

I. GENERAL (Complete for all submissions)

1. Purpose of Submission <input type="checkbox"/> Informant Establishment <input checked="" type="checkbox"/> G-DEP Classification <input type="checkbox"/> Arrest <input type="checkbox"/> Fugitive Declaration		2. File / Informant No. R3-95-0024		3. Program Code	
4. File Title SHULGIN, Alexander			5. G-DEP Identifier (b)(7)(E)		
6. Group No. Clan Lab			7. Date Prepared December 5, 1994		
8. Name (Last, First, Middle) SHULGIN, Alexander Theodore			9. Occupation Chemist, Author		
10. Address (No., Street, City, State/Country, Zip Code) 1483 Shulgin Road Lafayette, CA			11. Employer Name and Address Self Employed		
12. Phone No. & Area Code 510-934-1493	13. Date of Birth 06-17-25	14. Place of Birth (City, State/Country) Unknown		15. Citizenship (Country) U.S.	16. Ethnicity <input type="checkbox"/> Hispanic <input type="checkbox"/> Unknown <input checked="" type="checkbox"/> Non-Hispanic
17. Race <input checked="" type="checkbox"/> White <input type="checkbox"/> Black <input type="checkbox"/> American Indian/Eskimo <input type="checkbox"/> Asian/Pacific Islander <input type="checkbox"/> Unknown			18. Alien <input type="checkbox"/> Legal / Alien Reg. No. <input type="checkbox"/> Illegal		
19. Sex <input checked="" type="checkbox"/> M <input type="checkbox"/> F	20. Height 6' 03"	21. Weight 200 lbs	22. Eyes Blue	23. Hair Gray	24. Identifying Characteristics (scars, tatoos, etc.) Beard
25a. Driver's License No. Y0743101		25b. State/Country CA/USA	26a. Passport No. Unknown		26b. Issuing Country Unknown
25c. Expiration Date Unknown		26c. Expiration Date Unknown			
27. NADDIS No. 294983, 1904492		28. FBI No. None	29. Social Security No. Unknown		30. DEA Registration No. PS0061616
31. Aliases / Other Names					

II. INFORMANT ESTABLISHMENT (Complete as appropriate)

32. Category <input type="checkbox"/> Regular <input type="checkbox"/> Defendant <input type="checkbox"/> Restricted Use <input type="checkbox"/> Foreign Registry <input type="checkbox"/> For Payment Purposes Only			33. Initial Establishment <input type="checkbox"/> Initial Establishment <input type="checkbox"/> Reactivation		34. CIS No.
--	--	--	--	--	-------------

III. G-DEP CLASSIFICATION (Complete for all G-DEP and Arrest Submissions)

35. Submission <input type="checkbox"/> Initial <input checked="" type="checkbox"/> Supplemental	36. Class of Violator (b)(7)(E)	37. G-DEP Drug Code Under Which Classified
--	------------------------------------	--

IV. ARREST (Complete for all Arrest Submissions)

38. Date of Arrest		39. PLACE OF ARREST			
		a. City	b. County		c. State / Country
40a. Armed at Arrest <input type="checkbox"/> Yes <input type="checkbox"/> No	40b. If Armed (enter Number of Weapons by Type)				41a. Type of Violation (Possession, Sale, etc.)
	TYPE	Handgun	Rifle	Shotgun	Lethal Cutting Instrument
	Semi - Auto				
	Full Auto				
	Other				
					41b. Major Drug Violator was Charged With (Heroin, cocaine, etc.)

V. FUGITIVE DECLARATION (Complete as appropriate)

42. Type <input type="checkbox"/> Prearrest <input type="checkbox"/> Post Arrest	43. NCIC No.	44. Apprehension Responsibility <input type="checkbox"/> DEA <input type="checkbox"/> USMS	45. DEA Contact Person (Name and Phone No. - include Area Code)	
46. Warrant No.	47. Date / Place of Issue (City & State)		48. USMS Office Holding Warrant (City & State)	

