to a	0.956 g
8	A1826	3.4-Methylenedioxyamphetamine				To a set of the co	0.643
9	A1827	N-(2-Methyethyl(-3,4,methyler	-		77.75.2		1.407 g
		dioxyamphetamine hydrochloride			77 27 24 0	TT a street	
				1	1, 111	v a meto	3 1
34. ANALYST (Signature) (b)(7)(C)		35. TITLE Forensic Chemist			36. DATE COMPLET 12/22/94		
37			38. TITLE	tory Direc	39. LAB. LOCATION McLean, VA		

Previous edition dated 10/87 is OBSOLETE.

DEA Form

(Apr. 1990)

U.S.	Department	oř	Justice	
Drug	Enforcement	A	dministration	

REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

Drug Emor	Cement Admi	instration		11	TONTO	DRUGI	INOI LINI		LLLOI		MOTIVOE	
1. HOW O	BTAINED (CH	eck)	Purchase	Seizure	Fre	e Sample	2a. FILE I	VO.		2b. PRC	GRAM CODE	3. G-DEP ID
Lab. S	Seizure (Specify	Money	Flashed Com	pliance Samp	le (Non-Crir	ninal)	R3-93-	2077	K B	N/A		(b)(7)(E)
4a. WHER	E OBTAINED	(City, St	ate/Country)	4b. DATE	OBTAINED) 117.1	5. FILE T	TLE) 64 Y 4		Kr.	- Control of the Cont
Lafayet	te. CA			October	27. 19	94	(b)(7)(C)		, k.*			
6a. REFER	RRING AGEN	CY (Nam	e)	6b. REFER		1 to 20		si n cop			2010 110	
5	- 1.6 ×	** 'N.	t de les estates de la constant de l	No. N/A	o. OR s	eizure No.	oct obe			TF	ROUP NO.	
9. Exhibit No.	10. FDII		11. ALLEGED	DRUGS	12. MARI	KS OR LABEL	S (Describe	fully)	APPRO		SS QUANTITY	ruichase
1			Unknown		White	Powder ****					105.9 00	
2			Unknown		White	Powder		3		2 21	106.7 gg	0.0
3	- N > 11	3 7 3	Unknown		Yellow	Liquid		1	*		42.4 99	0.1
BOOKERS TO THE CONTROL OF THE PROPERTY OF THE										1981	12	
1	in the	. 179	1 1 10 6 20 1		3 1 1 1 1 1 1		7.		10 O)		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
Administrate exhibits Road, Mo 17. SUBMI 19. No. PA 22. SEAL Broken	trative ibits to s were 1 clean, V	Inspec SFFD ater m irgini ECIAL AC 20. REC 23. f(b)(7	ailed to DE a, for anal SENT (Signature) EIVED FROM (Si	A Speci A Speci ysis.	ORY EVIC	(b)(7)(C),(b	e as will arch Lat	ORT ORT 24. TITL	, CA. sed by ory, 7	704 0	(7)(C),(b) tr (C) It Spring It Spring It sate and a serious production of the serious product	eansported he (b)(7)(C),(b)(7)
A1819			10870	.95 JAN	106.5	m	0.106 g	m		. •	105.8 g	m ¹
A1820)	**	2		107.0	çm	0.312 g	TIP!			106.7 g	01 .
A1821		politicon experimental place of contents and	3	(M)	43.3	çia	0.779 g	m	,		42.7 g	m
26. Exhibit	27. Lab.	28.	ACTIVE DRUG			Committee Commit	T PER UN		T		32.	33.
No.	No.	0 5	(Established or	- and a few so painted to the area and a		29. Strength	30. Mea	sure	31. U	nit	TOTAL NET	RESERVE
1	A1819		Imethoxy-4				D.V.	(N, V	- V		, , , , , , , , , , , , , , , , , , ,	0.098 gm
3	A1820 A8821		ethylenedi				-		- A44 - A8		(1: AAA (1)	0.280 gm
	ROOZI		lethylenedi	oxymetha	mpnetan	rue psee				107 - 1		0.583 gm
							10000 WHITE STORY		3, , 10,			
											THE STATE OF THE S	5-3 E
34. ANAL` (b)(7)(C)	YST (Signatur	e)				35. TITLE Forens	ic Chem	ist			36. DATE CO 12/20	MPLETED
37 APPRO (b)(7)(C)	(7)(C)			38. TITLE Laboratory Director 39. LAB. LOCATION McLean, VA								
DEA Form	and the second s	LI de l'acceptant de la company de la compan							Second Comment			

J.S. Department of Jus Drug Enforcement Admi	mistration										
1. HOW OBTAINED (C		Purchase	Seizure	Consessor .	e Sample	2a. FILE	E NO.	-	2b. PR0	OGRAM CODE	3. G-DEP ID
Lab. Seizure Other (Specify] Money FI	lashed Com	pliance Sampl	le (Non-Crim	ninal)	R3-93-	-2077		N/A	(b)	(7)(E)
4a. WHERE OBTAINED) (City, Stat	te/Country)	4b. DATE	OBTAINED		5. FILE (b)(7)(C)	TITLE	7			twag.
a. REFERRING AGEN	ICY (Name)	A	6b. REFER	RAL		(b)(1)(C)			C. P.		
1 to 86 to \$2 k				o. OR Se	izure No.	7. DATE	PREPAR	ED.	8.	GROUP NO.	
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17. SUBMITTED BY SP (7)(C),(b)(7)(F) 19. No. PAGKAGES 22. SEAL	(b)(7)(C),(b	, for anal	LABORATO	ORY EVID	(b)(7)(C),(b)(7)(F)		LE	704 0	io spiring	louse louse
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17. SUBMITTED BY SP (7)(C),(b)(7)(F) 19. No. PACKAGES 12. SEAL 18. Broken Unbroken 15. ANALYSIS SUMMA 18. Lab 18. A1822 A1823	(b)(7)(C),(b) 20 RECE (b)(7)(C) ARY AND F Exhib	LAREMARKS	BORATOR 107.6	ORY EVID	(b)(7)(C),(c),(c),(c),(c),(c),(c),(c),(c),(c),(c	CEIPT RE	21. TITE 24. TITE 24. TITE	LE LE	T aft 106	er Analys .4 gm	
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	DISPOSITION OF I	DRUG EVIDENCE	n 27	DR3-93-2077		March 20	, 1996	5
	(Do NOT Use For No	96 11	NR 27	FILE TITLE (b)(7)(C)				
OBIGINATOR			CUSTO	DIAN (Name of DEA Lab	oratory and	Laboratory Chi	ef)	
	ame of Field Office and Car ancisco D wwssio n			al Testing and				
Sail FL	MICISCO DEVENTOR	OULICE		Old Springhouse			•	
			McLea	n, VA 22102-3	494			
			(b)(7)(C)		Laburat	cory Direc	ctor	
	(T) (1)	PAR		dad as oridones	and shou	ld bo		-
— 4:		exhibits in this case are no	longer	needed as evidence	and shou	ild be		
X disposed of	in accordance with Adr	ninistration instructions.						
transf	ferred to							
		(Agency)				LABORAT	ORY	
Eublis No.	Laboratory No.	AGENT	Drug		Transfer	red Destroyed		Stock
Exhibit No.	A1864	Unknown tan veget		atter		X		
40	A1004	contained in a bo	x #222	231		/		
47	A1865	Unknown tan powde		ained in a		1		
		plastic jar #222	06			-		
				ations resemble to the section of th				
							1	
70	V7VOV (5 V7VE)	* * * * * * * * * * * * * * * * * * * *		(b)(7)(0) (b)(7)(E)				
AM (b)(7)(C),(b)(7)(F)		n All	(b)(7)(C),(b)(7)(F)	7.	6.10		
CASE AGEN	IT (Signature)	320/96 DATE		APPROVING OFFICIAL (Signature)	2496 DA	r.Fa. see	
	/	DAD	T II					4 S 2
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On	(Date)	going exhibits were disposed of	as maic	ated above,				
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EVIDENCE	TECHNICIAN (Signature a	(b)(7)(C)	WIT	NESS (Signature and Date			A.	15
				74.196				
		LABORATORY CHIEF (Sign	ature and	Date)				
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	(Name of Field Office and Ca			DIAN (Name of DEA Labor				
	rancisco Division			ial Testing and R Old Sp r inghouse		1 Laburacc	ory	
Diver	sion Investigator		MCLA	an, VA 22102-349	A A			
			(b)(7)(C)			tory Direc	ctor	
		PAF	RT I					
disposed	The following of in accordance with Adr	exhibits in this case are no ministration instructions.	olonger	needed as evidence a	nd shou	ld be	,	
tran	sferred to							- .
		(Agency)	Ba	TANK Y				
E-LUC NI		AGENT	\$4. ×			LABORATO		Canali
Exhibit No.	Laboratory No.		Drug		Transferr	ed Destroyed F	Retained	Stock
- 44	A1862	Unknownttablet in contained in a gla	100					
		contained in a gra	TSS AT	31 #22704	1 0 A			
45	A1863	Unknown tan powder	cont	ained in a glass		V		
		vial #22221		37.70	SAL!			
	,,,,,,,		-		41.5			
		200		Annual State of the State of th				
27.								
CASE AGE	NT (Signature)	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	RT II	(b)(7)(C),(b)(7)(F)	gnature)	3/22/90 DATE		
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(b)(7)(C)	(Date)	1.101	(b)	(Agency) 7)(C)				76 1 0 4 1
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EVIDENC	E TECHNICIAN (Signature a		v					11.84
		(b)(7)(C)		V	1.53			
- Saing				7/25/16				
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		FILE NUMBER		DATE	006
	DISPOSITION OF	DRUG EVIDENCE R3093-2077		March 20, 1	996
	(Do NOT Use For No	on-Drug Evidence) 96 MAR 27 P FILE TITLE (b)(7)(C)	and the second		
DRIGINATOR (N	lame of Field Office and Cas	custodian (Name of DEA.	Laboratory and	Laboratory Chief)	
	ancisco Division			ch Laboratory	
Divers	ion Investigator	(b)(7)(C),(b)(7)(F) 7704 Old Springhou			
		McLean, VA 22102-		home Discato	
		PART I	Labor	atory Directo	F
_		exhibits in this case are no longer needed as eviden ninistration instructions.	ce and shou	ald be	
		(Agency)			
		AGENT		LABORATORY	
Exhibit No.	Laboratory No.	Drug		red Destroyed Retai	ned Stock
41	A1859	Unknown yellow & red tablets contains in a glass vial #22201	ed	*	
//2	A1860	Unknown 4 white tablets contained in	2	X	
A No.		glass vial #22203		/	
43	A1861	Unknown 8 white tablets contained in	a	1	
		glass vial #22202	-		
CASE AGEN	T (Signature)	DATE APPROVING OFFICIA	L (Signature)	3/24/96 DATE	
On 7/	19/9/ the force	going exhibits were disposed of as indicated above.			
011	(Date)	going exhibits were disposed of as indicated above.	然先		
On	the fore	going exhibits were transferred to			
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(A A A		(b)(7)(C)	- 01		
		7/24/96	1/25	196	
EVIDENCE"	TECHNICIAN (Signature as	(b)(7)(C) WITNESS (Signature and De	ate)		
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		2/10/11		in Profession	
		LABORATORY CHIEF (Signature and Date)	THE PERSON NAMED IN		
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	DISPOSITION OF	DRUG EVIDENCE	R3-93-2077		March 2	0, 1996
	(Do NOT Use For N	on-Drug Evidence)	96 MAR 2(b)(7)(c)			
ORIGINATOR (N	ame of Field Office and Co		CUSTODIAN (Name of DEA Labor	M.D.		ief)
San Fra	ancisco Division	Office	Special Testing and		100	DESCRIPTION OF STREET
Divers	ion Investigator	(b)(7)(C),(b)(7)(F)	7704 Old Springhouse			
			McLean, VA 22102-34	94		
		D.A.	(b)(7)(C)	Labora	atory Div	ector
	The following		ART I			
disposed of	in accordance with Ad	ministration instructions.	no longer needed as evidence a	nd shou	ld be	
Ca disposed of	in accordance with Ad	ministration metractions.				
transf	erred to			-		
**************************************		(Agency)			100	
Exhibit No.		AGENT		 	LABORAT	
38	Laboratory No.	Holeson has savede	Drug	Transferr	ed Destroyed	Retained Stoc
	A1030	vial #22225	er contained in a glass		1	
		THE THE PARTY OF T				A PART
39	A1857	Unknown tan powde	er contained in a glass		X	10 to 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
		vial #22205				
40	23000		7		V	
40	A1858	class vial #2221	wder contained in a	-	A	V4. (
		grass viar #2221				11.00
CASE AGEN	T (Signature)	3/20/96	(b)(7)(C),(b)(7)(F) APPROVING OFFICIAL/(Signature)	gnature)	1/24/96 DAT	ΓE
		PA	ART II	A COLON AL COLON ACCOUNTS		
On	9/96 the fore	going exhibits were disposed	of as indicated above.			
On		going exhibits were transferre				
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35	A1853	er cont	ained in	Transferred	Destroyed	Hetained	Stock	
		glass vial #22222			1	1		_
36	A1854	Unknown white pryst	als co	ontained in a		X		
		glass vial #22216	***************************************					
37	A1855		-					
7/	AIROO	Unknown white cryst	als co	ontained in a		X		
		glass vial #22227	-		-		_	
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	ancisco Division			ial Testing and		
Diversi	ion Investigator	(b)(7)(C),(b)(7)(F)	7704	Old Speinghouse	e Road	
ALC: NO.			McLe (b)(7)(C)	an, VA 22102-34	Laboratory D	rector
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disposed of	in accordance with Adr	exhibits in this case are ninistration instructions.	no longer	needed as evidence a	and should be	
		(Agency)				. = 0.5%
Exhibit No.	Laboratory No.	AGENT	Drug			ATORY ed Retained Stock
32	A1850	Unknown white po		tained in a glas		
33	A1851				X	
34	A1852	Unknown white po		ne powder in a	X	
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Divers	ion Investigator	p)(7)(C),(b)(7)(F)	7704 Old KSpinghouse		
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29	A1847	Unknown pink pow	der contained in a		X
A		glass vial #2220		100 m	
3				8 74 560	1
30	A1848		er contained in a glass	1	X
		vial #22230		100	
53	21040	The state of the s		10.0	
31	A1849	vial #22223	wder contained in a gla	85	
		VIAL #22223		-	
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26 A1844 Iloknownwhite powder contained in a glass Vial #22213 27 A1845 Uloknown white powder contained in a glass Vial #22210 28 A1846 Iloknown tan powder contained in a glass Vial #22220 28 A1846 Vial #22220 Vial #22220 CASE AGENT (Signature) DATE APPROVING OFFICIAL (Signature) DATE On (Date) The foregoing exhibits were disposed of as indicated above. On (Date) (Agency) [D)(7)(C) (D)(7)(C) (D)(7)(C) EVIDENCE TECHNICIAN (Signature and Date) (Agency) [D)(7)(C) (D)(7)(C) (D)(7)(C) LABORATORY CHIËF (Signature and Date) LABORATORY CHIËF (Signature and Date) [D)(7)(C) (D)(7)(C) (D)(7)(C) [D)(7)(C) (D)(7)(C) (D)(7)(C) (D)(7)(C) [D)(7)(C) (D)(7)(C) (D)(7)(C) (D)(7)(C) [D)(7)(C) (D)(7)(C) (D)(7)(C) (D)(7)(C) (D)(7)(C) [D)(7)(C) (D)(7)(C) (D)(7)(Dinorecinent	. Manual de la constantia		N. 150	The second of the second second second		J. J. J.		
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	Name of Field Office and C		CUSTODIAN (Name of DEA Labo	ratory and La	boratory Ch	ief)	
San Fr	ancisco Divistor	Office (b)(7)(E)	Special Testing and	Research	Laborat	ory	
Divers	sion Investigator		7704 Old Springhouse McLean, VA 22102-34	94			
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23	A1841	Hoknown Tan powde	er contained in a blass	5 9' 12	X		
		vial #22228			-		
- 04	11040			4 4	V		_
24	A1842	bial #22211	Unknown brown liquid contained in glass				-
-1 1	N. E.						
25	A1843		wder contained in		1		-
		glass vial #2220	A STATE OF THE STA	200		32 ₈₁ 1 .	-
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San F	rancisco Division	Office	Special Testing a 7704 Old Springho McLean, VA 22102-	ouse Road	Laborate	ory	
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		AGENT	and the second		LABORAT		
Exhibit No.	Laboratory No.		Drug	· · · · · · · · · · · · · · · · · · ·	ed Destroyed	Retained	Stock
20	A1838	Unknown White po	wder centained in g	lass	X		
21	A1839	Unknown tan powd vial #22218	er contained in a bl	lass	Х		
22	A1840	(h)(7)(C)	er contained in a gl 22209	lass	X		
MIZ	(b)(7)(C),(b)(7)(F) NT (Signature)	3/20/9/ DATE	(b)(7)(C),(b)(7)(F) APPROVING OPFICE	NAL (Signature)	3/24 g	E	
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	rancisco Division		Special Testing and Research Laboratory							
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			McLean, VA 22102-349	94						
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		(Agency)								
		AGENT			LABORAT					
	Exhibit No. Laboratory No. Drug			Transferred	Destroyed	Retained	Stock			
17	A1835	#22212	Unknown Tan Powder in glass vial							
		W labeled la		1						
18	A1836	Unkoww White powd	er in glass vial		X					
		#22226								
					.,					
19	A1837		r contained capsules		X					
		further contained #22219	in glass vial							
		#22219			L					
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nti		3/20/6/	(5)(1)(5),(5)(1)(1)	3/1	2/06					
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16	A1834	Unknown tan powder		ablet contained		X		
		in glassine baggie	1	And the second second		-		-
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ORIGINATOR	(Name of Field Office and Case		CUSTODIAN (Name of DEA Labo	ratory and Lal	oratory Ch	ief)	
	cancisco Division (Special Testing and	Research	Labora	atory	
Divers	sion Investigator (b)(7)(C),(b)(7)(F)	7704 Old Springhouse				
			McLean, VA 22102-				
			(b)(7)(C)	Laborat	ory Dir	cector	
		PAR	TI				
disposed	The following of in accordance with Adm		longer needed as evidence a	ind should	be		
tran	asferred to	(Agency)					
				T -	LABORAT	CORV	
Exhibit No.	Laboratory No.	AGENT	Orug	Transferred			Stock
13				Transferred	V	riotamed	Stock
	A1831	Unknown tan powder glass vials	contained in		~		
		yrass viais					
14	A1832	Unknown tablets co	ontained in box		Y		
					,		
15	A1833	Unknown tan powder	contained in clear		X		
		baggies	baggies				
				-			
na	(7)(C),(b)(7)(F) NT (Signature)	3/20/96 DATE	(b)(7)(C),(b)(7)(F) APPROVING ØFFICIAL/(SI	16	1496 DA	TE	
		PAR	TII		***************************************		
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On	(Date) the foreg	oing exhibits were transferred	to(Agency)	-			
(b)(7)(C)	(2007)		(b)(7)(C)				
0 000		7/24/96		7/25	195		
EVIDENC	E TECHNICIAN (Signature an	d Date) (b)(7)(C)	WITNESS (Signature and Date)				
			1/25/96				
		LABORATORY CHIEF (Sign	ature and Date)				
REMARKS						No statement of the last of th	

and the second			FILE NUMBER	ID	ATE					
	DISPOSITION OF	DRUG EVIDENCE 10/4	a summer conduction and the conduction		March 2	0, 1996	5			
		20	MAR 2 FILE TITLE	15						
		Von-Drug Evidence)	(b)(7)(C)							
RIGINATOR (N	lame of Field Office and C	ase Agent)	CUSTODIAN (Name of DEA Laboratory and Laboratory Chief)							
	ancisco Divisior ion Investigat y		McLean, VAA 22102-3	Special Testing and Research Laboratory 4004 Old Springhouse Road McLean, VAA 22102-3494						
		PA	ART	Laborato	ra nire	CLOL	J.			
_		ministration instructions.	no longer needed as evidence	and should	be		A.			
		(Agency)								
-		AGENT		7	LABORAT	T				
Exhibit No.	Laboratory No.		Drug	Transferred	Vestroyed	Retained	Stock			
10	A1828	glass vials	Unknown white powder contained in 7 glass vials							
11	A1829	linknown vellow li	Unknown yellow liquid contained in 3							
No.	A1029	glass vials								
111		3.00	91855 VIRRES							
12	A1830	Unknown tan powde	er contained in 3		X					
		plastic baggies			,					
DIE)(C),(b)(7)(F) 17 (Signature)	3/20/96 DATE	(b)(7)(C),(b)(7)(F) APPROVING OFFICIAL (Signature)	122/98 DA	Ç TE				
The state of the s		PA	ART II							
On 7//	9 / 9 6 the for (Date)	regoing exhibits were disposed	of as indicated above.							
On		egoing exhibits were transferr	ed to (Agency)	PR STATE OF THE ST	4.02 3					
(b)(7)(C)	(Date) **TECHNICIAN (Signature)	7/24/96	(b)(7)(C) WITNESS (Signature and Date	าไม้	9/96					
		(b)(7)(C)	1/2 196 Signature and Date)				V.			