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)(C),(b)(7)(F)	61. DATE 18-5-94
62. SUPERVISOR'S NAME (Print or Type) (b)(7)(C),(b)(7)(F) G/S			64. DATE 12/5/94
65. REVIEWED BY			<input type="checkbox"/> YES <input type="checkbox"/> NO
HEADQUARTERS APPROVAL (If appropriate)			
68. REVIEWED BY	69. Office Symbol	70. CONCURRENCE <input type="checkbox"/> YES <input type="checkbox"/> NO	71. DATE

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

REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

1. HOW OBTAINED (Check) Purchase Seizure Free Sample
 Lab. Seizure Money Flashed Compliance Sample (Non-Criminal)
 Other (Specify)

2a. FILE NO. R3-95-0024

2b. PROGRAM CODE

3. G-DEP ID (b)(7)(E)

4a. WHERE OBTAINED (City, State/Country) Lafayette, CA

4b. DATE OBTAINED 10-27-94

5. FILE TITLE SHULGIN, Alexander

6a. REFERRING AGENCY (Name)

6b. REFERRAL Case No. OR Seizure No. No.

7. DATE PREPARED November 2, 1994

8. GROUP NO. 6

9. Exhibit No.	10. FDIN (8 characters)	11. ALLEGED DRUGS	12. MARKS OR LABELS (Describe fully)	APPROX. GROSS QUANTITY		15. Purchase Cost
				13. Seized	14. Submitted	
1	L22556	PEYOTE CACTUS			975.3 g	0.0
2	L22557	PEYOTE CACTUS			167.8 g	0.0
3	L22558	PEYOTE CACTUS			241.0 g	0.0

16. WAS ORIGINAL CONTAINER SUBMITTED SEPARATE FROM DRUG? NO (Included above) YES (If Yes, enter exhibit no. and describe original container fully)

REMARKS:

On October 27, 1994, the above exhibits were seized pursuant to a Federal Administrative Inspection Warrant from 1483 Shulgin Road, Lafayette, CA. TFA (b)(7)(C),(b)(7)(F) transported the exhibits to SFFD where he processed them as evidence as witnessed by S/A (b)(7)(C),(b)(7)(F). The exhibits were then transferred to the Western Regional Laboratory for analysis. (b)(7)(C),(b)(7)(F)

17. SU (b)(7)(C),(b)(7)(F)

18. (b)(7)(C),(b)(7)(F)

EVIDENCE

19. No. PACKAGE (b)(7)(C),(b)(7)(F) 3H5EE

20. (b)(7)(C),(b)(7)(F)

21. TITLE TFA

22. SEAL Broken Unbrk

23. (b)(7)(C),(b)(7)(F)

24. TITLE E.C.

LABORATORY ANALYSIS/COMPARISON REPORT

25. ANALYSIS SUMMARY AND REMARKS

Exhibit #1 Net Wt. 869.1g - cactus containing mescaline

Exhibit #2 Net Wt. 106.4g - cactus containing mescaline

Exhibit #3 Net Wt. 197.6g - cactus containing mescaline

26. Exhibit No.	27. Lab. No.	28. ACTIVE DRUG INGREDIENT (Established or Common Name)	WEIGHT PER UNIT ANALYZED			32. TOTAL NET	33. RESERVE
			29. Strength	30. Measure	31. Unit		
1		Mescaline					581.1g
2		Mescaline					62.2g
3		Mescaline					105.2g

34. ANALYST (Signature) (b)(7)(C),(b)(7)(F)

35. TITLE Forensic Chemist

36. DATE COMPLETED 01/11/95

37. APPROVED BY (b)(7)(C),(b)(7)(F)

38. TITLE Laboratory Director

39. LAB. LOCATION San Francisco, CA

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

REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

1. HOW OBTAINED (Check) Purchase Seizure Free Sample
 Lab. Seizure Money Flashed Compliance Sample (Non-Criminal)
 Other (Specify)

2a. FILE NO. **R3-95-0024**

2b. PROGRAM CODE

3. G-DEP ID **(b)(7)(E)**

4a. WHERE OBTAINED (City, State/Country) **Lafayette, CA**

4b. DATE OBTAINED **10-27-94**

5. FILE TITLE **SHULGIN, Alexander**

6a. REFERRING AGENCY (Name)

6b. REFERRAL Case No. OR Seizure No. No.

7. DATE PREPARED **November 2, 1994**

8. GROUP NO. **6**

9. Exhibit No.	10. FDIN (8 characters)	11. ALLEGED DRUGS	12. MARKS OR LABELS (Describe fully)	APPROX. GROSS QUANTITY		15. Purchase Cost
				13. Seized	14. Submitted	
4	L22559	PEYOTE CACTUS			33.7 g	0.0
5	L22560	PEYOTE CACTUS			355.9 g	0.0
6	L22561	PEYOTE CACTUS			37.1 g	0.0

16. WAS ORIGINAL CONTAINER SUBMITTED SEPARATE FROM DRUG? NO (Included above) YES (If Yes, enter exhibit no. and describe original container fully)

REMARKS:

On October 27, 1994, the above exhibits were seized pursuant to a Federal Administrative Inspection Warrant from 1483 Shulgin Road, Lafayette, CA. TFA (b)(7)(C),(b)(7)(F) transported the exhibits to SFPD where he processed them as evidence as witnessed by S/A (b)(7)(C),(b)(7)(F). The exhibits were then transferred to the Western Regional Laboratory for

17. SUB TFA

18. A G

19. No. 3 HS

20. SEA Broke

21. TITLE TFA

22. TITLE E.E.

ANALYSIS/COMPARISON REPORT

25. ANALYSIS SUMMARY AND REMARKS

Exhibit #4 Net Wt. 6.3g - cactus containing mescaline
 Exhibit #5 Net Wt. 229.8g - cactus containing mescaline
 Exhibit #6 Net Wt. 7.0g - cactus containing mescaline

26. Exhibit No.	27. Lab. No.	28. ACTIVE DRUG INGREDIENT (Established or Common Name)	WEIGHT PER UNIT ANALYZED			32. TOTAL NET	33. RESERVE
			29. Strength	30. Measure	31. Unit		
4		Mescaline					0.6g
5		Mescaline					168.0g
6		Mescaline					0.6g

34. ANALYST (Signature) (b)(7)(C),(b)(7)(F)

35. TITLE Forensic Chemist

36. DATE COMPLETED 01/11/95

37. APPROVED BY (b)(7)(C),(b)(7)(F)

38. TITLE Laboratory Director

39. LAB. LOCATION San Francisco, CA



DISPOSITION OF DRUG EVIDENCE

(Do NOT Use For Non-Drug Evidence)

FILE NUMBER
R3-95-0024

DATE
9/9/96

FILE TITLE
SHULGIN, Alexander

ORIGINATOR (Name of Field Office and Case Agent)
San Francisco Field Division

CUSTODIAN (Name of DEA Laboratory and Laboratory Chief)
Western Regional Laboratory

S/A (b)(7)(C),(b)(7)(F)

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

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)

Exhibit No.	Laboratory No.	AGENT Drug	LABORATORY			
			Transferred	Destroyed	Retained	Stock
1	L22556	Peyote Cactus		X		
2	L22557	Peyote Cactus		X		
3	L22558	Peyote Cactus		X		
4	L22559	Peyote Cactus		X		
5	L22560	Peyote Cactus		X		
6	L22561	Peyote Cactus		X		

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

9/9/96

CASE AGENT (Signature)

DATE

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

DATE

PART II

On 12-3-96 the foregoing exhibits were disposed of as indicated above.
(Date)

On _____ the foregoing exhibits were transferred to _____
(Date)

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

12/4/96

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

12-4-96

EVIDENCE

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

LABORATORY CHIEF (Signature and Date)

REMARKS

SEP 12 1 14 PM '96

REPORT OF INVESTIGATION

Page 1 of 1

1. Program Code	2. Cross File	Related Files	3. File No. R3-95-0024	4. G-DEP Identifier (b)(7)(E)
5. By: (b)(7)(C),(b)(7)(F) S/A At: Task Force I San Francisco, CA	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		6. File Title SHULGIN, Alexander	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:			8. Date Prepared 2-20-97	
9. Other Officers: None				
10. Report Re: Case Closure				