REMARKS

DISPOSITION OF DRUG EVIDENCE (Do NOT Use For Non-Drug Evidence) ORIGINATOR (Name of Field Office and Case Agent) San Francisco Division Office Diversion Investigator (b)(7)(C),(b)(7)(F) Diversion VA 22102-3494	
(Do NOT Use For Non-Drug Evidence) ORIGINATOR (Name of Field Office and Case Agent) San Francisco Division Office Diversion Investigator (b)(7)(C),(b)(7)(F) Diversion Investigator (b)(7)(C),(b)(7)(F) Diversion Investigator (b)(7)(C),(b)(7)(F) Diversion Investigator (b)(7)(C),(b)(7)(F) ORIGINATOR (Name of DEA Laboratory and Laboratory Chief) Special Testing and Research Laboratory 7704 Old Springhouse Road	
(Do NOT Use For Non-Drug Evidence) ORIGINATOR (Name of Field Office and Case Agent) San Francisco Division Office Diversion Investigator (b)(7)(C),(b)(7)(F) CUSTODIAN (Name of DEA Laboratory and Laboratory Chief) Special Testing and Research Laboratory 7704 Old Springhouse Road	
San Francisco Division Office Special Testing and Research Laboratory Diversion Investigator (b)(7)(C),(b)(7)(F) 7704 Old Springhouse Road	
Diversion Investigator (b)(7)(C),(b)(7)(F) 7704 Old Springhouse Road	
MCLean, VA 22102-3494	
	Ser.
(b)(7)(C) Laburatory Director	
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	
(Agency)	
AGENT	
The second secon	ock
7 A1825 Unknown Amber Lightid	
8 A1826 Unknown White Powder X	
9 A1827 Unknown White Powder X	
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	-
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3/2496	
CASE AGENT (Signature) DATE APPROVING OFFICIAL (Signature) DATE	
PART II	
On the foregoing exhibits were disposed of as indicated above.	
On the foregoing exhibits were transferred to	
(Date) (Agency)	-
(b)(7)(C) $(b)(7)(C)$	
7/24/96	
EVIDENCE TECHNICIAN (Signature and Date) WITNESS (Signature and Date)	•
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LABORATORY CHIEF (Signature and Date)	
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	DISPOSITION OF D	RUG EVIDENCE	MAR 27	R3-93-2077		March 2	0, 199	6
	(Do NOT Use For No	n-Drug Evidence)		(b)(7)(C)				
ORIGINATOR (Name of Field Office and Case	Agent)	CUST	ODIAN (Name of DEA Labo	ratory and Lai	boratory Ch	ief)	
	rancisco Di bi sion		Spec	cial Testing and R	esearch !	Laborat	ory	
Divers	sion Investigator ()(7)(C),(b)(7)(F)	7704	1 Old Springhouse	Road			
	_		(b)(7)(C)	ean, VA 22102-349	4 Laborato	ru Dina	ctor	
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disposed o	of in accordance with Adm	inistration instructions.						
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Exhibit No.	Laboratory No.	Unknown White	Drug Doundale		Transferred	Destroyed	Retained	Stock
4	A1822	OGMIOWIT WILL CO	e rowaer		na de compositivo de	1		
5	A1823	Unknown White	e Powder			X		
	* 7 C O A	T T = 1 F. 75° ° 1.	Davida		-	X		-
6	A1824	Unknown White	e Powaer					
			The state of the s					
			\					
	(b)(7)(C),(b)(7)(F)	/ /		(b)(7)(C),(b)(7)(F)				
111		3/20/96			1	3/22	196	
CASE AGE	NT (Signature)	/ DATE	BIOGRAPHICA	APPROVING OFFICIAL (SI	ignature)	DÁ	TÉ	
			PART II					
On 7//	Committee of the Commit	oing exhibits were dispos	sed of as ind	icated above.				
On	(Date)	oing exhibits were transfe	orred to					
***	(Date)	onig exhibits were transit	erred to	(Agency)				Ministering
(b)(7)(C)		a la ula	(b)(7)(C)	- 1	lac		
		1/24/96			0/25	146		
ÉVIDENCI	E TECHNICIAN (Signature and	(b)(7)(C)	WI	TNESS (Signature and Date)				
		(-/(-/(-/						
			1	1/25796				
		LABORATORY CHIEF	(Signature al	nd Date)				
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DEA Form (Feb. 1986) - 48

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	DIODOGUMANA			FILE NUMBER		DATE	00 300	
	DISPOSITION OF D	PRUG EVIDENCE	AP 27	R3-93-2077		March 2	.0, 199	16
	(Do NOT Use For No.	n-Drug Evidence)		(b)(7)(C)	Ŷ		*	
ORIGINATOR	(Name of Field Office and Case	Agent)	CUSTO	DIAN (Name of DEA Labor	ratory and L	boratory Cl	nief)	TO THE REAL PROPERTY AND THE PERSON NAMED IN
	rancisco Division		Spec	ial Testing and	Resdarch	Labora	itory	
Diver	sion Investigatore	(b)(7)(C),(b)(7)(F)		Old Springhouse				
			MCLe (b)(7)(C)	ean, VA 22102-34		Ĭ,		
					Laborat	ory Dir	ector	oje Antonijuski inglijaliji j
	The following		RT I					
disposed a	of in accordance with Admi	exhibits in this case are no	o longer	needed as evidence a	nd should	be		
Ligi disposed (or in accordance with Adm	mistration instructions.						
tran	sferred to							
		(Agency)				THE RESERVE OF THE PARTY OF THE	Accounts to the second control of the second	AMERICAN, a
-		AGENT				LABORA	TORY	
Exhibit No.	Laboratory No.		Drug		Transferred	Destroyed	Retained	Stock
	A1819	Unknown White P	owder			X		
2.	A1820	Unknown White Po		-	-			
	THE RESIDENCE OF THE PROPERTY	Ommown willer		/				
3	A1821	Unknown Yellow	Unknown Yellow Liquid			X		-
			sor and cold find and cold				 	1
	Aurolas Balgonia vignoja gadaniai salakulais vari erveni ergina balaniar sala salakullas Lai visusya nasa							
			Martin allo 1978 Washington					
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M		2/2/61	((b)(7)(C),(b)(7)(F)		7/	/	
CASE AGE	NT (Signature)	1/20/9()		PPROVING OFFICIAL (Sig		7/24	76	
		DATE		PHOVING OFFICIAL (Sig	nature)	DA	re .	
27/	alai		RTII		The Party of the P			
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400 0000 100000 10000000000000000000000	(Date)		1 00	(Agency)		A CONTRACTOR OF THE PARTY OF TH		nonemplangerough
(b)(7)(C)		101/0	(b)(7		1			
		7/24/96			2/	24/98	2	
EVIDENCE	TECHNICIAN (Signature and		WITN	ES\$ (Signature and Date)		-1111	***************************************	Mando spri ga
	T)	(b)(7)(C)		V				
			-11	101				
		L PORATORY OURSE (S)		1346				
		LABORATORY CHIEF (Sign	ature and I	Jate)				
REMARKS					AND AND ASSESSMENT OF THE PARTY		No the last of the	

DEA Form - 48 (Feb. 1986) - 48

U.S. Department of Justice Drug Enforcement Administration	-<		
REPORT OF INVE	STIGATION	Pa	ge 1 of 1
1. Program Code	2. Cross Related Files File	3. File No. R3-93-2077	4. G-DEP Identifier (b)(7)(E)
5. By: (b)(7)(C),(b)(7)(F) D/I At: San Francisco DO		6. File Title (b)(7)(C)	
7. Closed Requested Action Completed Action Requested By: 9. Other Officers:		8. Date Prepared December 30, 1	996
10. Report Re: Reciept of DEA I	Form 48s from Specia	l Testing Laboratory	(PM40)
DETAILS: 1. Reference is made to the attached D number and title. A memo dated Marchdrug exhibits 1-47 be destroyed. Evide forwarded the DEA Form 48s dated Juneattached DEA Form 48s dated DEA Form 48s da	n 21, 1996 was sent to the Sence Technician (b)(7)(C)	pecial Testing and Research of the Special Testing and	Laboratory requesting that the d Research Laboratory
1. DEA Form 48s, Disposition of Dru	g Evidence (17)		
INDEXING SECTION: 1. (b)(7)(C)			

11. Distribution:

Division

District

Other

SARI, ODOD

DEA FORM (Aug. 1994) - 6 (b)(7)(C), (b)(7)(F)

District

Diversion Investigator

(b)(7)(C), (b)(7)(F)

Diversion Investigator

12/31/96

Pervisor

DEA SENSITIVE

DEA SENSITIVE '
Drug Enforcement Administration

2 - SARI (Pink)

	TIGATION			Page 1 of	2
1. Program Code	2. Cross	Related Files	3. File No.	4. G	-DEP Identifier
	File		R3-93-2077	(b)(7)(E)
5. By: (b)(7)(C),(b)(7)(F)			6. File Title		-
At: Diversion Investigator			(b)(7)(C)		
San Francisco, CA					
7. Closed Requested Action Completed			8. Date Prepared		
Action Requested By:					
9. Other Officers:		THE CASE PROPERTY OF THE PROPERTY OF THE STATE OF THE STA	March 21, 19	196	
10. Report Re: Response to Spec drug evidence (PM40)	cial Testi	ing Laborato	ry Memo, request	for dest	ruction of
DEWATT C.					
DETAILS:					
1. Reference is made to the	attached	memo dated	February 21 190	6 former	lod by (b)(7)(C)
, Laboratory Direct					
)(7)(C) has requested that th					
exhibits to determine discrep	ancies ar	nd that the	office submit a	DEA Form	48 for any
evidence which may be destroy	ed. The	Special Tes	ting and Researc	h Laborat	ory lists
exhibits 1-47 for this case n		•			
After a review of the cas	e file, i	t was deten	mined that exhib	its 1-47	that were sent
to the Special Testing Labora	tory pert	ained to ex	hibits gathered	at the re	sidence of
to the Special Testing Labora Alexander SHULGIN. As Dr. SH	ULGIN has	ained to ext	hibits gathered d his DEA regist	ration an	d been ordered
to the Special Testing Labora Alexander SHULGIN. As Dr. SH to pay a civil fine, it was d	ULGIN has	ained to ext surrendered that the ex	hibits gathered d his DEA regist xhibits obtained	ration an	d been ordered IN's residence
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REPORT OF INVESTIGATION (Continuation)	1. File No. R 3-93-2077 3. File Title (b)(7)(C)	2. G-DEP Identifier (b)(7)(E)
Page of 2 2 5. Program Code	6. Date Prepared March 21, 19	006

INDEXING SECTION:

1. (b)(7)(C)
AX2. SHUT

SHULGIN, Alexander - Naddis: (294983

DEA Form (Aug. 1994) - 6a

DEA SENSITIVE
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2 - AMRI (PINK)

REPORT OF INVEST	IGATION		Page 1 of
1. Program Code 5. By: (b)(7)(C),(b)(7)(F) At: Diversion Investigator San Francisco, CA 7. Closed Requested Action Completed Action Requested By: 9. Other Officers:	2. Cross Related File	3. File No. R3-93-2077 Blica Title (b)(7)(C) B. Date Prepared January 12,	4. G-DEP Identifier (b)(7)(E)
O. Report Re: PAYMENT OF \$25,00 (RA40)	00.00 FINE, SURI	RENDER OF REGISTRATI	ON BY ALEXANDER SHULGIN

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 PS0061616, 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
- 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

ATTACHMENTS:

- Settlement Agreement
- \$25,000.00 check
- DEA Certificate
- Controlled substance destruction list
- **DEA 104**

INDEXING SECTION:

(rug. 1334)	DEA SENSITIVE Drug Enforcement Administration This report is the property of the Drug Enforcement	2 - AMRI (PINK)	
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11. Distribution:	12(4)(7)(6)(4)(7)(5)		

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4. Page of 2	y 1		
5. Program Code		6. Date Prepared January 12,	1996

SHULCIN, ALEXANDER T. - NADDIS: 294983, 1904492

DEA Form (Aug. 1994) - 6a

DEA SENSITIVE **Drug Enforcement Administration**

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Drug Enforcement Administration					
REPORT OF INVESTIGATION			Page 1	of 2	
1. Program Code 2. Cross File	Related Files	3. File No. R3-93-	2077	4. G-DEP Ide (b)(7)(E)	entifier
5. By: (b)(7)(C),(b)(7)(F) At: Investigator San Francisco, CA	A	6. File Title (b)(7)(C)	2011		
7. Closed Requested Action Completed		8. Date Prepared			
Action Requested By: 9. Other Officers:		Novemb	er 28, 199	15	
10. Report Re: Meeting with AUSA (b)(7)(C) financial settlement and		er SHULGIN of DEA Regi			, pending
DETAILS: 1. On November 27, 1995, Investigate stated that Alexander SHULGIN has ag DEA Registration PS0061616 to settle been issued against SHULGIN's DEA Registration PS0061616 to settle been issued against SHULGIN's DEA Registration PS0061616 to settle been issued against SHULGIN's DEA Registration PS0061616 to settle been issued against SHULGIN's DEA Registration PS0061616 to settle been issued against SHULGIN's DEA Registration PS0061616 to settle been issued against SHULGIN's DEA Registration PS0061616 to settle been issued against SHULGIN's DEA Registration PS0061616 to settle been issued against SHULGIN's DEA Registration PS0061616 to settle been issued against SHULGIN's DEA Registration PS0061616 to settle been issued against SHULGIN's DEA Registration PS0061616 to settle been issued against SHULGIN's DEA Registration PS0061616 to settle been issued against SHULGIN's DEA Registration PS0061616 to settle been issued against SHULGIN's DEA Registration PS0061616 to settle been issued against SHULGIN's DEA Registration PS0061616 to settle been issued against SHULGIN's DEA Registration PS0061616 to settle been issued against SHULGIN's DEA Registration PS0061616 to settle been issued against SHULGIN's DEA Registration PS0061616 to settle been issued against SHULGIN's DEA Registration PS0061616 to settle been ps006166 to settle been ps006166 to settle been ps006166 to sett	reed to pay	a \$20,000.0	O fine and		
2. Reference is made to the attaches submitted to AUSA (b)(7)(C) documenting the last 5 years revealed the follows -SHULGIN has significant assets	ng SHULGIN's ing:	financial	status and	disburs	ements for
-Alexander SHULGIN is a paid cor Parnassus Avenue, San Francisco	, CA 94143.				
-Alexander SHULGIN expends sign to be working on a second book				g book PII	dKAL, claims
-Alexander SHULGIN's disbursement referencing retired (b)(7)(C) SHULGIN's. (b)(7)(C)	nts indicate	payments t			hemian Club of Alexander
-Alexander SHULGIN's disburseme Bryant Labs for chemicals.	nt records i	ndicate pay	ments to A	Aldrich cl	hemicals and
-Alexander SHULGIN travels to S	pain, Italy	and Russia.			
3. SHULGIN's financial statement ha		red to the	IRS for re	eview.	
11. Distribution:	c),(b)(7)(F)				10 Del-
Division					13. Date
District 14. App	(b)(7)(C),(b)(7)(F)		_		15. Date
Other SARI, ODOD			upervisor		1/30/95
DEA Form (Aug. 1994) - 6	DEA SENSITIV				

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REPORT OF INVESTIGATION (Continuation)	1. File No. R3-93-2077 3. File Title (b)(7)(C)	2. G-DEP Identifier (b)(7)(E)
Page of 2		
5. Program Code	6. Date Prepared	
	November 28	, 1995

ATTACHMENTS:

1. Alexander SHULGIN financial statement

INDEXING SECTION:

Aldrich Chemical - Naddis: 294983

Aldrich Chemical - Naddis: 622721

BRYANT LABS - NADDIS: 1732896

(b)(7)(C)

(b)(7)(C)

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5. BY: (b)(7)(C),(b)(7)(F)			R3-93-2077 6. FILE TITLE	(b)(7)(E)	
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AT: Investigator San Francisco, CA		H	X		
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7. Closed Requested Action Completed			8. DATE PREPARED		
9. OTHER OFFICERS: D/T (b)(7)(C),(b)(7)	12		August 25, 19	995	
9. OTHER OFFICERS: D/I (F)					8
10. REPORT RE: Alexander SHULGIN	(NADDIS	: 294983) Pro	posal to AUSA ((RA40)	
				- 1	
DETAILS:		/			
and the terms of the property					
1. Reference is made to the at	tached	correspondence	e, dated August	17, 1995,	from (b)(7)(C)
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and his proposal that A registration and that SHULGIN w	mexante	bere to all I	EA and state	rements	Attomar
made no reference to se					
Office.		Transition of	action by	THE COLD ! IT	22.1.0,0
(b)(7)(C)					
2. AUSA has requested	i that S	HULGIN submit	a financial st	atement.	
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13, 1995.	.iaclon.	Judge bitth	er nas set a ne	earing date	tor rebrua
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ATTACHNENTS:					
1. Attorney (b)(7)(C) correspond	lence de	ited August 17	1005		
Correspond	ience da	Leu August 1/	, 1995		
INDEXING SECTION:					
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. SHULGIN, Alexander - NADDIS	: 29498	3			
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11. DISTRIBUTION:	12(t	o)(7)(C),(b)(7)(F)			13. DATE
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5. BY: (b)(7)(C),(b)((*)(*)			6. FILE TITLE (b)(7)(C)		(b)(7)(C)
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7. Closed Re	equested Action Completed			8. DATE PREPARED		
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9. OTHER OFFICER	D/I (b)(7)(C),(b)(7)(F)					
10. REPORT RE:		101.4°+144.42**********************************	1			
	Meeting with SHU	JLGIN's A	ttorney, Stat	us Report (RA40)		
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DETAILS?			' /			
					* 1	
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Alexander SH	ULGIN's (NADDIS	294983	attorney (b)(7)(C)	at the San	Franci	sco United
States Attor	mey's office. Al	ISA (b)(7)(C)		was detained		
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Drug Enforcement Administration		
REPORT OF INVESTIGATION (Continuation)	1. File No.	
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5 Program Code	6 Date Prepared	

August 16, 1995

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SHULGIN, Alexander - NADDIS: 294983

DEA Form (Aug. 1994)

DEA SENSITIVE **Drug Enforcement Administration**

2 - AMRI (PINK)

U. S. Department of Justice Drug Enforcement Administration	<i>></i>				
REPORT OF INVEST	IGATION		Page 1	1	
1. Program Code	Cross Related Files File	3. File No. R3-93-	20 7 7	4. G-DEP Identifier (b)(7)(E)	
5. By: (b)(7)(C),(b)(7)(F) At: Investigator San Francisco, CA		6. File Title			
7. Closed Requested Action Completed Action Requested By:		8. Date Prepare June 9			
9. Other Officers: S/A (b)(7)(C),(b)(7)(F)		1 Jule 9	, 1777		
SHULGIN's attorney indicating his client. AUSA (b)(7)(C) states may receive a maximum	documents a telepho g that AUSA (b)(7)(C) tates in her letter, of \$25,000 for each	to Alexande ne conversa would be f "The statu of the 52	r SHULGIN's tion between orwarding a te provides violations	s attorney (b)(7)(c) en AUSA (b)(7)(C) a draft compla s that the Uni found by the	and int to ted
listed in the complaint". The Investigators of the DEA SFF of SHULGIN's DEA registered a conclusion of her letter, AUS to have a meeting prior to the conclusion of the letter, and the conclusion of the letter, and the little conclusion of the letter, and the little conclusion of the letter, and the little conclusion of	D Diversion Unit dur Analytical Laborator SA (b)(7)(C) provides ne filing of the com	ing the exe y located a SHULGIN's plaint. Order to Sh	cution of a t his resid attorney wi	an inspection lence. At the ith the opport	warrant unity er
SHULGIN's Analytical Lab Regi	istration. SHULGIN	has request	ed a heari	ng in this mat	ter.

- 1. AUSA Correspondence, dated June 5, 1995
- 2. Draft Complaint

INDEXING SECTION:

SHULGIN, Alexander - NADDIS: 294983

DEA Form (Aug. 1994) - 6	DEA SENSITIVE Drug Enforcement Administration	2 - AN	ARI (PINK)
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Division	'1		13. Date
11. Distribution:	(b)(7)(C),(b)(7)(F)		

REPORT OF INVESTIGATION			P	Page 1 of 5		
1. Program Code	2. Cross Rel	ated Files	3. File No. R3-93-2077	4. G-DEP (b)(7)(E		
5. By: (b)(7)(C),(b)(7)(F) At: Investigator San Francisco, CA 7. Closed Requested Action Completed Action Requested By:			6. File Title (b)(7)(C) 8. Date Prepared April 27, 199	05		
9. Other Officers:						
10. Report Re: Order to Show C DEA #PS0061616,	ause, Alexand Analytical L	er SHULG ab (RA40	IN (NADDIS: 29498)	33, 1904492	2),	

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 #PS0061616, 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, PS0061616, 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, PS0026206, as a researcher.