DETAILS:

- As of the prepared date of this report, this case is presently in the below checked status for the purpose of the CAST SUBSYSTEM RECORD.
 - _____ ACTIVE = A
 - _____ PENDING JUDICIAL = J
 - _____ PENDING FUGITIVE = F
 - _____ CIVIL ACTION PENDING = C
 - _____ DRUG DESTRUCTION PENDING = D
 - _____ APPEAL PENDING = P
 - _____ ADMINISTRATIVE CLOSE = AC
 - X NORMAL CLOSE = NC
- On 9/10/96, D/I (b)(7)(C),(b)(7)(F) informed S/A (b)(7)(C),(b)(7)(F) that Alexander SHULGIN had surrendered his DEA Registration and paid a \$25,000.00 civil fine to the Government. D/I (b)(7)(C),(b)(7)(F) also told S/A (b)(7)(C),(b)(7)(F) that all civil action against SHULGIN was complete.
- All required DEA-6's have been completed and submitted in the case.
- DEA Form 48 have also been completed and submitted in this case. As of 12-3-96, all DEA Form 48s have been returned and all drug evidence has been destroyed. No non-drug evidence was seized. No arrest was made, therefore no DEA Form 210 is required.
- Based on the above facts that all administrative and judicial procedures have been completed, this case is considered closed.

INDEXING SECTION:

- SHULGIN, Alexander - NADDIS #294983.

11. Distribution: SARI, DOS	12. (b)(7)(C),(b)(7)(F)	13. Date 2/20/97
Division	14. (b)(7)(C),(b)(7)(F)	15. Date 2/20/97
District		
Other: Diversion D/I (b)(7)(C),(b)(7)(F)		
DEA Form (Aug. 1994) - 6 (b)(7)(C),(b)(7)(F)	DEA SENSITIVE Drug Enforcement Administration	

1 - Prosecutor

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

02/11/97

R3-95-0024

CASE HAS BEEN CONSOLIDATED - IN FINAL FILE

R3-95-0024 12/03/96

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

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

2/11/97

CASESUM
13 JAN 97

COMPUTERIZED ASSET PROGR
SUMMARY - ALL EXHIBITS WITHIN A CASE
CASE NUMBER: R3950024

13:20:21

TOTAL VALUE OF ALL ASSETS: \$0.00

SYSID	EXHIBIT	DESCRIPTION OF PROPERTY	SEIZURE DATE	VALUE
-------	---------	-------------------------	-----------------	-------

*** END OF REPORT ***

There was no assets seized.

ENTER L = LOGOFF M204 Q = RETURN TO SYSTEM MENU M = RETURN TO PREVIOUS MENU-
S = RETURN TO INPUT SCREEN OR HIT ENTER

+

L 22/24 C 3

REPORT OF INVESTIGATION

Page 1 of 1

1. Program Code	2. Cross File	Related Files	3. File No. R3-95-0024	4. G-DEP Identifier (b)(7)(E)
5. By: (b)(7)(C),(b)(7)(F) S/A At: Task Force I San Francisco, CA	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		6. File Title SHULGIN, Alexander	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:			8. Date Prepared September 10, 1996	
9. Other Officers: None				
10. Report Re: Case Status				

DETAILS:

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

- _____ ACTIVE = A
- _____ PENDING JUDICIAL = J
- _____ PENDING FUGITIVE = F
- _____ CIVIL ACTION PENDING = C
- X DRUG DESTRUCTION PENDING = D
- _____ APPEAL PENDING = P
- _____ ADMINISTRATIVE CLOSE = AC
- _____ NORMAL CLOSE = NC

2. On 9-10-96, S/A (b)(7)(C),(b)(7)(F) spoke to Diversion Investigator (b)(7)(C),(b)(7)(F) regarding this case. D/I (b)(7)(C),(b)(7)(F) told S/A (b)(7)(C),(b)(7)(F) that all civil action against Alexander SHULGIN was complete. SHULGIN surrendered his DEA registration and paid a \$25,000.00 civil fine to the Government.

3. On 9-10-96, S/A (b)(7)(C),(b)(7)(F) submitted DEA-48's for destruction of the drug evidence. Once completed this case will be closed.

INDEXING SECTION:

1. SHULGIN, Alexander - NADDIS #294983.

11. Distribution: SARI	12. (b)(7)(C),(b)(7)(F)	13. Date 9/10/96
Division	14. (b)(7)(C),(b)(7)(F)	15. Date 9/10/96
District		
Other: Diversion, D/I (b)(7)(C),(b)(7)(F)		

DEA Form - 6
(Aug. 1994)

DEA SENSITIVE
Drug Enforcement Administration

3 - Originating 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.

Previous edition dated 5/80 may be used.

REPORT OF INVESTIGATION

1. Program Code		2. Cross File <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Related Files	3. File No. R3-95-0024	4. G-DEP Identifier (b)(7)(E)
5. By: (b)(7)(C),(b)(7)(F) TFA	At: Clan Lab Task Force San Francisco, CA			6. File Title SHULGIN, Alexander	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:		9. Other Officers: None			
10. Report Re: Case Status					

DETAILS:

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

- _____ ACTIVE = A
- _____ PENDING JUDICIAL = J
- _____ PENDING FUGITIVE = F
- X CIVIL ACTION PENDING = C
- _____ DRUG DESTRUCTION PENDING = D
- _____ APPEAL PENDING = P
- _____ ADMINISTRATIVE CLOSE = AC
- _____ NORMAL CLOSE = NC

INDEXING SECTION: None

11. Distribution: SARI	(b)(7)(C),(b)(7)(F)	13. Date 4-18-96
Division		15. Date 4/18/96
District		
Other		

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

DEA SENSITIVE
Drug Enforcement Administration

3 - Originating 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.

Previous edition dated 5/80 may be used.

REPORT OF INVESTIGATION

1. Program Code	2. Cross File	Related Files	3. File No. R3-95-0024	4. G-DEP Identifier (b)(7)(E)
5. By: (b)(7)(C),(b)(7)(F) TFA At: Clan Lab Task Force San Francisco, CA	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		6. File Title SHULGIN, Alexander	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:			8. Date Prepared October 16, 1995	
9. Other Officers: None				
10. Report Re: Change in G-Dep Identifier.				

DETAILS:

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

(b)(7)(E)

INDEXING SECTION:

NONE

11. Distribution: SARI, OW
Division
District
Other

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

13. Date
10/19/95
15. Date
10/19/95

DEA Form - 6
(Aug. 1994)

DEA SENSITIVE
Drug Enforcement Administration

3 - Originating 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.

Previous edition dated 5/80 may be used.

REPORT OF INVESTIGATION

1. Program Code	2. Cross File File	Related Files	3. File No. R3-95-0024	4. G-DEP Identifier (b)(7)(E)
5. By: (b)(7)(C),(b)(7)(F) TFA At: Cian Lab Task Force San Francisco, CA	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		6. File Title SHULGIN, Alexander	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:			8. Date Prepared October 3, 1995	
9. Other Officers: None				
10. Report Re: Case Status				

DETAILS:

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

- _____ ACTIVE = A
- _____ PENDING JUDICIAL = J
- _____ PENDING FUGITIVE = F
- X CIVIL ACTION PENDING = C
- _____ DRUG DESTRUCTION PENDING = D
- _____ APPEAL PENDING = P
- _____ ADMINISTRATIVE CLOSE = AC
- _____ NORMAL CLOSE = NC

2. On October 3, 1995, TFA (b)(7)(C),(b)(7)(F) spoke to Diversion Investigator (D/I) (b)(7)(C),(b)(7)(F) regarding this investigation. D/I (b)(7)(C),(b)(7)(F) told TFA (b)(7)(C),(b)(7)(F) that SHULGIN is still pending Civil Action by the U.S. Government and requested this investigation remain active.

INDEXING SECTION:

1. SHULGIN, Alexander - NADDIS not available.

11. Distribution: SARI, OW	1 (b)(7)(C),(b)(7)(F)	13. Date 10-10-95
Division		ent
District		13. Date 10/11/95
Other (b)(7)(C),(b)(7)(F)	1	Supervisor

DEA Form - 6
(Aug. 1994)

DEA SENSITIVE
Drug Enforcement Administration

3 - Originating 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.