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2 - AMRI (PINK)

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- 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 SHULGIN 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, Methoathinone, 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 (D)(7)(C)

 [D)(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.
 - 3. 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.

DEA Form — **6a** (b)(7)(C)

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

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	April 27, 1995	

SHULGIN had no inventory or receipt records for this material.

- 4. On September 27, 1994, during an administrative inspection of the area of 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 "Nexus" (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, and manufacturing and destruction records in violation of 21

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

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

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CFR 1304.03 and 1304.27, and 21 USC 842(a)(5).

- 8. In April 1994, SHULGIN also failed to properly complete DEA 222 forms for commercial order and receipt of ethyltriptamine acetate and methylamino propiophenone HCL, both Schedule I controlled substances.
- 9. SHULGIN conducted human drug research with methcathinone analogs in violation of the Federal Food, Drug, and Cosmetic Act, in that SHULGIN failed to secure an approval for an investigational new drug application (IND) under 21 USC 360aa or a new drug application (NDA) under 21 USC 355(a), or maintain the required clinical testing records required by 21 USC 331(e) and 355(i), and 21 CFR 312.
- F. In June 1991, SHULGIN ordered and received 50 grams of cocaine, a Schedule II controlled substance, which he synthesized into 2, 3 Anhydroegognine. This product was subsequently sold to the University of California for \$2,785. At that time, SHULGIN was not registered with the DEA as a manufacturer of controlled substances. Furthermore, under the provision of 21 CFR 1301.22(b)(4), as an analytical laboratory SHULGIN was authorized to manufacture substances as a coincident activity only for analytical or instructional purposes and not for distribution. SHULGIN provided no records to indicate that this substance was transferred to another DEA registrant for analytical or instructional purposes.
- 3. The following procedures are available to SHULGIN in this matter:
 - 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)).
 - B. Within 30 days after the date of receipt of this Order to Show Cause SHULGIN may file with the Administrator a waiver 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)

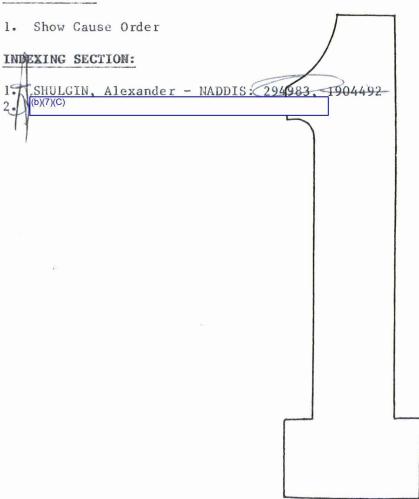
DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

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

ATTACHMENTS:



DEA Form — 6a (b)(7)(C)

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DRUG ENFORCEMENT ADMINISTRATION

REPORT OF INVES	TIGATION			Page 1 of	ř
1. Program Code	2. Cross	Related Files	3. File No.	4. G-DEP Ident	ifier
	File		R3-93-2077	(b)(7)(E)	
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San Francisco, CA	1 H		1		
7. Closed Requested Action Completed	1 1		8. Date Prepared		
Action Requested By:			April 26, 1	995	
9. Other Officers:					
10. Report Re: Meeting with EH	PA Re: SHULG	IN'S Labor	ratory (RA40)		
		And the second s		ì	
DETAILS:					
1. On April 26, 1995, Inves	stigator (b)(7)((C),(b)(7)(F)	met with (b)(7)(C)	, I	ederal on-
site Coordinator, Emergency	Response, E	PA, 75 Haw	thorne Street,	San Francisco, (CA 94105 to
discuss the findings of DEA'				boratory and pro	perty.
viewed a video ta	ape taken du	ring the i	nspection.		
2. (b)(7)(C) advised Investinspection of SHULGIN's prop	stigator (b)(7)(b)(7)(b)(7)(b)	C), F) that he	was interested	in doing an on-	-site
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AT Milwaukee, Wisconsin		3001	(b)(7)(C)			
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Action Requested By: 9. OTHER OFFICERS:		1	April 19,	1995		
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10.REPORTR Sales Data from ALDR by ALEXANDER SHULGIN RESEARCH			7, INC., MILLW	aukee, wi		
DETAILS:						
1. Reference is made to Report requesting sales information for Dr. Alexander Shulgin.	t of Inves	stigation d SH CHEMICAL	dated January L COMPANY, IN	7 25, 1995 NC., Milwa	, subject aukee, Wis	file, consin by
2. Attached is a printout date purchases of 2,5-Dimethoxyphene Office.	ed March 1 ethylamine	15, 1995, f previousl	from ALDRICH ly referred t	CHEMICAL to the San	reflectin Francisc	g the two o DEA
3. On March 28, 1995, a second equipment from 1/1/93 to the parch 29, 1995 reflecting 25 to	resent was	s issued to	o the firm.	of chemica Attached	als and che is a prin	emical tout dated
4. No further action by the	Milwaukee	DEA Offic	ce is deemed	necessary	at this	time.
INDEXING SECTION:		1 = 2				
1. ALDRICH CHEMICAL COMPANY		NADDIS #	#665089			
2. SHULGIN, Alexander		NADDIS #				
ATTACHMENTS:		200			C.	
ALDRICH letter dated March 24,	1995 with	enclosure	es.			
ALDRICH letter dated April 10,	1995 with	enclosure	es.			
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1. On March 8, 1995, Dr. SHU	LGIN's	to mey (b)(7)(C)	telepho	nically contacted	
MWestigator and reques	ted info	rmation on th	e status of Dr		
application for registration	as an A <u>n</u> a	alytical Lab	Schedules 1-5		state
that he received a call from	Dr. SHUL	GIW's associa	te, (b)(7)(C)	(b)(7)(C)	aske
Investigator $(b)(7)(C)$, $(b)(7)(F)$ if an AUSA	was requ	uesting a gra	nd jury relation	ng to the investiga	tion c
Or. SHULGIN or (b)(7)(C) In	vestigat	or (b)(7)(C), resp	onded that he	was not aware of a	grand
jury inquiry at this time.	C	(D)(7)(F)			0
	(b)(7)	(C)			
2. On March 9, 1995, Investig			(b)(7)(C)	ODOC regarding	
SHULGIN's renewal application	(b)(7)(C)	located	the subject a	pplication and stat	ed tha
she was maintaining the applic	cation be	ecause there	is an Administ	rative Code 6 place	d on
the registration based on a po	ending Si	how Cause act	ion against SH	ULGIN's DEA registr	ation.
faxed a copy of SHU	LCIN's re	enewal applic	ation to the Di	EA SFFD. The appli	cation
is dated January 27, 1995. Si	HULGIN fa	ailed to note	on his applica	ation that he had h	is DEA
Schedule 1 Researcher registra	ation rev	voked in 1977	by the DEA and	d his stated Schedu	le l
research authority revoked by	the Cal:	ifornia Resea	rch Advisory Pa	anel.	
		- 1			
ATTACHMENTS:					
*		- 1			
1. SHULGIN DEA Renewal Appli	cation				
INDEXING SECTION:		-d' \\0 ' \-	-		
A		- Burl			
1. SHULGIN, Alexander - NADD:	IS 2949	33, 1904492			
2 + ((0)(1)(0)					
		J. J. Little			
	(b)	(7)(C),(b)(7)(F)		T	DATE
1. DISTRIBUTION:				13. 0	JAIL
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1. DISTRIBUTION: REGION	1			3	116/9
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			r	3/	116/9. DATE
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REPORT OF INVESTI	GATION	•	Pa	age 1 of
1. PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE NO. R3-93-2077	4. G-DEP IDENTIFIER
5. BY: (b)(7)(C),(b)(7)(F) AT: Investigator San Francisco, CA			6. FILE TITLE (b)(7)(C)	(7)(C)
7. Closed Requested Action Completed Action Requested By:			8. DATE PREPARED March 2, 1995	
9. OTHER OFFICERS: EPA S/A (b)(7)(C),	(b)(7)(F)			
10. REPORT RE: Alexander SHULG	IN, Chemi	icals dumped	on property (RA40)	
DETAILS: 1. On March 1, 1995, Invest Specialist, Contra Costa Cou investigation of Alexander S warrant was executed on SHUL a DEA Administrative Warrant	igator (b) inty Healt HULGIN, GIN's res	th Services been attachment sidence on 10 g the service	t #1. A criminal /27/94 in conjunct of the warrants S	nting the environmental environmental search tion with the service of SHULGIN stated that he
dumped various chemicals int mercury. Soil samples were of the soil samples was cond GTEL's analysis is attached	taken by ucted by	Hazmat speci GTEL Environ	alists pursuant to	the warrant. Analysis
2. Reference is made to the Specialist (b)(7)(C) docu and that "The Lab results sh the Mercury level was a litt very little money.	menting to	that SHULGIN hazardous was	paid \$3,000 dollar te violations exce	rs to cover Hazmat costs ept for one spot where
3. On March 1995, Investiga (b)(7)(C) regarding possible fed would look into the possibil SHULGIN's property.	eral vio	lations in th	is matter. $S/A_{(7)(F)}^{(b)(7)}$	stated that he
ATTACHMENTS:		John L		
 Hazmat Case File DA Letter 				
INDEXING SECTION: SHULGIN, Alexander - NAD	DIS: 294)(7)(C),(b)(7)(F)		
11. DISTRIBUTION: REGION	12)(/)(C),(b)(/)(F)	-	13. DATE
DISTRICT	14		-	15. DATE
OTHER AMRT, ODOD			r	visor 3/8/95
DEA Form (b)(7) (C)		SENSITIVE MENT ADMINISTRATION		

DEA Form — 6a (C)

REPORT OF INVESTIGATION (Continuation) 4. Page 2 of 3 5. PROGRAM CODE	1. FILE NO. R3-93-2077 3. FILE TITLE (b)(7)(C) 6. DATE PREPARED February 9, 1995
(b)(7)(C) Dr. SHULGIN has information documenting illegal human drug testing	provided the DEA with drug patent g, see attachment #3.
b)(7)(C),(b)(7)(F)	
(b)(7)(C),(b)(7)(F)	

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

REPORT OF INVESTIGATION (Continuation)	1. FILE NO. R 3-93-2077 3. FILE TITLE (b)(7)(C)	2. G-DEP IDENTIFIER (b)(7)(E)
Page 3 of 3		
ROGRAM CODE	6. DATE PREPARED February 9	
FACHMENTS:		
DEA Statement Shulgin (b)(7)(C) drug patent information		
IDEXING SECTION:	500P	· ·
(A) SHOLOTH, ATEXANDET NAMED (C)	207472	
/ · · · · · · · · · · · · · · · · ·		X
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DEA Form - 6a (b)(7) (May 1980) - 6a (C)

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

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I. PROGRAM CO	DE		2. CROSS FILE	RELATED FILES		3-2077	4. G-DEP II (b)(7)(E)	DENTIFIER
	stigator rancisco,	CA		7	6. FILE TIT (b)(7)(C)			
7. Closed 1	Requested Actio	n Completed			8. DATE PR			
Action Reque	The second secon				Febru	ary 6, 199	5	
OTHER OFFICE	RS:							
O. REPORT RE:		of STRL		of Drug Exh	ibits res	ulting fro	m Shulgin	Warrants,
DETAILS:								
l. Referen	nce is mad	e to the	attached	DEA-7's dog	umenting	the result	s of the	DEA Special
				alysis of dr				
Dr. Alexand	ler SHULGI	N's resid	ence/lab	oratory, see	attachme	nt #1.		
			_		(W)			W SHOW
		STRL mem	os summa	rizing drug	analysis	of drug ex	hibits 29	-47, see
attachment	#2.							
3. STRL ar	nalysis of	drug exh	ibits 29	-47 are as f	ollows:			
Exhibit #	Lab #		Act	ive Ingredie	nt_		Drug Sche	dule
29	A1847	No co	ntrolled	substances	detected		None	
30	A1848	Trans	-isoapio	1 (non contro	olled pre	cursor che	mical Sc	h. I
31	A1849			-4-bromopher		e Hcl	Sch. I	
32	A1850	-		dioxyamphetar	mine HCl		Sch. I	
33	A1851		line HCl				Sch. I	
34	A1852		line Sul			ė.	Sch. I	
35	A1853			dioxyampheta	nine HC1		Sch. I	
36	A1854		line HC1	1 1			Sch. I	
37	A1855		line HC1				Sch. I	
38	A1856			dioxymethamil				*
39	A1857			dioxymethampl				
40	A1858			dioxymethampl	netamine		Sch. I	
41	A1859			ne HC1 (PCP)			Sch. I	
42	A 1060			ne HCl (PCP)	77.71		Sch. I	
42	A1960 A1861			l and Ephedri			None	
44	A1862			dioxyamphetar			None Sch. I	
45	A1863			dioxymethamph			Sch. I	
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REPORT OF INVESTIGATION (Continuation) 4. Page 2 of 2 5. PROGRAM CODE	1. FILE NO. R3-93-2077 3. FILE TITLE (b)(7)(C) 6. DATE PREPARED February 6, 1995
Methorphan HCl 46 Al864 Psilocin and Psilocybin 47A Al865 d-methamphetamine (Salt Fo 47B d-methamphetamine (Salt Fo 4. During the on-site investigation of Dr. SHULGI produce manufacturing or receipt records for the d	rm Not Determined) Sch. I N's residence/laboratory, he failed to
ATTACHMENTS: 1. DEA-7's 2. STRL Memos INDEXING SECTION: 1. SHULGIN, Alexander - NADDIS: 294983	

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

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

REPORT OF INVESTIG	SATION		I	age 1 of 1
PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE NO.	4. G-DEP IDENTIFIER
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AT: Investigator	Н		I N. A. 7	
San Francisco, CA				
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Action Requested By:			January 31, 1	995
OTHER OFFICERS:	-		1	
O. REPORT RE: Meeting with AUGA	(b)(7)(C)	(7):46		
O. REPORT RE: Meeting with AUSA	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	(PM40		j j
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AUSA has stated t	1 1	.1.		
	nor cho	16 also inte	rested in prosecu	iting Dr. Alexander
has stated t	nat sie	5 .1 .00		
has stated to the harmonic (NADDIS: 294983) for v	iolatio	ns of the CSA		Mon
SHULGINA(NADDIS: 294983) for v	iolation	ns of the CSA		JUNION NO.
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GHULGINA(NADDIS: 294983) for v	riolation	of the CSA	•	of the same of the
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INDEXING SECTION: (b)(7)(C)	riolation	as of the CSA	•	
INDEXING SECTION: (b)(7)(C)	riolation	as of the CSA	•	
INDEXING SECTION: (b)(7)(C) 2. SHULGIN, Alexander - NADDI	riolation	as of the CSA	•	
SHYLGINA(NADDIS: 294983) for v INDEXING SECTION:	riolation	as of the CSA		
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BY: (b)(7)(C),(b)(7)(F) AT: Investigator San Francisco, CA	2. CROSS FILE	RELATED FILES	3. FILE NO.	4 G.DEP	
AT: Investigator			R3-93-2077	(b)(7)(E)	DENTIFIER
		-95-0024	6. FILE TITLE (b)(7)(C)		
. Closed Requested Action Completed			8. DATE PREPAREI		
Action Requested By: OTHER OFFICERS: TFA (b)(7)(C),(b)(7)(F)			January 31	, 1993	
O. REPORT RE: Peyote Cactus Se: Exhibits 1-6, Ca			's Residence		
MARIDICO I O, Od.	00 #200 2		Annual des et estado en la colonida estado estado estado en estado en estado en estado en estado en estado en e		
DETAILS:					
On October 27, 1994, during the SFFD Diversion Unit and Consult and Conference CA, 2000 Case file R3-95-0024.	lan Lak	Unit at Dr. \$	HULGIN's resi	e Inspection V dence/laborate ctus, as drug	ory, 1483
Reference is made to the a exhibits 1-6, case #R3-95-002					
ATTACHMENTS:					
. Copies of DEA-7's, Exhibit	ts 1-6				
INDEXING SECTION:					
AHULGIN, Alexander - NADD	IS 2949	83			
					•
; ? () a.					
, 2		, (t)	¥		
REGION (b)(7)(C)	(b)(7)(C),(b)(7)(F)			13. DATE 2/7/85
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REPORT OF INVESTI	GATION			Page 1 of
. PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE NO.	4. G-DEP IDENTIFIER
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AT: Investigator		^ -	(b)(7)(C)	-
San Francisco, CA	lä	H	(
				1
7. Closed Requested Action Completed			8. DATE PREPARED	
Action Requested By: Milwaukee R. O. OTHER OFFICERS:	0.		January 25, 1	.995
Dr. SHULGIN purch	ase of 1	10gram of Pre	cursor to Sched	ule I(2CB)(RA40)
ETAILS:		/		
7/52	(7)(C)			
0n January 19, 1995, G/S (b)	(/)(U)	Milwau	kee, WI Field I	Division contacted D/I
^{(b)(7)(F)} and reported a suspiciou HULGIN DBA Alexander Shulgin	Research	Inst. 1/83	Shulgin Road I	ne 9/% by Alexander
wooth bon nickander phuigin	Research	111000, 1403	PHOTESTH ROAD, I	datayette, the
cct. # Order #	Drug		Qty Shipped	Date
2007 50501/ 0.5.1			87	01/07/05
3987 595214 2,5-Dimeth 770368	oxyphene	thylamine, 97	_	01/27/93
770300	-	F)/7)/0)//k)	100gm	06/04/93
. On January 19, 1995, Inves		b)(7)(C),(b) 7)(F) contact	ed STRL Chemist	(b)(7)(C) who advised
hat 2,5 Dimethoxyphenethylami		precursor to	schedule I 4-Br	como-2,5
imethoxyphenethylamine (2CB).			hat 100 grams o	
imethoxyphenethylamine could	conse rva	tively yield	80-90 grams of	2CB using Bromine and
cetic acid. Reference is mad	le to DEA	ROI dated No	vember 3, 1994,	same file number and
itle as this report, Re: Seco HULGIN-Analytical Laboratory,	nd Admin	occieic Days	pection Warrant	(10/2//94), Alexander
orug Exhibit #4 as 2,5 Dimetho	VV-4-hro	monhenethylam	ine UCI (Schedu	Le T 2CR) When exhibit
4 was taken from Dr. SHULGIN'	s lab on	01/27/94. Dr	. Shulgin had 3	3.42 grams of (2CB)on
and that SHULGIN said he manu	factured	to research	the effect of 2	CB on receptor cites in
ats and ultimately on humans	for trea	ting mental i	llness. Dr. SH	ULGIN stated that he
ynthesized approximately 10 g	rams of	20B in the $1a$	st; two years.	Dr. SHULGIN stated that
e did not have records to doc	ument th		C 0.00 T. 1	ould be maked that Do
WHOTH had have records to doe	Acres 1	e manuracture	of 2CB. It sh	iould be noted that Dr.
HULGIN had his DEA Schedule I	researc	h registratio	n revoked by DE	A in 1977.
HULGIN had his DEA Schedule I	researc	h registratio	n revoked by DE	A in 1977.
HULGIN had his DEA Schedule I Reference is made to Dr. S	researc	h registratio	n revoked by DE book that indi	A in 1977.
HULGIN had his DEA Schedule I Reference is made to Dr. S urchase of 100 grams of 2,5 D he log entry indicates "CALL	HULGIN's imethoxy	purchase log	n revoked by DE book that indi e noted in sect rding Aldrich p	cates the Aldrich ion 1 of this report.
HULGIN had his DEA Schedule I Reference is made to Dr. S urchase of 100 grams of 2,5 D he log entry indicates "CALL hemical. See attached copy o	HULGIN's imethoxy from (b)(7)(df Dr., SH)	purchase log phenethylamin rega	n revoked by DE book that indi e noted in sect rding Aldrich p	cates the Aldrich ion l of this report. ourchase for subject
HULGIN had his DEA Schedule I Reference is made to Dr. S urchase of 100 grams of 2,5 D he log entry indicates "CALL hemical. See attached copy o	HULGIN's imethoxy from (b)(7)(df Dr., SH)	purchase log	n revoked by DE book that indi e noted in sect rding Aldrich p	cates the Aldrich ion l of this report.
HULGIN had his DEA Schedule I Reference is made to Dr. S urchase of 100 grams of 2,5 D he log entry indicates "CALL hemical. See attached copy o I. DISTRIBUTION: Milwaukee R.O.	HULGIN's imethoxy from (b)(7)(df Dr., SH)	purchase log phenethylamin rega	n revoked by DE book that indi e noted in sect rding Aldrich p	cates the Aldrich ion l of this report. ourchase for subject
HULGIN had his DEA Schedule I Reference is made to Dr. S urchase of 100 grams of 2,5 D he log entry indicates "CALL hemical. See attached copy of the log of the log entry indicates attached copy of th	HULGIN's imethoxy from (b)(7)(df Dr., SH)	purchase log phenethylamin rega	n revoked by DE book that indi e noted in sect rding Aldrich p	cates the Aldrich ion 1 of this report. curchase for subject ttachment #2.

REPORT OF INVESTIGATION	1. FILE NO. R3-93-2077 3. FILE TITLE	2. G-DEP IDENTIFIER (b)(7)(E)
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Page $_2$ of $_2$		
5. PROGRAM CODE	6. DATE PREPARED	1005
	January 25,	1993
7)(C),(b)(7)(F)		<u> </u>
5. Based on the above, the DEA SFFI requests	complete sales infor	mation from Aldrich by
ATT ACTRICATED.		
ATTACHMENTS:		
1. Aldrich Chemical Purchase Record 2. Dr. Shulgin Logbook Entries		
INDEXING SECTION:		
An annual control of the control of		
1.A SHULGIN, Alexander - NADDIS: 294983	7	
Aldrich Chemical - NADDIS: 665089	_	
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DEA Form — **6a** (b)(7)(C)

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

	REPORT	OF INVESTI	GATION	1 2		Page 1	of 2	
. PROGRAM	CODE		2. CROSS FILE	RELATED FILES	3. FILE NO.		4. G-DEP IDE	NTIFIER
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	Francisco,	CA						
Dan .	lancisco,	OA	l U					
	7.				8. DATE PREPARE			
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OTHER OFF					January 24,	1993		
. OTHER OFF	ICENS.							
O. REPORT R	E: Results Drug Ext	of STRL Andibits 1-28	nalysis (RA40)	of Drug Exhib	its resulting	from Sh	ulgin Wa	rrants,
TAILS:				/				
D - f			. 1	/		-		
Kelerei	ice is made	to the at	tached	PA-7's docum	enting the re	sults of	the DEA	Special
sting Res	search Labo	pratory (SI	RL) Anal	ysis of drug	exhibits tak	en durin	g the Wa	rrants at
. Alexand	ier ShulGi	's resider	ice/labor	ratory.				
Con att	ached DEA	CMD1			1			
see att	ached DEA	SIKL memos	s summarı	zing drug an	alysis of dru	g exhibi	ts 1-28.	
hibit #	Tob #		A - 4- 3	7 11		_		
ITUIC W	Lab #		ACLIV	e Ingredient		Drug	Schedul	e
1	A1819	2 5-dim	othors /		-1	G 1	- 1	
2	A1820			-iodophenethy			I Analo	
3	A1821			oxyephedrone			I Analo	g
4	A1822	2,4 Met	nyleneal	oxymethamphet	emine base	Sch.		
5	A1823	2,5-1111	ethoxy-4	-bromophenetl	lyramine HCI	Sch.		
6	A1824	3 A-Mot	hylonodi	ethylenedioxy oxyamphetam:	amphetamine			g
7	A1825	N-Mothy	Tag Aallo	thy long diamet	ie tartrate	Sch.		
8	A1826	3 A-Mot	hylonodi	thylenedioxya oxyamphetamin	umpheramine H			
9	A1827	N=(2-Mo	thornoth	(y, 1) = 3, 4, methy	ie HCI	Sch.		
	RIOZI	dioxyon	photomin	e hydrochlori	rene-	Scn.	I Analog	g
10a,b,	A1828			oxymethamphet		0.1	-	
l,f,g	111020	J, 4 Het	HATCHEAL	6 KAMBE Hambuer	Samine uci	Sch.	1	
10c,e		2 5-Dim	athovu-/	-promopheneth	vilamina IIC1	0 - 1-	7	
11	A1829	NNDD	770	M 3 mobile rest	ly ramine HCI	Sch.	1	
12	A1830			oxymethamphet	orino UC1	None	7	
13	A1831	3 4-Met	hylenedi	oxymethamphet	anine noi	Sch.		
14	A1832	delta-9	-Tet rahv	drocannabinol	aurile noi	Sch.		
15	A1833			oxymethamphet		Sch.		
16a	A1834	3.4-Met	hylenedi	oxymethamphetoxic	authe benzil			
16b		3.4-Met	hylenedi	oxymethamphet	amine UC1	Sch.		
17	A1835	2,5-Dim	ethoxy-4	-bromopheneth	vlamino	Sch.		
	ONChief Co	uncol	(b)(7)	(C),(b)(7)(F)) Taki de	ocn.	1	T
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5. PROGRAM	CODE		19	January 18,	1005	
				January 10,	1995	-
		(Salt Not Determin	ed)			
18	A1836	Mescaline HCl			Sch. I	
19	A1837	3,4-Methylenedioxy	amphetamin	ne HC1	Sch. I	
20	A1838	Mescaline HCl			Sch. I	
21	A1839	3,4-Methylenedioxy	methamphet	amine HCl	Sch. I	
2.2	A1840	3,4-Methylenedioxy	ethylamphe	etamine HCl	Sch. I	
23	A1841	Mescaline HCl			Sch. I	
24	A1842	2,5-Dimethoxy-4-br		nylamine	Sch. I	
		(Salt Not Determin				
25	A1843	3,4-Methylenedioxy	methamphet	amine HCl	Sch. I	
26	A1844	Mescaline Sulfate			Sch. I	
27	A1845	2,5-Dimethoxy-br			Sch. I	
28	A1846	3,4-Methylenedicxy	methamphet	amine HCl	Sch. I	
3 Duna	ng the en-of	to investigation of Dr	CHILL CAN	he failed to	nroduce manufacturing	2 2-
		drug exhibits 1-28.	· SHULGIN,	, he latted to	produce manufacturing of) [
receipt	records 101	did exhibits 1-20.	1			
ATTACHME	NTS:					
1. DEA-	7's					
2. STRL	Memos					
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IMPEXING	SECTION:		Į.			
X						
1. SHUL	GIN, Alexand	er - NADDIS: 294983				
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DEA Form (May 1980) - 6a (C)

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

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Action Requested By:				December 29, 199)4
OTHER OFFICERS:					
. REPORT RE:					
xander SHULGIN's	reported co	ontrolled	substances	inventory as of 11	/31/94 (RA40)
AILS:					
3179:					
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where SHULGIN m	aintains his	residen	ce and chemi	al laboratory, DE	A registration
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				sidence and labora	tory and inventory
controlled subs	tances in hi	s posses	sion.		
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REPORT	OF INVESTIGATION	ON	R3-93-20	077	(b)(7)(E)	
			3. FILE TITLE			
	(Continuation)		(b)(7)(C)			
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	2		6. DATE PREPA	ARED		
5. PROGRAM CODE				er 31, 199	4	
		[/-//7//0)				
Midazolam	C-IV	(b)(7)(C)		10 mg		
Pentobarbital	C-II	?		2 g.		
	C-IV	?		2 g.		
Phenobarbital	C-II	Sigma		25 g.		
Secobarbital		?		2 g.		
Secobarbital	C-II	ATS		3 g.		
2C-B	C-I	(b)(7)(C)	71	100 mg		
MDA	C-I		⊿	25 g.		
MMDA-2	C-I	ATS		25 8	•	
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any of the surrence	dered items. The	surrendered	drugs were fo	orwarded to	o the DEA S'	TRL for
analysis.	deleg records					
		(b)(7)(C),	i			
3. On November 10	1994 Investig	ator (b)(7)(F) te	lephonically	contacted	Alexander	SHULGIN at
	salend him to pro	wide receint	racords lor	THE COULT	TTEN DUDDEN	ileco aloce
in his October 31	asked him to pro	Alexander	SHULGIN replie	ed that he	has retain	ed Lawyer
in his October 31 (b)(7)(C)	, 1994 Inventory	and that all	future quest	ions shoul	d be direct	ed to his
	1 10 100/	1 + (b)(7)(C)(b)	material to con	tact attor	nev (b)(/)(c)	and
attorney. On Nove left a message wi	ember 10, 1994, 1	(7)(F)	(b)(7)(C)	contacted	D/T (b)(7)(C),(b) a	nd stated
left a message wi	th his office.	subsequently,	1 tubetence P	ogulations	hefore res	nonding to
that he would have	e to review Fede	ral Controlled	a substance K	egulations	20 1994	neither
DEA's request for	controlled subst	ance receipt	records. As	or becemb	er 25, 1554	thic
(b)(7)(C) or A1	exander SHULGIN	nas contacted	the SFFD Div	ersion uni	t regarding	LIIIS
matter.						
ATTACHMENTS:						
1. SHULGIN's Con	trolled Substanc	e Inventory as	s of October	31, 1994		
INDEXING SECTION:						
ATT.						
1 SHILGIN Alex	ander - NADDIS:	294983				
I. Phoromy, wiev	minut inibia.					

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

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

REPORT OF INVEST	IGATION			Page 1 of 2
PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE NO. R3-93-2077	4. G-DEP IDENTIFIER
BY : (b)(7)(C),(b)(7)(F)	1		6. FILE TITLE	(b)(7)(C)
AT: Investigator		N x1	(b)(7)(C)	(b)(7)(c)
San Francisco, CA		44	and the second	
bull Fibricia of on				
Closed Requested Action Completed	1 2		8. DATE PREPARED	
			November 18,	1994
Action Requested By: OTHER OFFICERS:				
REPORT RE: Use of Internet Co	omputer	System by Dr.	SHULGIN and ot	hers to communicate
drug information a				
AATT O		/		
CAILS:		/		
Reference is made to all p	mion DOT	la undon this	file number an	d title regarding a
Int DEA, State and Local inv				
unauthorized use and manufa	clure of	schedule 1 Co	mrioirea subst	ances and their analoge
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On October 27, 1994, the D				
of the special festing				
ice, Sheriffs Department, F				
wing a DFA Administrative To	nemontin			
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s enforcement effort reveals dedule I controlled substance in chemicals including mercal event to be involved in ille on October 28, 1994, DEA Datinued its inspection of Dr. in the Internet Computer System. Dr. SHULGIN provided the investigators regarding numerous powders found in Dr. SHULGE in the internet System. Dr. SHULGIN stated that he has the last year, Dr. SHULGIN also ited that his associate in Grammarket. Dr. SHULGIN stated	ed that es, fail ury into egal hum iversion SHULGI tem to o 2CB) and nformati us suspe IN's res ternet receive o receive emany heed that	SHULGIN was it ed to maintain the ground or an drug testin with assistan N's DEA regist btain and ana other drugs. on regarding cted controlle idence. Dr. 2 anonymous sound d schedule I 2 ed samples of as stated that	llegally manufactor required recommends and leadyze foreign and Dr. SHULGIN related substances in SHULGIN stated roces and associated from E. Get 2CB from E. Get 2CB is flooding	cturing and researching rds and disposed of SHULGIN is also FD Clan Lab Group rned that Dr. SHULGIN d domestic samples of eported his analysis vint to questions by ncluding pills, capsule that he received these ates who Dr. SHULGIN m South Africa. Within rmany. Dr. SHULGIN ng the German illicit
on October 28, 1994, DEA Datinued its inspection of Draditional Theorem and the Internet Computer System. Dr. SHULGIN provided the investigators regarding numerous powders found in Dr. SHULGIN in SHULGIN in Shulf in Sh	ed that es, fail ury into egal hum iversion SHULGI tem to o 2CB) and nformati us suspe IN's res ternet receive o receive emany heed that	shuldin was it ed to maintain the ground or an drug testin with assistan N's DEA regist btain and anal other drugs. on regarding ted controlle idence. Dr. 2 anonymous sound d schedule I 2 ed samples of as stated that he examined the	llegally manufactor required recommends and leadyze foreign and Dr. SHULGIN related substances in SHULGIN stated roces and associated from E. Get 2CB from E. Get 2CB is flooding	cturing and researching rds and disposed of SHULGIN is also FD Clan Lab Group rned that Dr. SHULGIN d domestic samples of eported his analysis vint to questions by ncluding pills, capsule that he received these ates who Dr. SHULGIN m South Africa. Within rmany. Dr. SHULGIN ng the German illicit rom Germany and
on October 28, 1994, DEA Ditinued its inspection of Dred the Internet Computer System. Dr. SHULGIN provided the investigators regarding numerous powders found in Dr. SHULGIN stated that he last year, Dr. SHULGIN also that his associate in Going market. Dr. SHULGIN stated that he last year, Dr. SHULGIN stated that he last year, Dr. SHULGIN stated that his associate in Going market. Dr. SHULGIN stated that he last year, Dr. SHULGIN stated that his associate in Going market.	ed that es, fail ury into egal hum iversion SHULGI tem to o 2CB) and nformati us suspe IN's res ternet receive o receive emany heed that	shuldin was it ed to maintain the ground or an drug testin with assistan N's DEA regist btain and anal other drugs. on regarding ted controlle idence. Dr. 2 anonymous sound d schedule I 2 ed samples of as stated that he examined the	llegally manufactor required recommends and leadyze foreign and Dr. SHULGIN related substances in SHULGIN stated roces and associated from E. Get 2CB from E. Get 2CB is flooding	cturing and researching rds and disposed of SHULGIN is also FD Clan Lab Group rned that Dr. SHULGIN d domestic samples of eported his analysis vint to questions by ncluding pills, capsule that he received these ates who Dr. SHULGIN m South Africa. Within rmany. Dr. SHULGIN ng the German illicit rom Germany and
s enforcement effort reveals dedule I controlled substance in chemicals including mercicle in the second of the controlled substance in the second in the se	ed that es, fail ury into egal hum iversion SHULGI tem to o 2CB) and nformati us suspe IN's res ternet receive o receive emany heed that	shuldin was it ed to maintain the ground or an drug testin with assistan N's DEA regist btain and anal other drugs. on regarding ted controlle idence. Dr. 2 anonymous sound d schedule I 2 ed samples of as stated that he examined the	llegally manufactor required recommendates and leadyze foreign and Dr. SHULGIN related substances in SHULGIN stated roces and associated from E. Get 2CB is flooding 2CB sample for the sample of the	cturing and researching rds and disposed of SHULGIN is also FD Clan Lab Group rned that Dr. SHULGIN d domestic samples of eported his analysis vint to questions by ncluding pills, capsule that he received these ates who Dr. SHULGIN m South Africa. Within rmany. Dr. SHULGIN ng the German illicit rom Germany and
s enforcement effort reveals dedule I controlled substance dic chemicals including merce dieved to be involved in ille On October 28, 1994, DEA De dinued its inspection of Dr ded the Internet Computer System Dr. SHULGIN provided the investigators regarding numerous powders found in Dr. SHULG ms from contacts through Investigators remains numerous powders found in Dr. SHULG ms from contacts through Investigators fused to identify. Dr. SHULGIN stated that he e last year, Dr. SHULGIN also detected that his associate in Go mg market. Dr. SHULGIN state DISTRIBUTION: REGION	ed that es, fail ury into egal hum iversion SHULGI tem to o 2CB) and nformati us suspe IN's res ternet receive o receive emany heed that	shuldin was it ed to maintain the ground or an drug testin with assistan N's DEA regist btain and anal other drugs. on regarding cted controlle idence. Dr. 2 anonymous sound d schedule I 2 ed samples of as stated that he examined the	llegally manufactor required recommendates and leadyze foreign and Dr. SHULGIN related substances in SHULGIN stated roces and associated from E. Get 2CB is flooding 2CB sample for the sample of the	cturing and researching rds and disposed of SHULGIN is also FD Clan Lab Group rned that Dr. SHULGIN d domestic samples of eported his analysis vint to questions by ncluding pills, capsule that he received these ates who Dr. SHULGIN m South Africa. Within rmany. Dr. SHULGIN ng the German illicit rom Germany and

REPORT OF INVESTIGATION (Continuation)	1. FILE NO. R 3-93-2077 3. FILE TITLE (b)(7)(C)	2. G-DEP IDENT(FIER (b)(7)(E)
Page 2 of 2	1	
5. PROGRAM CODE	6. DATE PREPARED November 18, 19	94
responded to his associate in Germany via Internet manufactured in South Africa. Several suspected samples were collected from Dr. SHULGIN and forward Dr. SHULGIN did not maintain records on these subsand title as this report, dated 11/10/94 re: Continspection Warrant. 6. Dr. SHULGIN also stated that he has received a aka "Disco Biscuit" and "DXM" from Seattle, Washir ingredient in over the counter cough syrup. Dr. Source through Internet and reported his drug anal. 7. Dr. SHULGIN stated that he communicates on Intalt.drugs. Dr. SHULGIN stated that there are some system per day and at one time ten references to " 8. On November 1, 1994, the DEA accessed the Internet.drugs". This computer file contains extensive of controlled substances. The file also contains making e-mail contacts. The file appears to be mathemself as (D)(7)(C) SHULGIN's residence were also reported on Internet copies of excerpts from Internet, attachment #1).	amples of 2CB and n ded to Special Test tances. See DEA RO nuation of Second A nd analyzed samples gton. Dextromethor HULGIN made contact ysis through Internernet using the com times 200 drug rela Nexus" per day. rnet System and exee material regardin instructions for ponaged by an individ The DEA and	umerous other drug ing for analysis. I, same file number dministrative of Dextromethorphan phan is the active with the Seattle et. puter command: ted entries in this cuted the command g the manufacturing sting information and ual identifying State Warrants on
ATTACHMENTS:		
1. Excerpts from Internet		
INDEXING SECTION:	(b)(7)(C)	1
1. SHULGIN, Alexander - NADDIS: 294983 2. (b)(7)(C)		

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

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

	GATION			Page 1 of 3
. PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE NO. R3-93-2077	4. G-DEP IDENTIFIER
· BY: (b)(7)(C),(b)(7)(F)		÷.^	6. FILE TITLE	
AT: Investigator		17X	(b)(7)(C)	(b)(7)(C)
San Francisco, CA				35
Closed Requested Action Completed			8. DATE PREPARED	1
Action Requested By:	U		November 14,	1994
OTHER OFFICERS:			1	
O. REPORT RE: Request for Order (Analytical Lab, D				GIN
(surely surely s		7	100 1 1/	
NOPSIS:				
WESTS.				
coratory/residence based on high Times Article, August 94) A. The DEA inspections and somethorized Schedule I research for a second and destruction research for also participated in a solving possible environmental DLGIN is also believed to be corney (b)(7)(C) has been a processing. CAILS:	and a rubsequent hand factords. be in il State Clart violat	review of Dr. at investigation investigation in the October of the	SHULGIN's violons reveal that ain controlled er 27, 1994 in ion of Schedul h Warrant of Evestigation is uman drug test	ative history with the at SHULGIN is conducting a substance receipt, aspection by the DEA, le I Peyote plants. The or. SHULGIN's residence ongoing. Alexander
		1		
The continued registration redules I-V, 1483 Shulgin Roa	d, Lafay	ette, CA 9454	9), is inconsi	b, DEA #PS0061616, stent with the public
The continued registration nedules I-V, 1483 Shulgin Roaterest as defined in 21 USC 8 A. On October 27, 1994, Al Schedule I Peyote (drug continued)	d, Lafay 23 and 8 exander	ette, CA 9454 24 based on t SHULGIN was f	9), is inconsi he following:	stent with the public
The continued registration redules I-V, 1483 Shulgin Roaderest as defined in 21 USC 8. A. On October 27, 1994, Al Schedule I Peyote (drug consequence) See attached DEA ROI, File 1994 (see attachment #1). [peyote was a gift from a mean of the second reduced peyote was a gift from a mean of the second reduced peyote was a gift from a mean of the second reduced peyote was a gift from a mean of the second reduced peyote was a gift from a mean of the second reduced peyote was a gift from a mean of the second reduced peyote was a gift from a mean of the second reduced peyote was a gift from a mean of the second reduced peyote was a gift from a mean of the second reduced peyote was a gift from a mean of the second reduced peyote peyote was a gift from a mean of the second reduced peyote peyote was a gift from a mean of the second reduced peyote peyote was a gift from a mean of the second reduced peyote p	d, Lafay 23 and 8 exander de 7415) #R3-95- (b)(7)(C) ember of	SHULGIN was f , in violatio	9), is inconsi he following: ound to be in n of 21 USC 84 Alexander SHUL Alexander SHU merican Church	illegal possession of l(a)(1). GIN, Dated: November 1, LGIN, stated that the The Peyote was seize
The continued registration redules I-V, 1483 Shulgin Roaderest as defined in 21 USC 8. A. On October 27, 1994, Al Schedule I Peyote (drug consequence) See attached DEA ROI, File 1994 (see attachment #1). [peyote was a gift from a manage of the consequence] by TFA Agent [0)(7)(C),(b)(7)(F)	d, Lafay 23 and 8 exander de 7415) #R3-495- (b)(7)(C) ember of A decis	SHULGIN was f , in violatio	9), is inconsi he following: ound to be in n of 21 USC 84 Alexander SHUL Alexander SHU	illegal possession of l(a)(1). GIN, Dated: November 1, LGIN, stated that the The Peyote was seizeng.
The continued registration redules I-V, 1483 Shulgin Roaderest as defined in 21 USC 8. A. On October 27, 1994, Al Schedule I Peyote (drug consequence) See attached DEA ROI, File 1994 (see attachment #1). [peyote was a gift from a methy TFA Agent [b)(7)(C),(b)(7)(F)	d, Lafay 23 and 8 exander de 7415) #R3-495- (b)(7)(C) ember of A decis	SHULGIN was f , in violatio 0024, Title: the Native A	9), is inconsi he following: ound to be in n of 21 USC 84 Alexander SHUL Alexander SHU merican Church	illegal possession of l(a)(1). GIN, Dated: November 1, LGIN, stated that the The Peyote was seize
The continued registration redules I-V, 1483 Shulgin Roaderest as defined in 21 USC 8. A. On October 27, 1994, Al Schedule I Peyote (drug consequence) See attached DEA ROI, File 1994 (see attachment #1). [peyote was a gift from a methy TFA Agent (b)(7)(C),(b)(7)(F). DISTRIBUTION Chief Counsel	d, Lafay 23 and 8 exander de 7415) #R3-495- (b)(7)(C) ember of A decis	SHULGIN was f , in violatio 0024, Title: the Native A	9), is inconsi he following: ound to be in n of 21 USC 84 Alexander SHUL Alexander SHU merican Church	illegal possession of l(a)(1). GIN, Dated: November 1, LGIN, stated that the The Peyote was seizeng.
The continued registration redules I-V, 1483 Shulgin Roaderest as defined in 21 USC 8. A. On October 27, 1994, Al Schedule I Peyote (drug consequence) See attached DEA ROI, File 1994 (see attachment #1). [peyote was a gift from a moby TFA Agent (b)(7)(C),(b)(7)(F) DISTRIBUTION Chief Counsel REGION (b)(7)(C)	d, Lafay 23 and 8 exander de 7415) #R3-495- (b)(7)(C) ember of A decis	SHULGIN was f , in violatio 0024, Title: the Native A	9), is inconsi he following: ound to be in n of 21 USC 84 Alexander SHUL Alexander SHU merican Church	illegal possession of 1(a)(1). GIN, Dated: November 1, LGIN, stated that the . The Peyote was seizeng.