REPORT OF INVESTIGATION

Page 1 of 1

1. Program Code	2. Cross File Related Files	3. File No. R3-95-0024	4. G-DEP Identifier (b)(7)(E)
5. By: (b)(7)(C),(b)(7)(F) TFA At: Clan Lab Task Force San Francisco, CA	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	6. File Title SHULGIN, Alexander	8. Date Prepared June 28, 1995
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:			
9. Other Officers: None			
10. Report Re: Quarterly Status: (C) Change from Previous Month Yes _ No <u>X</u> .			

DETAILS:

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

- _____ ACTIVE = A
- _____ PENDING JUDICIAL = J
- _____ PENDING FUGITIVE = F
- X CIVIL ACTION PENDING = C
- _____ DRUG DESTRUCTION PENDING = D
- _____ APPEAL PENDING = P
- _____ ADMINISTRATIVE CLOSE = AC
- _____ NORMAL CLOSE = NC

INDEXING SECTION:

None.

11. Distribution: AMRI, OW	(b)(7)(C),(b)(7)(F)	13. Date 070395
Division		15. Date 7/5/95
District		
Other		

DEA Form - 6
(Aug. 1994)

DEA SENSITIVE
Drug Enforcement Administration

3 - Originating 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.

Previous edition dated 5/80 may be used.

REPORT OF INVESTIGATION

1. Program Code (b)(7)(C),(b)(7)(F) TFA		2. Cross File <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Related Files	3. File No. R3-95-0024	4. G-DEP Identifier (b)(7)(E)
5. By: At: Clan Lab Task Force San Francisco, CA				6. File Title SHULGIN, Alexander	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:		8. Date Prepared May 1, 1995			
9. Other Officers: None					
10. Report Re: Quarterly Status: (C) Change from Previous Month Yes <u>X</u> No <u> </u>					

DETAILS:

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

- _____ ACTIVE = A
- _____ PENDING JUDICIAL = J
- _____ PENDING FUGITIVE = F
- X CIVIL ACTION PENDING = C
- _____ DRUG DESTRUCTION PENDING = D
- _____ APPEAL PENDING = P
- _____ ADMINISTRATIVE CLOSE = AC
- _____ NORMAL CLOSE = NC

2. On May 2, 1995, TFA (b)(7)(C),(b)(7)(F) was advised by Diversion Investigator (D/I) (b)(7)(C),(b)(7)(F) that on April 14, 1995, SHULGIN was served with a Notice to Show Cause. D/I (b)(7)(C),(b)(7)(F) is seeking a Federal Civil Complaint in the Northern District of California. D/I (b)(7)(C),(b)(7)(F) requests this investigation remain active, pending the Federal Civil Complaint.

INDEXING SECTION:

None.

11. Distribution: AMRI, OW	12 (b)(7)(C),(b)(7)(F)	13. Date 5-12-95	
Division		14	15. Date 5/12/95
District			
Other (b)(7)(C),(b)(7)(F)			

DEA Form - 6 (Aug. 1994)

DEA SENSITIVE
Drug Enforcement Administration

3 - Originating 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.

Previous edition dated 5/80 may be used.

REPORT OF INVESTIGATION

1. PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE NO. R3-95-0024	4. CASE IDENTIFIER (b)(7)(E)
5. BY: (b)(7)(C),(b)(7)(F) TFA AT: Clan Lab Task Force San Francisco, CA	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		6. FILE TITLE SHULGIN, Alexander	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:			8. DATE PREPARED November 1, 1994	
9. OTHER OFFICERS: See paragraph "Other officers".				
10. REPORT RE: Execution of Federal Administrative Inspection Warrant and acquisition of drug exhibits 1 through 6.				

DEFENDANTS: Alexander SHULGIN
 DOB: 06/17/25
 POB: Unknown
 ADDRESS: 1483 Shulgin Rd., Lafayette, CA
 CA Driver's License: Y074301

VIOLATION: 11363 Calif. Health and Safety Code, Planting, Cultivating, and Processing Peyote.