DRUG ENFORCEMENT ADMINISTRATION

	1. FILE NO.	2. G-DEP IDENTIFIER
REPORT OF INVESTIGATION	R3-93-2077	(b)(7)(E)
(Continuation)	3. FILE TITLE	
(Continuation)	(b)(7)(C)	
Page 2 of 3		
RAM CODE	6. DATE PREPARED	4
	November 14	, 1994
B. On September 27, 1994 and October 27,	1994, Alexander SHU	LCIN was found to be
conducting Schedule I Research not author	rized by his analytic	cal lab registration i
violation of 21 CFR 1301.22(b)(3).		
DEA TOTAL OF DESCRIPTION	Ila laboratory/resid	ence Dr SHULGIN stat
During the DEA Inspections of Dr. SHULGINg that he has conducted and was currently of	conducting research	with Schedule I
controlled substances and their analogs,	specifically 2CB AK	A Nexus, Methcathinone
and MDMA. Dr. SHULGIN was researching th	nese compounds for u	se in treating mental
illness. See DEA ROI's file title (b)(7)(C)	, Case #R3	-93-2077, Re:
Administrative Inspections of Alexander S	GHULGIN (see attachm	ent #2).
1		
C. Alexander SHULGIN did not maintain con	trolled substance r	eceipt, manufacturing
destruction records as required by 21 CFF	(1304.27 III VIOLACI	on of 21 030 042(a)(3)
Alexander SHULGIN failed to maintain reco	ords documenting his	manufacture of Schedu
I 2CB-"Nexus", MDMA, LSD, MDA and MMDA-2.	Alexander SHULGIN	also failed to docume
samples of controlled substances he recei	ived from associates	and anonymous
individuals. See DEA ROI, Case #13-93-20	077 title (b)(/)(C)	, Re:
Administrative Inspection Warrants, Alexa	ander SHULGIN, (see	attachment #2).
D. Alexander SHULGIN conducted unauthoriz	zed human drug resea	rch in violation of st
and federal food and drug laws.		
On October 27, 1994, Dr. SHULGIN voluntar	rily supplied DEA wi	th what he called a
patent titled "Information concerning the	e invention of a new	antidepressant" (see
attachment #3). According to SHULGIN, th	nis document discuss	es the use of Schedule
methcathinone to create a methcathinone a		
discussed. The individuals reportedly ha		
	b)(7)(C)	
Alexander SHULGIN has failed to get Inves	stigational New Drug	(IND) Authority from
FDA as required by Title 21 Part 312. A		
information has been submitted to (b)(7)(C)	(b)/	torney, Neurobiologica
Technologies Inc., 1440 Regatta Blvd., R	Temmond, GA 94004	
E. Alexander SHULCIN has a violative his	tory 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

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

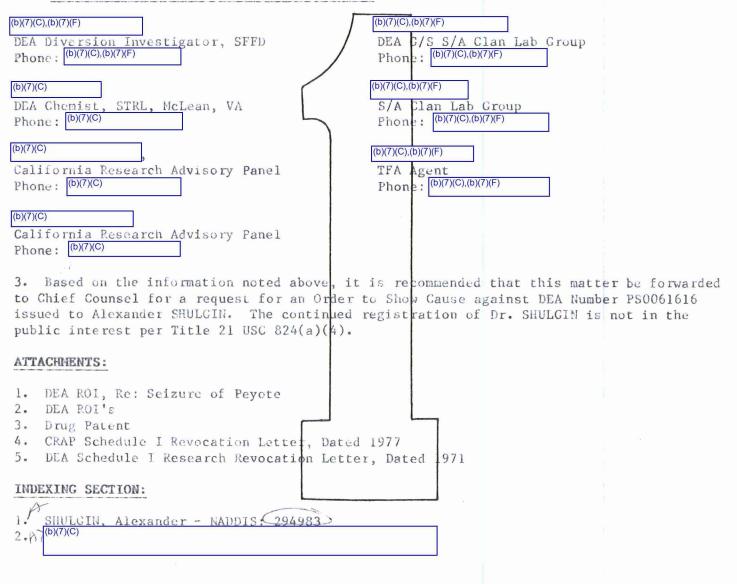
DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

REPORT OF INVESTIGATION	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
(Continuation)	3. FILE TITLE (b)(7)(C)	
. Page 3 of 3		1
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	November 14,	1994

registration, DEA number PS0026206 (see attachment #5). No action was taken against his Schedule 1-V Analytical Lab Registration.

2. Possible witnesses in this matter:



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

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

	GATION			Page 1 of	6
PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE NO. R3-93-2077	(b)(7)(E)
(b)(7)(C),(b)(7)(F) BY: Investigator San Francisco, CA	00000	X	6. FILE TITLE (b)(7)(C)	(b)(7)(C)	
Closed Requested Action Completed Action Requested By: OTHER OFFICERS: S/A (b)(7)(C),(b)(7)(F)		e F	8. DATE PREPARE November 10		
REPORT RE: Continuation of Se Analytical Laborat	cond Adr	ministrative I	nspection Wa xhibits 17-4	rrant, Alex	ander SHULGIN,
4	, , , , , ,				
OPSIS:		/			
ayette, CA 94549. On Signature, the DEA executed LGIN's laboratory/reside arch in Hallucinogens SHULGIN's violative his sequent investigations and leading and destruct the DEA, Alexander SHULGIN arender of samples of signature the mail. Dr. SHULGIN occased drug exhibits we walls:	d Admindence be (High lstory reveal ailed to read to This aspect falled	istrative I ased on his Times Artic with the DL that SHULG o maintain cords. On s found to report docucontrolled to keep re	nspections public st le August A. The in IN is conductorolled the Octobe be in ille ments the substances cords on t	of Alexa atements 94) and a spections ucting un substanc r 27, 199 gal posse collectio Dr. SHUL hese subs	nder regarding review of and authorized es receipt, 4 inspection ssion of n and GIN received
Reference is made to DEA RO 1994, re: Second Administrate eratory, 10/27/94.					
This report documents second Administrative xander SHULGIN, Analytilgin Road, Lafayette, (Inspec cal La	tion Warran b, DEA #PSO	t initiate	d on 10/2	7/94 of
1	(b	v)(7)(C),(b)(7)(F)			
DISTRIBUTION: (b)(7)(C)	11				
REGION OFR /24 (b)(7)(C)					13. DATE
					13. DATE

	1. FILE NO.	2. G-DEP IDENTIFIER
REPORT OF INVESTIGATION	R3-93-2077	(b)(7)(E)
(Continuation)	3. FILE TITLE	
	(b)(7)(C)	
Page of 6		
5. PROGRAM CODE	6. DATE PREPARED	
	November 10, 199	4
3. On October 31, 1994 at approximately met with Dr. SHULGIN at his residence inspection of Dr. SHULGIN's registration.	10:00a.m., D/I (7)(F) ce/laboratory to c	and S/A (F) and S/A (F)
inspection of Dr. Shotoin's registration.		
4. On the October 27, 1994 inspection, DEA Invest identified as anonymous samples suspected to be croom located in the rear of Dr. SHULGIN's resident Basement #4 (see DEA ROI noted in section one of did not have any records documenting the receipt D/I (b)(7)(C), asked Dr. SHULGIN to collect and inventor in Basement #4. On October 31, 1994, Dr. SHULGIN (attachment #1). Dr. SHULGIN voluntarily surrende inventory to D/I (b)(7)(C),(b) (see attached DEA 12, attached below is Dr. SHULGIN's inventory number and	ontrolled substances are. Dr. SHULGIN identifies report paragraph of these samples. On pry all suspected congave D/I((D)(T)(C),(D)) a copy red the suspect drugs thment #2). Next to	scattered around a tified this room as #9). Dr. SHULGIN October 27, 1994, trolled substances y of this inventory, s noted on the each exhibit number
Exhibits 17-47		
EXHIBIT #17 (22212)		
My writing -"HCL salt MLS-2CB" residues from lab	or IR. Probably cont	ains 2CB.
EXHIBIT #18 (22226)		
Blue-line ziplock a couple hundred mg chunk of ha "Orange Texas Hydrochloride "Rock" no idea who or		ontains label saying
EXHIBIT #19 (22219)		
5x5cm manila envelop labelled "15x100 MpA" contain analyzed - suspect? No idea - seems unlikely that be hard to make and it is not very potent. Unweight together.	this is the d-isomer	of MDA - it would
EXHIBIT #20 (22214)		
As above (2213) Square paper envelop labelled "Meshighly crystalline white solids . not analyzed. Su	sc #2" containing wax uspect mescaline sulf	paper containing ate. 10mg.
EXHIBIT #21 (22218)		
As above, white envelope labelled "AD" containing off white solids - not analyzed - no guess as to w) containing 15mg

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

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

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(Continuation)	3. FILE TITLE	
	(b)(7)(C)	
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 so	old - labelled (b)(7)(C)	no memory of
what or from where - not analyzed.		
EXHIBIT #23 (22228)		
Blue-line ziplock several chunks of hard white crys "Rock" no idea who or where.	stals label "syntheti	c hydrochloride
EXHIBIT #24 (22211)		-
ML's from an old 2C-B synthesis. My writing- sampl 2C-B.	le from lab for IR.	Probably contains
EXHIBIT #25 (22207)		
"456 mg Loo 08/15/86" white solid - no memory of Ensheet name - not analyzed.	rom where - no idea c	of Loo in person or
EXHIBIT #26 (22213)		
Square paper envelop 5cm x 5cm labelled "Mesc #3" crystalline solids (white). Not analyzed. Suspect		
EXHIBIT #27 (22210)		
Vial labelled "Nexus ex Frasila" (or Franila) - Ori	igin unknown - not ar	nalyzed.
EXHIBIT #28 (22220)		
Envelope labelled "MDM Clone MDE? MDOH?" Containing containing 100mg brown sticky solids. Not analyzed		
EXHIBIT #29 (22208)		
Plastic egg (discarded) containing a Al foil (discarded) tablet - not analyzed.	ard) containing a mic	croscopic purple (?)
EXHIBIT #30 (22230)		

DEA Form — 6a (b)(7)(C)

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

REPORT OF INVESTIGATION	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER
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2" x 8" x 1 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) labe led "2CB" contains AL foil, which contains a few mgs of a fluffy white crystal. Maybe ZC-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)

Blue-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 "B Mesc SO4" again wax paper (both discarded) containing fine white crystalline solid - possible mescaline sulfate not analyzed. Source? 10 mg.

EXHIBIT #35 (22222)

Sealed 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 "G1 Mesc S04" containing waxed paper (paper discarded) containing 10mg 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.

DEA Form (May 1980)

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

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4. Page 5 of 6	
5. PROGRAM CODE	6. DATE PREPARED November 10, 1994
EXHIBIT #38 (22225)	
Envelop (airmail) from Germany (Frankfurt postmar edges containing 10mg white xtabs. Paper labelle	
EXHIBIT #39 (22205)	
Petri dish with "118 mg early Berlin, whknown sal MDMA? Not yet analyzed. Received from someone i	t - dated 11/86 - possibly a salt of n Germany.
EXHIBIT #40 (22217)	
As above - white paper envelope labelled "G MDA G (discarded) containing 150mg off white granular s	04". (5x5cm) containing wax paper olids.
EXHIBIT #41 (22201)	
Mail, from hawaii - 8 yellow tabs of 3 reddish ta purple from see-jesus description & immobility, m Received in 35mm film canister March 1994?	bs, called "T" Golden Power - chip of aybe PCP. Not analyzed. Note discarded.
EXHIBIT #42 (22203)	
The other of 2 samples (see above) identified by microcassette plastic boxes. 4 white tablets.	"B" same UPS package. Both samples in
EXHIBIT #43 (22202)	
One of 2 samples (see next one) identified by "A next day air - received in July or August 1994, e from where. No idea or hint of what it is.	" and a name on the envelop, UPS ight white biconvex tablets - don't know
EXHIBIT #44 (22204)	
Aluminum - wrapped pill (pills?) from Spain - not also MDMA-like! Not yet looked at - possibly DOE	e says 20 hour effect, very LSD like and or DOM? Received early 1994.
EXHIBIT #45 (22221)	
Sealed envelope labelled "For Sasha from (d) (d) (save) and a couple of smashed gel capsules (about	iscarded) containing a 200mg tan solids t 000).
EXHIBIT #46 (22231)	
DEA Form (May 1980) - 6a (b)(7)(C) DEA SENSITIVE	

DEBODY OF INVESTMENT	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER
REPORT OF INVESTIGATION (Continuation)	3. FILE TITLE (b)(7)(C)	
Page 6 of 6		
PROGRAM CODE	6. DATE PREPARED November 10, 19	94
Small cardboard box, transparent top, found in m year (a few years ago?) From Hawaii - maybe (b)(7)(C)	Not analyzed	
Sample received from VA Hospital, SF - probably plastic bags - one with a powder. Not analyzed.		
Chain of Custody: On October 31, 1994, the drug exhibits 17-47 were residence to D/I (b)(7)(C),(b) (see attached DEA-12, Rec #2). D/I (7)(F) transported the exhibits to DEA 1994, the exhibits were processed by I/I (b)(7)(C),(b)(7)(C),(b)(7)(C),(c)(C)(C),(c)(C)(C),(c)(C)(C),(c)(C)(C),(c)(C)(C),(c)(C)(C),(c)(C)(C),(c	eipt for Cash or othe SFFD for safekeeping. (F) (see att	r items, attachmen On November 1, ached DEA-7's,
5. It should be noted that on the October 27, 1 DEA S/A (b)(7)(C),(b)(7)(F) and Chemist (b)(7)(O) of the suspect 2CB samples but did not want to it want to get them into trouble. SHULGIN stated to mailed by individuals he communicates with via the SHULGIN failed to maintain controlled substance required by 21 CFR 1304.27 in violation of 21 US	that he did kno dentify the individua hat some of the sampl he INTERNET Computer receipt records on sa	w who sent him som ls because he did es sent to him wer System. Alexander
6. After collecting the exhibits noted in this SHULGIN's residence at approximately 1:00p.m., t Inspection. The Warrant was returned to the Cou	hus terminating the A	
ATTACHMENTS: 1. Shulgin Inventory 2. DEA-12, dated October 31, 1994 3. DEA-7's		
INDEXING SECTION:		
1. SHULGIN, Alexander - NADDIS: 294983		
EA Form — 6a (b)(7)(C) DEA SENSITIVE		

DRUG ENFORCEMENT ADMINISTRATION

REPORT OF INVES	TIGATION			Page 1 of 3	
1. PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE NO. R3-93-2077	4. G-DEP (b)(7)(E)	IDENTIFIER
5. BY (b)(7)(C),(b)(7)(F)	\dashv		6 FILE TITLE	(b)(7)(C)	
AT: Investigator		N.	(b)(7)(C)	2	
San Francisco, CA	1 13	r	1		
,	1 8			l ý	
7. Closed Requested Action Complete	# 8		8. DATE PREPARE	0	
Action Requested By:			November 3,	1994	
D. OTHER OFFICERS: S/A (b)(7)(C),(b)(7)(F)	, S	(b)(7)(C),(b)(7)(F)	S/A (b)(7)(C),(l	o)(7)(F)	
O. REPORT RE: Administrative I	nspection	Warrant on 09	/27/94, or AI	exander SHULG	IN,
Analytical Labor					
NOPSIS:	p=	/			
September 27, 1994, the DE	A SFFD ser	yed a DEA Ada	inistrative I	uspection War	rant on DEA
gistrant Dr. Alexander SHUL					
gistration, drug schedules					
. SHULGIN was conducting un					
strolled substance receipt					
ptember 28, 1994. The purp					
Dr. SHULGIN to DEA on Sept					
ULGIN's library/computer ro		xnibits were	subsequently	iorwarded to	DEA Special
sting Lab, McLean, VA for a	nalysis.		10/		
			1		
TAILS:			d		
Reference is made to the fidavit for Administrative					
ministrative Inspection War			actimotic nay a	ii ciic maccci	OI CHE
ministrative inspection war	ranc or .	x *			
Alov	ander T. S	ин сты			
			1 - 7 57		
		Drug Schedu	TG T-A		
	-	on PS0061616			
	Shulgin R				
Lafa	yette, CA	94549 (Dr. SH	ULCIN's resid	ence)	
The following information	is docume	nted in DEA R	OI same file	number and ti	tle as this
port, dated September 30, 1	994, secti	on 10. regar	ding controll	ed substances	found in
. SHULGIN's library/compute		,	S COMMITTEE	- 5 Capir Carices	Tourd III
J. D. D. L. D. L. L. J. Compute	2 LOOM .				* * * * * * * * * * * * * * * * * * * *
ring the DEA Administrative	Inspectio	n of Dr CHIII	CTITLE meiden	co/laborator	on
ntember 27 1094 by D/T(b)(7)(C),(b) C/A (b)(7	7/(C),(b)(7)(F) and	S/A (b)(7)(C),(b)(7)(F)	Toward	(b)(7)(C),(b)(
ptember 27, 1994 by $D/I_{\frac{(b)(7)(C)}{(7)(E)}}^{\frac{(b)(7)(C)}{(7)(E)}}$			nt rolled and	investig	ator (b)(7)(C),(b)(
ked Dr. SHULGIN to indicate			ur torted shos	cance records	. Dr.
1. DISTRIBUTION: OPR (b)(7)(C)	(D)(7)(C),(b)(7)(F)			13. DATE
REGION	1				11/18/
DISTRICT					15. DATE
AMET OFF	ie:				11/2//
OTHER AMRI, ODOD				rvisor	
DEA Form (b)(7)	DEA	SENSITIVE			

REPORT OF INVESTIGATION (Continuation)	1. FILE NO. R 3-93-20/7	2. G-DEP IDENTIFIER (b)(7)(E)
4. Page 2 of 3	(b)(7)(C)	
5. PROGRAM CODE	6. DATE PREPARED November 3,	1994
SHULGIN led the Investigators to his library/cobooks, papers and file cabinets. In the center and desk. Upon entering the room, D/I (0)(7)(C) of various glass vials containing powder or liquic cabinet. D/I (0)(7)(C)(D) observed one clear glass vials containing powder or liquic cabinet. D/I (0)(7)(C)(D) observed one clear glass vials contained. Description of the file cabinet; three plastic baggies ontain glassed by the file cabinet; three plastic baggies ontain glassed by the file cabinet; three plastic baggies ontain glassed by the file cabinet; three plastic baggies ontain glassed by the file cabinet; three plastic baggies ontain glassed by the file cabinet; three plastic baggies ontain glassed by the file cabinet; three plastic baggies on the graph of cabinets were. D/I (0)(7)(C)(D) asked by the file cabinet; the file cabinet; three plastic baggies on the graph of cabinets were were. D/I (0)(7)(C)(D) asked by the file cabinet; the file cabinet (0)(7)(C) asked by the file cabinet; the file cabinet (0)(7)(C) asked by the file cabinet; the file cabinet (0)(7)(C) asked by the file cabinet; then stated, (0)(7)(C) asked by the file cabinet; then stated, (0)(7)(C) asked by the file cabinet; then saked by the file cabinet; the file cabinet (0)(7)(C) asked by the file cabinet; the file cabinet (0)(7)(C) asked by the file cabinet; the file cabinet (0)(7)(C) asked by the file cabinet; the file cabinet (0)(7)(C) asked by the file cabinet; the file cabinet (0)(7)(C) asked by the file cabinet; the file cabinet (0)(7)(C) asked by the file cabinet; the file cabinet (0)(7)(C) asked by the file cabinet; the file cabinet (0)(7)(C) asked by the file cabinet; the file cabinet (0)(7)(C) asked by the file cabinet; the file cabinet (0)(7)(C) asked by the file cabinet; the file cabinet (0)(7)(C) asked by the file cabinet; the file cabinet	r of the room there observed two drinking a located in plain vital with white top color observed the following powder marked 5-35 Schedule II Marinolems on top of the calcold and that he was ecords on the items of a glass test tube of the calcold and that he was ecords on the items of a glass test tube of the calcold and that he was ecords on the items of a glass test tube of the calcold and that he was ecords on the items of the calcold and that he thought in trouble, in Shulcin stated that on white paper for placem what he thought in the calcold and that he was ecords on the items of the calcold and that he was ecor	was a computer terming glasses containing iew on top of a file ontaining powder labellowing items on top of -28-91 AD/9-18-91-AD/1 capsules. binet were controlled not sure what they on top of the cabinet containing tan powde was. Dr. SHULGIN m our lab"? Dr. SHUL that's not (b)(7)(C) ke a closer look at tasked Dr. SHULCIN when the believed it was a hotography. D/I (b)(7)(C) it was. Next to the tachment #3). D/I (b)(7)(C)

Drug exhibits 10-16 were surrendered by Dr. SHULGIN at his residence, 1483 Shulgin Rd., Karayette, CA to D/I (b)(7)(C), who transported the items to DEA SFFD for safekeeping. On October 28, 1994, the exhibits were processed by D/I (b)(7)(C), and S/A (b)(7)(C), and mailed to DEA STRL, McLean, VA for analysis (see DEA-7's, attachment #5).

DEA Form — 6a (b)(7)(C)

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

REPORT OF INVESTIGATION	1. FILE NO. R3-93-2077 2. G-DEP IDENTIFIER
(Continuation) Page 3 of 3	3. FILE TITLE (b)(7)(C)
5. PROGRAM CODE	6. DATE PREPARED November 3, 1994

ATTACHMENTS:

- 1. Warrant for Administrative Inspection
- 2. Affidavit for Administrative Inspection
- 3. Shulgin Description of Samples
- 4. DEA-12's
- 5. DEA-7's
- 6. Photographs

INDEXING SECTION:

1. SHULGIN, Alexander - NADDIS: (294983)

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

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

		4		
I. PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE NO. R3-93-2077	(b)(7)(E)
(b)(7)(C),(b)(7)(F)			6. FILE TITLE	
AT:Investigator	Ιŏ	AX	(b)(7)(C)	'
San Francisco, CA		gr-		
The second secon				
. Closed Requested Action Completed			8. DATE PREPARED	0.1
Action Requested By:	(7) G / A t - ((b)(7)(C),(b)(7)(F)	November 3, 19	TFA (b)(7)(C),(b)(7)(F)
OTHER OFFICERS: G/S S/A $(b)(7)(C),(b)$ (F) (E) (F) (E) (E) (E) (E)		IE S/A (b)(7)(C),(b)(7)	(F) Contra Cos	ta DA Inv. (b)(7)(C),(b)(7)(F)
O. REPORT RE: Second Administra	tive Inst		at (10/27/94), A	lexander SHULGIN
Analytical Labora	tory, DEA	#PS0061616 (RA40) (Drug Ex.	1 Through 9)
		/		
NOPSIS:		/		
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s report documents the Admi	nistrativ	Inspection	or the registra	n Bood Tofornita C
JLGIN, Analytical Lab, DEA	PS0061616	, Schedules I	-v, 1483 Shulgi	h koad, Larayette, GA
549, on October 27, 1994. (n septemb	per 27, 1994,	occober 2/, 199	and continuing on
cober 31, 1994, the DEA exec	cuted Admi	nistrative Ir	spections of Al	exander SHULGIN'S
ooratory/residence based on	his publi	c statements	regarding resea	rch with Hallucinoger
igh Times Article August 94	and a re	eview of Dr. S	HULGIN'S Violat	ive history with the
	subsequer	it linvestigatli	ons revealed th	at SHULGIN is
	Danocyacz	ic part co cago		
nducting unauthorized Schedu	le I rese	earch and fail	ed to maintain	controlled substances
nducting unauthorized Scheduceipt, manufacturing and des	ule I rese	earch and fail records. Or	ed to maintain the October 27,	controlled substances 1994 inspection by t
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nducting unauthorized Scheduceipt, manufacturing and des A, Alexander SHULGIN was for e DEA SFFD also participated sidence on October 27, 1994 vestigation is ongoing. Aleman drug testing. DEA Chemicution of the warrant and a e DEA STRL for analysis. TAILS: Reference is made to the attachment #1) and Affidavit tter of the Administrative Alexa Analy DEA 1483 Lafay	alle I resestruction and to be in a State involving exander Shist (b)(7)(C) assisted in the section ander T. Sy tical Lab Registrati Shulgin Frette, CA	varrant for last varrant of la	ded to maintain the October 27, essession of Schoearch Warrant or ironmental violuble believed to be desting Laboratorion of samples despection dated espection Warrant deles I-V	controlled substances 1994 inspection by the dule I Peyote plants f Dr. SHULGIN's ations, this involved in illegal ry, participated in the subsequently sent to October 26, 1994 (attachment #2) in the subsequently sent to

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5. PROGI	RAM CODE	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 I 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, R3-93-2077, 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 (b)(7)(C) and STRL Chemist (b)(7)(C) put on protective clothing and entered the lab located at the rear of the property and conducted an interview with Dr. SHULGIN.
 - 7. Investigator (7)(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 to permanent Schedule I. Chemist (6)(7)(C) 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)

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

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	November 3, 199	94
Dr. SHULGIN stated that this was identical to Schubstituted for the 4 bromo compound. Dr. SHULG treatment for mental illness.		
Exhibit #2 - Methylene Dioxy Methcathinone - Sch	edule I analog - 8 g	rams (on hand)
Dr. SHULGIN stated that he is researching a Methode Me	Dr. SHULGIN stated in the year but had so log book dated 05 fication of Methcat one obtained from so IN stated that he he	that he made no record of its /10/94 regarding what hinone "from several everal sources e used the 6.9 grams
Exhibit #3 - MDMA - Schedule I		
Dr. SHULGIN identified this vial as containing 20 made in the last year to study its decomposure to a black "goo" was being found at Clan Lab sites. turns black when exposed to light. STRL Chemist production of MDMA or Hydroxy MDMA was not considered to the its more for analytical needs. When you get into the area of going from the lode or lare into chemical research if it happens to go that its a semantic argument, your side has merit".	h light because he had he was attempting to the was attempting to the was attempting to the was attempting asked Dr. I had been asked Dr. I had been attempted at a second or the was a second or the was a second at a second at a second at a second at a second a sec	ad heard reports that to determine if MDMA SHULGIN why his SHULGIN responded, idues? I admit when into other things you e of a Scheduled drug.
Exhibit #4 - 2CB AKA "Nexus" - Schedule I - Quan	ity - 3.42grams (on	hand)
Dr. SHULGIN stated that he has made approximately Dr. SHULGIN stated that he is looking at the postrats and ultimately humans for treating mental in records to account for the 2CB he has manufacture taken for analysis.	sible effect of 2CB of liness. Dr. SHULGIN	on receptor sites in stated that he has no
Dr. SHULGIN voluntarily supplied Investigator (b)(7) patent titled, "Information concerning the inventation attachment #5). According to SHULGIN, this document that increase a method that a supplied in the state of the state o	(F) with a copy of wition of a new antide ment discusses the user use as an antidepent four individuals as	pressant" (see se of Schedule I ressant. See page 7, re discussed. The Research Panel

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

REPORT OF INVESTIGATION (Continuation)	1. FILE NO. R3-93-2077 3. FILE TITLE (b)(7)(C)	2. G-DEP IDENTIFIER (b)(7)(E)
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	November 5, 1994	
(b)(7)(C) have the authority to conduct human d that this patent information has been submitted to Neurobiological Technologies Inc., 1440 Regatta BIO(D)(7)(C)	(b)(7)(C)	tent Attorney,
(b)(7)(C),(b)(7)(F)		
Dr. SHULCIN has not obtained IND's fo	r his drug research.	
Exhibit #5 - NMDA -2 Schedule I MDMA - 20.7grams	on hand)	
Dr. SHULGIN stated that he made 10 grams of this i records to document its manufacture. SHULGIN state 2 and stated that it has a mild hallucinogenic eff	ed that he has perso	nally ingested MMDA-
Exhibit #6 - MDA - Schedule I - Three glass vials	marked MDA Tartrate	
Dr. SHULCIN had no record of manufacture on these surrendered these items because he said he had no manufactured and analyzed these items to look at it	use for them. He th	ought he
Exhibit #7 - MDMA - Schedule I - 1 vial containing	liquid	
Dr. SHULGIN had no record of receipt or manufacture refrigerator and voluntarily surrendered it.	e on this item found	in his lab
Exhibit #8 - MDA - Schedule I		
one vial marked MDA - Dr. SHULGIN had no records of	n it	
Exhibit #9 - unknown white powder in vial		
Dr. SHULGIN thought it might be MDA		
The information above indicates that Alexander SHUD not authorized by his analytical lab registration : failed to maintain controlled substance manufacture violaton of 21 USC 342(a)(5).	in violation of 21 C	FR 1301.22(b)(3) and
Chain of Custody:	7	
DEA Form — 6a (b)(7)(C) DEA SENSITIVE		

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	November 3, 1994	
All exhibits noted above were sampled and/or volume attached DEA-12, Receipt for Cash or Other Items (Agent (b)(7)(C),(b)(7)(F) took custody of exhibits I through processed them as drug evidence as witnessed by S/to DEA Special Testing Research Laboratory 7704 (analysis on October 28, 1994, (see attached DEA-7 analysis on October 28, 1994, (see	attachment #6). Clan igh 9, transported the 'A (b)(7)(C).(b)(7)(F) The ex 'ld Springhouse Road, s, attachment #7). mist (b)(7)(C) hen area of Dr. SHULG ried Dr. SHULGIN rega Chemist (b)(7)(C) aboratory interview of a typed statement sup	Lab Task Force on to the SFFD and chibits were mailed McClean, VA for (b)(7)(C),(b)(7)(F) EIN's house to crding his See attached report of SHULGIN
10. The Investigators also inspected Dr. SHULGIN's spectrometer. This room is located at the rear of were numerous controlled and non-controlled substain the mail. Dr. SHULGIN stated he receives appropriately associates and anonymous individuals he receives and anonymous individuals he receives appropriately associates and anonymous individuals who sent the receives appropriately associates and anonymous individuals he receives appropriately appropriate	the house. Scattere nces that Dr. SHULGIN ximately ten samples as communicated with the vials and stated Coast of the United SCB. Dr. SHULGIN did (7)(F) asked Dr. SHULCUMENT what he though ecct controlled substa	d around this room said he receives a month from over the INTERNET that they contained tates. Dr. SHULG not have records GIN to gather all teach one was.
discontinued keeping records on samples mailed to shuLGIN surrendered these items to the DEA on 10/3 title as this report, dated 11/10/94). The suspector STRL for analysis. 11. Upon exiting Dr. SHULGIN's residence Contra (C)(C),(b)(7) noticed, in plain view, six potted peyote property (b)(7)(C)	him approximately two BI/94 (see DEA ROI, satted controlled substated costa County Sheriffs'	o years ago. Dr. me file number and nnces were sent to Officer (b)(7)(C),(b)(7) s patio.
DEA Form: — 6a (b)(7) DEA SENSITIVE		
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This report is the property of the Drug Enforcem Neither it nor its contents may be disseminated outside	ent Administration.	

Previous edition may be used.

REPORT OF INVESTIGATION	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
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(b)(7)(C),(b)(7)(F) (see DEA RO1 Case # R3-95-0024, dated 11/01/94 Title SHULGIN, Alexander).

SHULGIN was not arrested pending analysis by the Contra Costa County DA's Office (see attached photos of plants, attachment #10).

12. At approximately 2:30p.m. the Inspection was terminated. The Inspection was continued and terminated on October 31, 1994. ATTACHMENTS: 1. Warrant for Inspection, dated October 26, 1994 Affidavit for Administrative Inspection Warrant, dated October 26, 1994 3. Ops Plan 4. Methcathinone Log Book Entry 5. Shulgin Patent Info 6. DEA-12, Exhibits 1-9 7. DEA-7's, Exhibits 1-9 8. DEA Chemist (b)(7)(C) Report (b)(7)(C) 9. 10. Peyote Photos INDEXING SECTION: SHULGIN. Alexander - NADDIS:

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

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DRUG ENFORCEMENT ADMINISTRATION

REPORT OF INVESTI	GATION			Page 1 of 8	
1. PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE NO. R3-93-2077	4. G-DEP IDENT	TIFIER
5. BY: (b)(7)(C),(b)(7)(F) AT: Investigator San Francisco, CA 7. Closed Requested Action Completed	00000		6. FILE TITLE (b)(7)(C) 8. DATE PREPARED	(b)(7)(C)	
	U		September 3	10 1994	
9. OTHER OFFICERS: S/A S (b)(7)(C),(b)(7))(F)	-	Jeptember 3	,0, 155.	
		n Warrant of	Alexander SHUL	GIN, Analytical	Laboratory
DEA Number PS006					
SYNOPSIS:					
On September 27, 1994, the DE Registrant Dr. Alexander SHUL registration, drug schedules Dr. SHULGIN was conducting un on September 28, 1994.	GIN's re I-V, and	a chemical	e he maintains .aboratory. Th	a DEA Analytical ne inspection rev	Lab ealed that
DETAILS:					
1. Reference is made to the Affidavit for Administration Administrative Inspection War	Inspecti	on Warrant (cant for Inspect attachment #2)	ction (attachment in the matter of	#1) and the
Analyt DEA Re 1483 S	gistrati hulgin R	, Drug Sched on PS0061616 oad	iles I-V GHULGIN'S resid	lence)	
2. On September 27, 1994 at	4.1	. 1			/A (b)(7)(C),(b)(7)(F
arrived at the residence of D where Dr. SHULGIN is register S/A 's $(b)(7)(C),(b)(7)(F)$	ed with	nder\SHULGIN, the DEA as an themselves t	, 1483 Shulgin n Analytical La n Dr. SHULGIN.	Road, Lafayette, aboratory, D/I (b) Dr. SHULGIN in	CA 94549 (7)(C),(b) and vited the
Investigators into his kitcher Inspection Warrant noted in s SHULGIN the purpose of the in Investigators and further adversal following day, 09/28/94. Dur	ection of spection is the spection is the spection is the specific three specific sp	ne of this re . Dr. SHULG t he and his	eport. D/I(b)(7)(c) IN stated that wife and were	he would assist leaving for Spai	Dr. the n the
	-	7)(C),(b)(7)(F)			
11. DISTRIBUTION:					13. DATE
REGION	1				10/24/94
DISTRICT					15. DATE
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3. Dr. SHULGIN'	s Laboratory	7:				The same of	
(b)(7)(C),(b)						3	f
D/I(7)(F) asked	Dr. SHULGIN	to take the	Investigat	ors to h	is laboratory	7	Dr. SHULGIN led
the Investigator	s to a concr	ete buildin	g located b	ehind his	s house measi	arir	ng approximately
15 x 30 feet, th	ree windows	on the side	of the str	ucture.	with a wooder	a de	or with windows.
The Investigator	s experience	d a strong	chemical od	or upon a	approaching t	he	lab. When the
Investigators en	tered the la	boratory the	ey/were exp	osed to a	strong chem	aica	al odor. There
was no ventilati	on in the la	b. The roo	contained	two work	tables that	We	ere cluttered
with chemicals a	nd equipment	. The walk	s and floor	of the	laboratory we	re	also cluttered
with chemical co	ntainers, so	me of which	appeared t	o be corr	coding with	age.	(See attached
photographs, att.	achment #3).				and when	*8-	(occ accached
			-				
Investigator (b)(7)(6 (b)(7)(7)	asked Dr.	SHULGIN 1f	he would i	dentify a	and weigh cor	itro	11ed substances
that he had on ha	and in the 1	aboratory.	Dr. SHULG	N weighed	the followi	ng	controlled
substances:		,		. weight	i che lollowi	6	Controlled
Controlled Sub	stance	Schedule	Quan	tity			
to the special color against the special color and the special color against the special color and the special color against the special color again				crey			
2С-В		I	3.42	grams			
Methcathinone		I		grams			
(b)(7)(C),		_	1	61 amo			
D/I (b)(7)(F) asked I	Dr. SHULGIN	what he was	doing with	the cont	rolled cubet	and	es, Dr. SHULGIN
stated that "I ma	ake tools fo	r medicine"	and stated	the foll	Owing regard	ling	bic receptable
	*			ene rori	owing regard	1116	mis research.
2C-B aka "Nexus"	- Schedule	I					
Dr. SHULGIN state	ed that his	research wit	h 2C-B inv	olved it	S 11SP IITO T	rea	t montal
illness" and as,	"A tool to	open up the	subconscio	us to be	used in ther	100	II Do CHILCIN
stated that he wa	ants to dete	rmine the ef	fectivenes	s of 2C-B	on recentor	ei	tes of mate
				01 20 1	on receptor	21	tes of fats.
Methcathinone - 9	Schedule I	لـــــ	L				
Dr. SHULGIN state	d that he wa	as using met	heathingne	and enhe	drine in on	~ E E	omt to 1 11
Schedule I MDMA a	action withou	ut the neuro	tixic effe	te. Dr	SHILCIN sta	tod	ort to duplicate
WOLKTHE OH THIS E	xperiment a	nd others in	cluding the	se with	2CB with (b)(7)(C)	that he was
b)(7)(C)	(b)(7)(C)	- (b)(7)(C)	ZOG WILI	2.00		
SHULGIN stated th	at he and (b)(7)(C) wor	k in SHULG	N's lab	on Sunday ov	oni	ngs and that on
Mondays, Dr. SHUL	GIN and (b)(7)(C	do re	search toge	ther at	the CF Con	ent	ngs and that on
Department of Tox	icology and	Experimenta	1 Pharmacol	ogy. UCS	F (b)(7)(C)	CLa.	
SHULGIN stated th	iat both he a	and (b)(r)(c)	transport	control	lod outers	0.0	to and from his
lab and the lab a	t S.F. Gener	ral Hospital	Without do	Climentat	ion Dr Cui	III C	Thi -1 1
onde ne bends and	receives co	ontrolled su	bstance sam	ples to	and from oth	on.	rosoarahara
including :				1 -00 -00	TLOW OLI	-1	researchers
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Purdue University Phar		
School of Pharmacy and		
Department of Medicina		acology
West Lafayette, IN 47		
DEA $(b)(7)(C)$, exp. 1	0/31/95	
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(b)(7)(C)		
Purdue University Phar	macy, Bldg. 410B	
West Lafayette, IN	,,	
(b)(7)(C)		
Neurobiological Technologies	Inc. (NTT)	
1440 Regatta Blvd.	, inc. (hii)	
Richmond, CA 94804 (CSA, NA	DDTC: Nogative)	
RICHMONG, CA 94004 (CSA, IIA	DDIS: Negacive)	
(b)(7)(C)		
Phone (O)(7)(C)		
(CSA, (b)(7)(C)		
Dr. CHILICIN stated that he and (b)(7)(C)	£	1 6 1777
Dr. SHULGIN stated that he and (b)(7)(C) are conductive (b)	ting most of their re	esearch for NTI in
hopes of getting patents and IND'S. Investigator (7)	(F) asked Dr. SHULG	IN if he had
receipt or manufacturing records for the 2CB or Met		
and $^{(b)(7)(C)}$ synthesized the methcathinone and 2^{C} B		
separate green colored ledgers documenting what the		
the ledgers contain material that he and $(b)(f)(C)$	expected to patent as	nd was concerned
that the material remain confidential. Dr. SHULGIN	stated that the Invi	estigators could
return any time and review his records. The green	ledgers were not rev	iewed by the
Investigators. Dr. SHULGIN had no inventories on c	ontrolled substances	or analogues in
his laboratory. When Investigator (b)(7)(C),(b) asked if t	he ledgers contained	controlled
substance "manufacturing" records, Dr. SHULGIN resp	orded, "That's a lop	sided and loaded
term, I prefer to use synthesized."	,	20000
Ephedrine Reduction:		
Investigator (b)(7)(C), (b)(7)(F) observed a glass container on Dr	. SHULGIN's laborate	ry table mani-1
Ephedrine and Penick. Inside the container was a c	hunk of charactel D	y cable marked
that he was researching a factor reduction mathe 1	or motherships	r. Shuldin stated
that he was researching a faster reduction method f	or mernampheramine us	sing Ephedrine,
Trichloric Acid, Hydrogen and Platinum Chloride. S	ee lab photo, clear {	glass container,
black top, front of white label (see attachment #4)	•	

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

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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:

S/A (F) 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 (E) 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 (DOTA)(DOTA)(DOTA) entered the shed and noted numerous cans and bottles of chemicals including accetone. 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 (DOTA)(DOTA) 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) (May 1980) - 6a

DEA SENSITIVE

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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 any 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), 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 only controlled substance ordered in the last two years.

Supplier	Drug/Quantity	/Schedule	Order Date	Date Received
Sigma Chemical Company 3050 Spruce Street St. Louis, MO	2 (Methylamir Propiophenone		04/10/94	Unknown
DEA # Not Documented	A-Ethyltrypta Acetate 25gr			

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 — 6a (b)(7)(C)

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

samples he received. Dr. SHULGIN stated that at or documenting samples he received for analysis but the years ago. Investigator (D)(T)(C),(D) seized two items from attached and baggie containing powder with the word stated he had no idea what the items on the table will black tops marked either "Nexus" or "Nexus Mother I liquid (see photo attachment #12). Dr. SHULGIN idea "Nexus" (2CB) and the mother liquor of (2CB). Dr. 2CB chemicals but he did not have any documentation 12. Dr. SHULGIN stated that he was late for meeting Investigators gave Dr. SHULGIN a receipt for items attachment #13) and advised Dr. SHULGIN that DEA me his return. The Investigators exited the residence Investigator (D)(T)(C),(D) (T)(F) returned to the DEA SFFD and place overnight safe for safekeeping. ATTACHMENTS:	ned various machines of the room was a table as an infra-red spect GIN described as samp sociates and anonymous he receives are contained at he stopped the document #4, a lett Oscarick written on ere except for 4 cleans.	"Basement #4." that Dr. SHULGIN the on which there trophotometer. The sindividuals for trolled substance tords documenting a log book tumentation a few ter with a pill it. Dr. SHULGIN or glass vials wit
Adjacent to the library/computer room is a room Dr. This room appeared to be a storage room that contain described as diagnostic equipment. In the center of was a balance scale and what Dr. SHULGIN described Scattered around this area were items that Dr. SHULTON to him by friends or are mailed in from friends, as analysis. Dr. SHULGIN stated that some of the item analysis. Dr. SHULGIN stated that some of the item asked Dr. SHULGIN stated that at odocumenting samples he received for analysis but the years ago. Investigator (b)(7)(c)(b) seized two items from attached and baggie containing powder with the work stated he had no idea what the items on the table of black tops marked either "Nexus" or "Nexus Mother I liquid (see photo attachment #12). Dr. SHULGIN idea "Nexus" (2CB) and the mother liquor of (2CB). Dr. 2CB chemicals but he did not have any documentation attachment #13) and advised Dr. SHULGIN a receipt for items attachment #13) and advised Dr. SHULGIN that DEA mattachment #13) are for safekeeping. ATTACHMENTS:	September 30, 1994 SHULGIN described as ned various machines of the room was a table as an infra-red spect GIN described as sampsociates and anonymous he receives are contained at he stopped the document #4, a lett Oscarick written on ere except for 4 clea	"Basement #4." that Dr. SHULGIN the on which there trophotometer. The sindividuals for trolled substance tords documenting a log book tumentation a few ter with a pill it. Dr. SHULGIN or glass vials wit
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	ntified these items a SHULGIN stated that he of their manufacture g some friends for ditaken during the inspector of the summer of the state of the	ns Schedule I ne synthesized the nner. The section (see stion Warrant upon
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		

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(Continuation) Page of	(b)(7)(C)	
PROGRAM CODE	6. DATE PREPARED September 30.	1994
SHULGIN, Alexander - NADDIS: 294983 (b)(7)(c)		
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1. PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE NO. R3-93-207	4. G-DEP IDENTIFIER
5. BY: (b)(7)(C),(b)(7)(F) AT: Investigator San Francisco, CA			6. FILE TITLE (b)(7)(C)	
7. Closed Requested Action Completed			8. DATE PREPARE	
9. OTHER OFFICERS:	1		September	9, 1994
	(b)(7)(C)	(===(0)		
10. REPORT RE: Meeting with AUS	SA (C)(T)(C)	(PM40)		
DETAILS: 1. On September 9, 1994, Inv			the Admi	to discuss the nistrative Inspection of Dra
Alexander SHULGIN's DEA regis	stered to	cation.		
INDEXING SECTION:)		
(b)(7)(C)				
	,			
11. DISTRIBUTION:	(b)(7)(C),(b)(7)(F)		13. DATE
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DISTRICT				15. DATE
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DEA Form (May 1980) - 6 (b)(7)(C)		SENSITIVE MENT ADMINISTRATION		

REPORT OF INVESTIG	GATION	*		Page 1 of 1
1. PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE NO. R3-93-2077	4. G-DEP IDENTIFIER
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AT: Investigator	20000	AX	(b)(7)(C)	
San Francisco, CA	ñ	/ (/ \		(b)(7)(C)
	Ö			
7. Closed Requested Action Completed			August 23, 199	AG
Action Requested By:			August 23, 17.	77
O. OTHER OFFICERS:				
10. REPORT RE: Meeting with AUSA	Re: Che	mist Alexande	r SHULGIN (PM40))
ETAILS:		/		
. On August 23, 1994, Investi	gator (b))(7)(C),(b)(7)(F)	gave AUSA (b)(7)(C)	a draft copy of
n Administrative Inspection Wa	arrant (a	nd Supporting	Affidavit regar	
nspection of Dr. Alexander SHU	JLGIN's	DEA Registere	d location: 1483	3 Shulgin Road,
afayette, CA 94549, where he i	is regis	tered with the	e DEA as an Ana	lytical Laboratory, DEA
egistration PS0061616.)		
TTACHMENTS:				
· Draft of Inspection Warrant	and Su	pporting Affi	davit	
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SHULGIN, Alexander - NADDIS	5: 29498	3		
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DRUG ENFORCEMENT ADMINISTRATION

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Previous edition may be used.

4 4 600 4	ORT OF INVEST	IGATION			Page 1	lof 2	
PROGRAM CODE		2. CROSS FILE	RELATED FILES	3. FILE NO. R3-93-2077		4. G-DEP IDI	ENTIFIER
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BY: (b)(7)(C),(b)(7)(F)			.8	(b)(7)(C)			
AT: Investigat		1 12					
San Franc	Lsco, CA	1 4					
		4 H		8. DATE PREPAR	ED		
Closed Requi	ested Action Completed			July 20, 19			
Action Requested	Ву:			July 20, 1.	774		
OTHER OFFICERS:							The second second
REPORT RE: Dr	. SHULGIN, Sche	edule I R	esearch "PIHK	AL" (CH50)			
			/				
AILS:			/				
1			Jan 55 170	Dhonethwlami	nes note	d on page	es 453-457
Reference i	s made to the a	attached	maex of 1/9	f list\ To	hie hoo	k SIDIHK	AL" Dr.
Dr. SHULGIN'	s book "PIHKAL"	(see at	tached copy o	I list). In	and De	CHITCIN	le parenne
IT CTH provide	c the cynthesis	recine) for 1/9 Phe	nethylamines	and Dr.	SUOTRI	s persona
monte on hum	an experimental	tion with	each analogu	e. Dr. SHULGI	w does n	or mave	Life.
hority to co	nduct drug expe	eriments	with humans.	Dr. SHULGIN	is regi	stered a	s an
alvtical Lab	Schedules I-V.						
Investigato	r (b)(7)(C),(b) request	ted that	(b)(7)(C)	DEA/ODE re	view the	Pheneth	ylamine
et noted in s	ection 1 of the	is report	and determin	e if the dru	gs liste	d were c	ontrolled
bstances.							
bstances.							
On July 15,	100/ ₄ (b)(7)(C)		DEA/ODE fax	ed a list of	control	led subs	tances
on July 15,	ULGIN's phenet	bylomine	list noted in	section 1.	(b)(7)(C)		entified
			TIPL HOLLER TE	, becerate			
Led III DI . SI	lalar of cont	rolled cu	hetances.				
e drugs noted	below as cont	rolled su	bstances.				
e drugs noted	below as cont	rolled su	bstances.				
e drugs noted	below as cont	rolled su	bstances.				
e drugs noted	below as cont	rolled su	A under hall				
e drugs noted	below as continued #18	rolled su in the CS 4F	SA under hallu SR 3,5-DMA	cinogens:			
e drugs noted	below as contare controlled #18 #20	rolled su in the CS 4F 4F	SA under hallu SR 3,5-DMA SR 2,5-Dimetho	cinogens:			
e drugs noted	#18 #20 #53	rolled su in the CS 4F 4F 2,	A under hallus BR 8,5-DMA BR 2,5-Dimetho	cinogens:			
drugs noted	#18 #20 #53 #54	rolled su in the CS 4F 4F 2, 2,	SA under hallu SR 3,5-DMA SR 2,5-Dimetho 4-DMA 5-DMA	cinogens:			
e drugs noted	#18 #20 #53 #54	in the CS 4F 4F 2, 2,	A under hallus BR 3,5-DMABR 2,5-Dimethor 4-DMA5-DMA4-DMA5-DMA5-DMA5-DMA5-DMA5-DMA5-DMA5-DMA5	cinogens:			
e drugs noted	#18 #20 #53 #54	in the CS 4F 4F 2, 2, 3, 4F	A under hallus BR 3,5-DMA BR 2,5-Dimetho 4-DMA 5-DMA 4-DMA 8R 2,5-DMA	ncinogens:			
e drugs noted	#18 #20 #53 #54 #55 #62	in the CS 4F 4F 2, 2, 3, 4F	A under hallus BR 3,5-DMA BR 2,5-Dimetho 4-DMA 5-DMA 4-DMA 8R 2,5-DMA	ncinogens:			
e drugs noted	#18 #20 #53 #54 #55	in the CS 4F 4F 2, 2, 3, 4F	A under hallus BR 3,5-DMA BR 2,5-Dimetho 4-DMA 5-DMA 4-DMA 8R 2,5-DMA	ncinogens:			
e drugs noted	#18 #20 #53 #54 #55 #62	in the CS 4F 4F 2, 2, 3, 4F	A under hallus BR 3,5-DMA BR 2,5-Dimetho 4-DMA 5-DMA 4-DMA 8R 2,5-DMA	ncinogens:			
e drugs noted	#18 #20 #53 #54 #55 #62 #68	in the CS 4F 4F 2, 2, 3, 4F	A under hallus BR 3,5-DMABR 2,5-Dimethor 4-DMA5-DMA4-DMA5-DMA5-DMA5-DMA5-DMA5-DMA5-DMA5-DMA5	ncinogens:			
e drugs noted	#18 #20 #53 #54 #55 #62 #66 #68	in the CS 4F 4F 2, 2, 3, 4F	A under halls A under halls BR 3,5-DMA BR 2,5-Dimetho 4-DMA 5-DMA 4-DMA -ethyl-2,5-DM -methyl-2,5-DM -methyl-2,6-DM	ncinogens:			
e drugs noted	#18 #20 #53 #54 #55 #62 #66 #68 #69 #100 #106	in the CS 4F 4F 2, 2, 3, 4- 4- 4- MI	A under halls A under halls BR 3,5-DMA BR 2,5-Dimetho 4-DMA 5-DMA 4-DMA -ethyl-2,5-DM -methyl-2,5-DM -methyl-2,6-DM 4-MDA DE DMA	ncinogens:	•		
e drugs noted	#18 #20 #53 #54 #55 #66 #68 #69	in the CS 4F 4F 2, 2, 3, 4- 4- 4- MI	A under halls BR 3,5-DMA BR 2,5-Dimetho 4-DMA 5-DMA 4-DMA 6R 2,5-DMA -ethyl-2,5-DM -methyl-2,5-DM -methyl-2,6-DM 4-MDA	ncinogens:	,		13. DATE
e drugs noted e following a	#18 #20 #53 #54 #55 #62 #66 #68 #69 #100 #106	in the CS 4F 4F 2, 2, 3, 4- 4- 4- MI	A under halls A under halls BR 3,5-DMA BR 2,5-Dimetho 4-DMA 5-DMA 4-DMA -ethyl-2,5-DM -methyl-2,5-DM -methyl-2,6-DM 4-MDA DE DMA	ncinogens:			
e drugs noted	#18 #20 #53 #54 #55 #62 #66 #68 #69 #100 #106	in the CS 4F 4F 2, 2, 3, 4- 4- 4- MI	A under halls A under halls BR 3,5-DMA BR 2,5-Dimetho 4-DMA 5-DMA 4-DMA -ethyl-2,5-DM -methyl-2,5-DM -methyl-2,6-DM 4-MDA DE DMA	ncinogens:			
e drugs noted to following a	#18 #20 #53 #54 #55 #62 #66 #68 #69 #100 #106	in the CS 4F 4F 2, 2, 3, 4- 4- 4- MI	A under halls BR 8,5-DMA BR 2,5-Dimetho 4-DMA 5-DMA 4-DMA -ethyl-2,5-DM -methyl-2,5-DM -methyl-2,6-DM 4-MDA DE	ncinogens:			13. DATE 7/26/4
e drugs noted e following a	#18 #20 #53 #54 #55 #62 #66 #68 #69 #100 #106	in the CS 4F 4F 2, 2, 3, 4- 4- 4- MI	A under halls BR 8,5-DMA BR 2,5-Dimetho 4-DMA 5-DMA 4-DMA -ethyl-2,5-DM -methyl-2,5-DM -methyl-2,6-DM 4-MDA DE	ncinogens:	r		7/26/

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REPORT OF INVESTIGATION	ON		3. FILE TIT			7(7(7	
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Page $_2$ of $_2$							
5. PROGRAM CODE			6. DATE PR				
			July	20, 1994			
#124	Meta DOB						
#157		3,4,5					
#158 #159		2,4,5					
#160	TMA-3	2, 3, 4	-TMA				
#161		2,3,6					
#162		2,4,6					
(b)(7)(C) also advised that		l the	halluci	nogens on S	HULG	IN's lis	st could
be considered controlled substance	analogues.						
ATTACHMENTS:	4						
1. Phenethylamine list from SHULGI	N's book "	PTHKAI	.11				
2. List from DEA/ODE							
INDEXING SECTION:							
1. SHULGIN, Alexander - NADDIS: 29	1/1083			*			
(b)(7)(C)	74903	- 1					
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AT: Investigator		An	(b)(7)(C)	- /
San Francisco, CA		11/	1	
				,
7. Closed Requested Action Completed			8. DATE PREPARED	
Action Requested By:	l		July 8, 1994	
Dr. SHULGIN, "High	n Times"	Article (PM4	0)	
ETAILS:		/		
		/		
 Reference is made to the at ssue of "High Times" magazine 				
HULGIN and (b)(7)(C)				experimentation with
allucinogens. Dr. SHULGIN dis				
exander SHULGIN nor (b)(7)(C)		1		authority to distribut
rugs or conduct therapy with p				
				ove Story, the SHULGINS
iscuss drug experimentation wi				
f unnamed doctors and chemists ontinues to this day and a new				The state of the s
ne way." Tryptamines are LSD				
A to conduct controlled subst				
v 4 *				
 Dr. SHULGIN is registered was 				
HULGIN had his DEA Schedule I				
alifornia Research Advisory Pa				
cense to experiment with mari				
otain approval for non-marijuants. Abstance to a non-registered in				ng of a schedule 1
Totalice to a non regretered i		WI WI CHOUL UI	order rorm.	
TTACHMENTS:				
. High Times Article, August	1994 s	sue	1	
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11, DISTRIBUTION:	(b)(7	(C),(b)(7)(F)		13. DATE
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		MENT ADMINISTRATION the Drug Enforcement Adm		

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. PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE NO. R3-93-2077	4. G-DEP IDENTIFIER
• BY: (b)(7)(C),(b)(7)(F)			6. FILE TITLE	
AT: Investigator	lñ		(b)(7)(C)	
San Francisco, CA				*
100 <u>100 100 100 100 100 100 100 100 100</u>				
. Closed Requested Action Completed			8. DATE PREPARED	-
Action Requested By:	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		June 21, 1994	4
OTHER OFFICERS: BMQA Investiga	(b)(/)(C)			
O. REPORT RE: Meeting with AUSA	, BMQA I	nvestigator (b)	(7)(C) (PM30))
TAILS:		/		
Will State of the				
7)(C),(b)(7)(F)				
()(C)		AUSA (b)(7)(C)		gator (5)(7)(C),(b) also
scussed conducting an admini	strative	inspection o	f Dr. Alexander	SHULGIN's registered
dress. Investigator (b)(7)(C),(b)				caft of an administrative
spection warrant for Dr. SHU	LGIN's DI	EA registered	location.	
		1 1		
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7)(C),(b)(7)(F)				·
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7)(C),(b)(7)(F)		112/1/2		
7)(C),(b)(7)(F) 7)(C),(b)(7)(F)		11271		
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7)(C),(b)(7)(F)	(b)(7)	(C),(b)(7)(F)		
7)(C),(b)(7)(F) - ,(b)(7)(F)	(b)(7)	(C),(b)(7)(F)		13. DATE
7)(C),(b)(7)(F) ,(b)(7)(F)	(b)(7)	(C),(b)(7)(F)		13. DATE
7)(C),(b)(7)(F) ,(b)(7)(F)	(b)(7)	(C),(b)(7)(F)	tor	6/24
7)(C),(b)(7)(F) (b)(7)(F) 1. DISTRIBUTION: REGION	(b)(7)	(C),(b)(7)(F)	tor	13. DATE (/ 2 Y) 16. DATE
7)(C),(b)(7)(F) (b)(7)(F) 1. DISTRIBUTION: REGION	(b)(7)	(C),(b)(7)(F)		6/24

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S. PROGRAM CODE	6. DATE PREPARED
	June 21, 1994

INDEXING SECTION: SHULGIN, Alexander - NADDIS: 294983

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. PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE N		4. G-DEP ID	ENTIFIER
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Closed Requested Action Completed Action Requested By: OTHER OFFICERS: PMOA Trywood des		(C)		h 15, 1994		
bhQa investiga						
Dr. SHULGIN'S "Yo	s" Resp	onse to Item	5b on D	EA-225 Renew	al Applic	ation (PM40
YNOPSIS: n March 11, 1994, Investigate HULGIN's most recent DEA Rene	or (b)(7)(C),(b	ont.		DR to reques	t a copy ODR, loca	
NULGIN's Renewal Application (ICC) stated that the renewal MULGIN did not indicate that chedule I research privileges	and adv was no he had	ised that he the sent to the a prior DEA re	field egistra	d "yes" to q for investig tion revoked	uestion 5 ation bec or that	b. Ms. ause Dr. he had his
Reference is made to a copegistration as an Analytical aswered "yes" to question 5b	Lab, Sch	hedules I-V,	dated J	anuary 8, 19		
5b - Has the applicant evolution of the substances under State or controlled substance reginal a state professional suspended, denied, restri	Federal stration license	l law, or ever n revoked, sur or controlle	r surre spended d subst	ndered or had, restricted ance registr	d a feder or denie	al d, or ever
Dr. SHULGIN responded in as follows:	writing	on the revers	se of h	is renewal a	pplicatio	n (DEA 225)
"Concerning the "yes" res research in the area of s had been underway were co board was made. If such the DEA for re-licensing.	chedule mpleted project	drugs, was and no new a	abandon oplicat	ed in 1977. ion to the re	The proj	ects that dvisory
the suspension of his sched	ule I ma	revocation of arijuana resea	his rarch pr	esearcher regivileges by	gistratio	ornia
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(D)(/)(C) This report is t	RUG ENFORCENT the property of	SENSITIVE MENT ADMINISTRATION the Drug Enforcement Admit minated outside the agency				

W	REPORT OF INVESTIGATION (Continuation)	1. FILE NO. R3-93-2077 3. FILE TITLE (b)(7)(C)	2 G-DEP IDENTIFIER (b)(7)(E)
4.	Page 2 of 5		
5. PROGR	RAM CODE	6. DATE PREPARED March 15, 199	4

2. Reference is made to the attached copy of correspondence from (b)(7)(C)

Acting Chief Counsel, DEA to Dr. SHULGIN, Re: Order to Show Cause (Revocation DEA Registration PS0026206), dated June 9, 1977. The letter reads as follows:

Dear Dr. Shulgin:

On April 12, 1977, the Administrator of the Drug Enforcement Administration directed to you an Order to Show Cause proposing to revoke your registration under the Controlled Substance Act for reasons set forth in the Order.

The Drug Enforcement Administration has received your letter dated May 2, 1977, in response to the Order to Show Cause. Since you did not request a hearing on the issues raised in the Order to Show Cause, your written response has been considered as a waiver of hearing pursuant to Title 21, Code of Federal Regulations, Section 1301.54(c).

The Administrator has considered your position as stated in the aforementioned letter and has concluded that your registration as a researcher with controlled substances in Schedule I should be revoked.

Therefore, pursuant to Sections 303 and 304 of the Controlled Substances Act (21 U.S.C. 823 and 824, respectively), the Administrator of the Drug Enforcement Administration has ordered that your registration PS0026206 be revoked, effective immediately.

Correspondence regarding this matter should be directed to the undersigned, Office of the Chief Counsel, Drug Enforcement Administration, 1405 Eye Street, N.W., Washington, D.C. 20537.

(b)(7)(C)
Acting Chief Counsel, DEA

Investigator (7)(F) is searching DEA records to locate Dr. SHULGIN's written response to his DEA Order to Show Cause.

3. Reference is made to DEA ROI Case #R3-93-2077, which documents the revocation of Dr. SHULGIN's DEA Schedule I Researcher Registration based on withdrawal of the approval of SHULGIN's schedule I researcher projects by the California Research Advisory Panel (CRAP). The CRAP letter notifying Dr. SHULGIN that his Schedule I Research authority has been suspended, reads as follow:

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

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

REPORT OF INVESTIGATION	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER
(Continuation)	3. FILE TITLE (b)(7)(C)	
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5. PROGRAM CODE	6. DATE PREPARED March 15, 1994	

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 I 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, Behavioral Biology 17; 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 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 (May 1980) - 6a (b)(7)(C)

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

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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 protoco

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, harvested 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?

DEA Form — 6a (b)(7)(C)

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

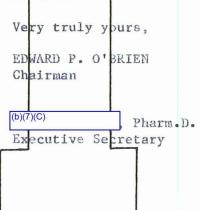
REPORT OF INVESTIGA	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER
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2.f It is not sufficient to state that the storage facilities for the controlled substances are DEA approved. The storage arrangements must be described. Regarding the inventory of controlled 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 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, for until June 30, 1977, whichever comes first.



ATTACHMENTS:

- 1. Copy of Renewal Application
- 2. DEA Revocation Letter
- 3. California Research Advisory Panel Letter

INDEXING SECTION:

1. SHULGIN, Alexander - NADDIS 294983

DEA Form — 6a (b)(7)(C)

DEA SENSITIVE

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Page of 2		
5. PROGRAM CODE	6. DATE PREPARED	
	March 9, 1994	
4. Reference is made to Dr. SHULGIN's book PIHKAL Loved) copyright 1991 throughout his book, Dr. SHULHeroin, Cocaine, Marijuana, Mescaline and over 170 states that he has distributed Hallucinogenic druggent and numerous psychiatrists and chembas a vast inventory of controlled substances that SHULGIN cites his illegal use and human research of Dr. SHULGIN also provides detailed recipes for 178 documents his reaction to them. Dr. SHULGIN is no DEA. He had his DEA Researcher Registration revolutions.	LGIN acknowledges hi Hallucinogenics. D s to (b)(7)(C) mists. Dr. SHULGIN he has collected ov f Hallucinogenics th Hallucinogenics in t authorized to cond	also states that he er the years. Dr. rough the mid 80's. his book and
5. Under his DEA Analytical Lab Registration Numbers required to maintain the following records:	er PS0061616, Schedu	les I-V, Dr. SHULGIN
21 CFR 1304.27 - Records for chemical analysis	s	
(a)(2) The forms or forms in which the control manufactured by the registrant and the concer		
(a)(3) The total number of forms manufactured number if any of the person from who the contra		
(a)(4) The quantity distributed, exported or registrant (except quantities used in chemical including the date and manner of distribution name, address and registration number of each distributed or exported.	l analysis or other , exportation or des	laboratory work), truction, and the
5. On March 7, 1994, Dr. SHULGIN was a guest speak SHULGIN was introduced as the "Godfather of MDMA".	ker on "Live 105" Rand advised on the u	dio Talk Show. Dr. se of MDMA.
6. Dr. SHULGIN is also reportedly writing a book and Loved). Triptomines are LSD related compounds be conducting illegal Triptomine Research on Humans	. This indicates th	omines I have known at SHULGIN may also
INDEXING SECTION:		
1. SHULGIN, Alexander - NADDIS: 1904492, 294983 2. (b)(7)(C)		
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DEA Form — 6a (b)(7)(C) DEA SENSITIVE		

DRUG ENFORCEMENT ADMINISTRATION

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DRUG ENFORCEMENT ADMINISTRATION

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)(7)(C)				
3. On February 10, 1994, BMQA Inverse Federal Express Records documenting (b)(7)(C) Reference is made to Federal attachment #1)	delivery trans	eactions vice #4-7	for (b)(/)(C)	estigator (b)(7)(C),(b)(7)(F) ted 09/24/92. (See
(b)(7)(C) Date		lgin Ros	ıd	
(b)(7)(C)	<u> </u>			, ·
Service: 1 Economy Package Alexander SHULGIN's (b)(7)(C) A review of DEA records on address following: Name: SHULGIN, Alexander T.			rette, CA 94	549, revealed the
1483 Shulgin Rd. Lafayette, CA 94549 Occupation: Researcher Chem		,,,		
DEA Form — 6a (b)(7)(C) (May 1980) — DRUG ENFO	DEA SENSITIVE RCEMENT ADMINISTRA			

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	February 15,	1994
DEA records indicate that SHULGIN has illegally has allegedly trained clandestine lab operators. a clandestine drug chemist were photographed tog SHULGIN is registered with the DEA to handle constitution of the DEA shulgin Road Lafayette, CA 94549 Analytical Lab, Schedules 1, 3, 3N, 4, Expires 02/28/94, Approved 1971 Alexander T. SHULGIN had his DEA Researcher sche 1977 based on the withdrawal of the approval of the California Research Advisory Panel (CRAP). SHULGIN supplied Mescaline for a research projecting to an individual who was not registered with DEA Order Form (Case #R3-77-2007). CRAP also focuse of human subjects for research with a new in letters citing violations, attachment #2). 4. Reference is made to correspondence from DEA'S Alexander T. SHULGIN, PhD., RE: Order to Show PS0026206 dated June 9, 1977. This letter advis written response to DEA'S Order to Show Cause in Administrator has considered Dr. SHULGIN's response registration as a researcher in schedule I should attached DEA letter, attachment #3).	In a recent Texas ether in SHULGIN's trolled substances SHULGIN's schedule The Research Advise t at the Universit th the DEA and wit ound that SHULGIN c tvestigational drug (C) , Ac to Cause (Revocation tes Dr. SHULGIN that a lieu of a Hearing onse and concluded and be revoked effect	n PS0026206 revoked in I research projects by ory Panel found that y of California at San hout using an Offical onducted unauthorized. (See attched CRAP ting Chief Counsel, DEA,) DEA Registration t DEA received his and that the DEA that Dr. SHULGIN's tive immediately. (See
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5. PROGRAM CODE	6. DATE PREPARED	
	February 15,	1994
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See attched excerpt from SHULGIN's book docume	enting his illegal hu	man testing involving
experimental drugs (attachment #5).		
ATTACHMENTS:		
1. Federal Express Invoice, dated 09/24/92		
 Federal Express Invoice, dated 09/24/92 CRAP Correspondence 		
3. DEA Order to Show Cause Revocation Corresp	ondence, dated 06/09	1/77
4. SHULGIN's Protocol for MDMA Project		
5. Excerpt from Dr. SHULGIN's book		
INDEXING SECTION:		
1. (b)(7)(C)		
2. SHULGIN, Alexander T NADDIS: 1904492	294983	
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от приводения в применения в п	SHULGIN, Alexar	nder T.
Page of	1483 Shulgin Ro	
5. PROGRAM CODE 2 4	Lafavette, CA	
	6. DATE PREPARED	
	April 24, 1992	
3. Inquiries into NADDIS, Narcotic and Danger	ous Drugs Information	System
(EVZVO)	7)(C)	
NADDIS number	294983 is assigned to	Alexander
SHULGIN. The NADDIS record was initiated in Fe	bruary of 1975. Vari	ous reports
concerning Dr. SHULGIN have been made alleging	illegal activity invo	lving
clandestine laboratories and the manufacture of	designer drugs. The	NADDIS record
showed case file R3-85-2025 in which Dr. SHULGI investigation.	N was the subject of	the
Investigation:		
4. A review of case file R3-85-2025 documents	that an on gite invo	otication of the
doctor's registered location (residence) was co	nducted. The investi	stigation of the
on the belief that the doctor was mapufacturing	MDMA and shipping th	e cubetance to
unregistered locations. The investigation disc	losed no grounds for	criminal civil
or administrative action. The case was closed	on January 15, 1986.	CIRBINAL, CIVII
	, 10, 1000	
5. On April 20, 1992, Investigators (b)(7)(C),(b)(7)(F)		travelled to
1483 Shulgin Road, Lafayette, California in ord	er to meet with Dr. S	HIII.GIN. The
investigators spoke with the doctor's wife who	stated that the docto	r was not in and
would not be returning until later in the day.	Investigator (b)(7)(C),(b)(7)	gave Mrs.
his business card and requested that Dr	• SHULGIN contact him	as soon as
possible. At approximately 3:00 p.m., on April	20, 1992, Investigat	or (b)(7)(C),(b)(7)(F)
received a telephone call from Dr. SHULGIN. April 22, 1992.	rangements were made	for a meeting on
1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1		
6. On April 22, 1992, Investigators (b)(7)(C),(b)(7)(F)	again tray	elled to 1483
	tigators met with Dr.	SHILCIN and his
wife. The investigators presented their credent	tials and a DEA Notice	o of Inenection
(DEA-82) to Dr. SHULGIN. Dr. SHULGIN was inform	med of his rights reg	arding the
inspection and asked to read the Notice of Inste	ection. After reading	the form Dr
SHULGIN authorized the inspection by virtue of 4	is signature on the	form (attachment
signed as	witnesses, and a con	y of the Notice
of Inspection was provided to Dr. SHULGIN.		
7 m	-	
7. The investigators informed Ir. SHULGIN the	purpose of their visi	lt was to
determine the activities involving the 600 doong	e units of LSD that l	nad been sent to
him for analysis.		
8. Dr. SHULGIN stated that he had received the		
laboratory in San Francisco. Dr. SHULGIN showed	the investigation	rom the DEA
12 (receipt for cash or other items) that docume	anted the receipt	copy of a DEA-
atata docume	meed the recerbit. Di	. DHULGIN

DEA Form — 6a (May 1980)

(b)(7)(C)

controlled substance.

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stated he was requested to determine if the paper and the associated LSD were in fact one article or if the paper was merely a method for transportation of the

REPORT OF INVESTIGAT	1. FILE NO. GFR3-91-3009	2. G-DEP IDENTIFIER
(Continuation) Page 3 of 4	3. FILE TITLE SHULGIN, Alex 1483 Shulgin Lafayette, CA	Road
5. PROGRAM CODE	6. DATE PREPARED April 24, 19	92

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	9. According to Dr. SHULGIN he has acted in the capacity as consultant regarding controlled substances for nearly 30 years and he wants to "retire"
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	from that position.
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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	investigators a copy of a letter dated March 26, 1992 to (b)(7)(C) Senior
analysis being completed by Dr. (b)(7)(C) and the return of the unused LSD tabs	Forensic Chemist at the DEA Western Laboratory. The letter documents the
(attachment 2).	analysis being completed by Dr. (b)(7)(C) and the return of the upused ISD tabe
70	(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) 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 (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

DEA Form (May 1980) — 6a (b)(7)(C)

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		Lafayette, CA	
s. PROG	RAM CODE	6. DATE PREPARED April 24, 1992	

Division.

14. The investigators concluded the meeting and departed Dr. SHULGIN's residence.

15. On April 24, 1992, Investigator (F) then telephonically contacted confirmed the receipt of the LSD tabs from Dr. SHULGIN in March of 1997.

16. Based on the above, no action is deemed necessary. This report is for informational purposes only.

ATTACHMENTS:

- 1. DEA-82
- 2. Letter dated March 26, 1992

INDEXING SECTION:

1. SHULGIN, Alexander T. - NADDIS: 294983

DEA Form (May 1980) — 6a

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Previous edition may be used.

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 3-carbon 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"

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? How many hours after ingestion did you notice peak 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.

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Notes and References

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- 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.
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Next article



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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-quite-fictional 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 (http://www.erowid.org/) and The Lycaeum (http://www.lycaeum.org/) 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,

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

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."



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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



Dr. Alexander Shulgin Learn more about Dr. Shulgin

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REPORT OF INVESTIGATION (Continuation)	1. File No. IE-01-0017 3. File Title (b)(7)(C)	2. G-DEP Identifier (b)(7)(E)
4. Page 3 of 19 5. Program Code SEP-581	6. Date Prepared 01/02/01	
(7)(C)	31	

SHULGIN was registered as a researcher and analytical lab with DEA until 1/28/96 when his registration number was retired, the outcome of an Order to Show Cause (OTSC). This OTSC was issued after an inspection warrant conducted on his residence on 9/27/94 in Lafayette, CA, indicated that he was conducting unauthorized Schedule I research. Prior to these actions, his Naddis record lists a number of allegations regarding illicit actitivities. These allegations include using unauthorized Schedule I drugs and administering same to humans illegally; possibly acting as a consultant to major clandestine lab operators (allegations made circa 1977); involvement in the production and distribution of designer drugs (time period of allegation unk); using the Internet to communicate drug information and deliver drugs (allegations made circa 1994); and illegal use of chemicals and drugs on humans (allegations made circa 1995).

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(b)(7)(C)			

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5. By: (b)(7)(C),(b)(7)(F) SA			6. File Title		H N
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7. Closed Requested Action Completed Action Requested By:	ted	914000 MASSA	05-25-2010		
9. Other Officers: None.	****	SE.			
10. Report Re: Clarification of	DEA-6 dated	05-11-2010.		Walk C	
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"Phenethylamines a information, parap	re halluci	inogenic ch om PHIKAL h	nemicals" tr nv SHILGIN.	ne Iollowing First editi	ion.
Seventh Printing.	2007. is t	orovided.	Phenethylan	nines are	
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phenethylamine. T	he physiol	logical act	ion of pher	nethylamine	is that
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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 PIHKAL-A Chemical Love Story, 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 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 R3-95-0024, 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 PIHKAL (Phenethylamines I Have Known and Loved), A Chemical Love Story,

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(Continuation)	3. File Title (b)(7)(C)	
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5. Program Code	6. Date Prepared 05-11-2010	

Copyright 1991, Authored by Alexander Shulgin and Phenethylamines are hallucinogenic chemicals. An excerpt of the book's forward 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 Ann, 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"

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

9. On 10-27-1994, the Administrative Warrant, referenced herein, was executed at SHULGIN's residence in Layfayette, CA. which yielded 52 record keeping violations of the Controlled Substance Act, 21 USC 842(a). On 01-04-1996, SHULGIN signed a civil violations settlement agreement with the United States Attorney Michael Yamaguchi, on behalf of the United States of America, whereby SHULGIN voluntarily surrendered his controlled substance privileges as well as his DEA registration. SHULGIN agreed to a fine of \$25,000.00, paid to the U.S. Department of Justice.

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2. SHULGIN, Alexander NADDIS 294983, 1904492 REMARKS: Controlled substance analogue chemist.

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3 - Originating Office

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b)(7)(C)	

Alexander SHULGIN (NADDIS #294983) 1483 Shulgin Road Lafayette, CA

M204/NADDIS records list SHULGIN as the leading hallucinogenic chemist in the U.S., circa 1977. In 01/95, 25g of an MDMA-2 analog were seized from the subject. The subject's DEA registration was revoked in 04/94 for various offenses, including unauthorized Schedule 1 research. Registration was voluntarily surrendered in 01/96 upon a settlement and fine of \$25,000 $(\mbox{R3-93-2077})$.

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DEA Form (Aug. 1994) -6a (b)(7)(C)

(b)(7)(C)

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1-Prosecutor

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4. Page 7 of 11 5. Program Code	6. Date Prepared 01-27-2011	
(7)(C)		
[Analyst's Note: The DEA raided a labout BHULGIN (NADDIS 294983) in 1994. The bestory, and TiHKAL, The Continuation, around how to make illegal drugs. They also be tryptamines.]	oooks, PiHKAL, A C re believed to be	hemical Love used as cookbooks
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(b)(7)(C)		

(ANALYST NOTE: A QUERY OF SHULGIN IN NADDIS RESULTED IN A POSTIVE HIT WITH NADDIS NUMBER 294983 (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)(/)(C),(b)(/)(F)		
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U.S. Department of Justice

Drug Enforcement Administration			
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5. By: I/A (b)(7)(C),(b)(7)(F)	(b)(7)(C)	6. File Title	
At: San Francisco, CA		MDMA	
7. Closed Requested Action Completed Action Requested By: 9. Other Officers:		8. Date Prepared 1/23/01	
10. Report Re: The Rave Culture and	Drug Intelligence		
SYNOPSIS:			
On 1/11/01, I/A (b)(7)(C).(b)(7)(F) Rave & Club Culture/Design sponsored by the Californic class was taught by Sgt. (b)(7)(C).(E)(F) Department detective. (b)(7)(C).(E)(F)(F)(F)(F)(F)(F)(F)(F)(F)(F)(F)(F)(F)	ner Drugs" in San ia Narcotics Offi (7)(C),(b)(7)(F) a retir (D)(7) has been going	cer Association ed Torrance, CA	s class was (CNOA). This Police
DETAILS Detective (5)(7)(C).(b) gave the foculture and scene:	ollowing in-depth	overview of the	rave
1. The Rave Culture and F	History:		
Rave parties (hereafter ratevolved from disco via clubritain. Disk jockeys (Dimusic. This music came to music became really populate beyond the raves. The Sarthan any other place. At the influence.	ubs in Chicago, D J's hereafter) wo o the U.S. in 199 ar. But ecstasy n Francisco Bay A	etroit, New York rking together m O and by about 1 use, popular at rea has more rav	and Great ade techno 996, techno raves, has gone es and venues
2. The Music and Dance			
11. Distribution: Division see last page	12. Signature (Agent)		13. Date 11/07/01
District	1/A 14. Approved (Name and T	itle)	15. Date
Other	(b)(7)(C),(b)(7)(F)	HIPASTI HIPA	To Salo
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RaveIntel.doc

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	3. File Title MDMA	

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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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.
/NV7VEV
(b)(7)(E)
5 Pave 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.

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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

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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.

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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 $\underline{\text{before}}$ 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

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- 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 <u>HEADCASE makes</u> ballpark <u>hats with hidden compartments</u> 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).

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- 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 (b)(7)(C) 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.

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

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- 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 (b)(7)(F) obtained via the Internet from Amsterdam was "2CT7", which is not controlled, but causes hallucinations. He bought

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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 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.

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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.

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- 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.

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- 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
AD 5335598
1. ROCKMED - NADDIS Negative (WS) www.rockmed.org
2. A INSOMNIAC ENTERPRISES - NADDIS # 5021366. (WS) www.insomniac-usa.com
3 AT DANCE SAFE - NADDIS # 4996248
4 AD SHA-SHA SHOES - NADDIS Negative (WS) www.sha-sha.com 5335547
5 AD HOT TOPICS - NADDIS Negative 5335551
6 AD MR. RAGS - NADDIS Negative 5335554
7 AD GADZOOKS - NADDIS Negative 5835555
8 AD KIKWEAR - NADDIS Negative (WS) www.kikwear.com 5335570
9 AIHEADCASE - NADDIS Negative (WS) www.headcase.com 4997663
10 AT www.bluelight.nu - NADDIS # 5173242
11 AT SHULGIN, Alexander - NADDIS #294983
12 N www.ravedata.com - NADDIS Negative
13 N www.whois.com - NADDIS Negative
Distribution:
SFFD/Group 2
HIDTA/Clifton
Houston (I/A (b)(7)(C).(b)(7)(F)
NDAD, EPIC, SARI
7EV/7V/CV /EV/7V/CV
New Orleans $(I/A^{(0)(7)(C),(D)(7)(F)}$

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(b)(7)(C),(b)(7)(F)		
4 7 - (b)(7)(c),(b))(7)(F)	
4. At approximately 2202 hrs. S/A's (b)(7)(C).(b) male with collar length white hair at 1995 GMC van displaying California lid (b)(7)(C).(b)(7) recognized this man to be Dr. Sh show the registered owner of this van Shulgin at 1483 Shulgin Rd., Lafayette Dr. Shulgin at his Lafayette residence alleged methamphetamine lab investigate County Sheriff's Dept.) Surveillance, (b)(7)(C).(b)(7)(F) followed Dr. Shulgin to the E Lafayette, CA.	the open passenger cense plate number nulgin. California to be Alexander Se, CA. (Note: S/A) in December 1998 tion conducted by S/A's	a DMV records c or (b)(7)(c) b)(7)(c) (b)(7) had seen during an the Contra Costa
(b)(7)(C),(b)(7)(F)		

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5. Program Code SEP 581	6. Date Prepared 10/21/99
(b)(7)(C)	
CALIFORNIA LICENSE PLATE NUMBERS	
1. (b)(7)(C) 1995 GMC Van, Registered Owner Shulgin at 1438 Shulgin Rd., Lafayette,	
(b)(7)(C)	

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