JUDICIAL DISTRICT: Contra Costa County District Attorney's Office.

DATE AND TIME OF INCIDENT: October 27, 1994, at 9:00 am.

CUSTODY OF EVIDENCE:

DRUG EXHIBITS:

- On October 27, 1994, a Federal Administrative Inspection Warrant was executed at 1483 Shulgin Road, Lafayette, CA. Exhibits 1 through 6 were seized by TFA (b)(7)(C),(b)(7)(F). TFA (b)(7)(C),(b)(7)(F) transported the exhibits to the SFFD where he processed them as evidence. TFA (b)(7)(C),(b)(7)(F) later transported the exhibits to the Western Regional Laboratory for analysis.
 - Exhibits 1 through 6 was located on the porch near the sliding glass door which accesses the kitchen of said address.
- Exhibit 1 - is alleged Peyote Cactus.

11. DISTRIBUTION: MRI, ODC

REGION

DISTRICT

OTHER D/I (b)(7)(C),(b)(7)(F) Div., SFFD

13. DATE

11/3/94

15. DATE

11/3/94

(b)(7)(C),(b)(7)(F) DEA Form 6 (May 1980)

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

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

REPORT OF INVESTIGATION (Continuation)	1. FILE NO. R3-95-0024	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE SHULGIN, Alexander	
4. Page 2 of 3	6. DATE PREPARED November 1, 1994	
5. PROGRAM CODE		

Exhibit 2 - is alleged Peyote Cactus.

Exhibit 3 - is alleged Peyote Cactus.

Exhibit 4 - is alleged Peyote Cactus.

Exhibit 5 - is alleged Peyote Cactus.

Exhibit 6 - is alleged Peyote Cactus.

NON-DRUG EXHIBITS:

None.

ACTION ON DEFENDANTS:

1. On October 27, 1994, a Federal Administrative Inspection Warrant was executed at above said address. While at the residence, TFA (b)(7)(C),(b)(7)(F) observed in plain view several alleged Peyote Cactus in clay pots on the porch next to the sliding door which accesses the kitchen of said address. SHULGIN was not arrested pending test results of exhibits 1 through 6 and review by the Contra Costa County District Attorney's Office.

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
8. Chemist (b)(7)(C),(b)(7)(F)

CALIFORNIA DEPARTMENT OF JUSTICE, BUREAU OF NARCOTIC ENFORCEMENT:

- (b)(7)(C),(b)(7)(F) 1. S/A

CONTRA COSTA COUNTY DISTRICT ATTORNEY'S OFFICE:

1. Investigator (b)(7)(C),(b)(7)(F)

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

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

This report is the property of the Drug Enforcement Administration.

Neither it nor its contents may be disseminated outside the Agency to which loaned.

Previous edition may be used.

REPORT OF INVESTIGATION (Continuation)	1. FILE NO. R3-95-0024	2. CASE IDENTIFIER (b)(7)(E)
	3. FILE TITLE SHULGIN, Alexander	
4. Page 3 of 3	6. DATE PREPARED November 1, 1994	
5. PROGRAM CODE		

2. Investigator (b)(7)(C),(b)(7)(F)
3. Deputy D.A. (b)(7)(C),(b)(7)(F)

DETAILS:

1. Reference is made to DEA-6 File number R3-93-2077, G-Dep (b)(7)(E) prepared by D/I (b)(7)(C),(b)(7)(F) dated October 27, 1994.
2. On October 27, 1994, at approximately 9:00 am, the above mentioned officers executed a Federal Administrative Inspection Warrant at 1483 Shulgin Road, Lafayette, CA, because SHULGIN is a DEA registrant and is known to possess chemicals used to manufacture controlled substances. TFA (b)(7)(C),(b)(7)(F) observed in plain view several alleged Peyote Cactus in clay pots on the porch near the sliding glass door which accesses the kitchen of said residence.
4. TFA (b)(7)(C),(b)(7)(F) contacted TFA (b)(7)(C),(b)(7)(F) TFA (b)(7)(C),(b)(7)(F) removed the alleged Peyote Cactus from the clay pots and seized them as evidence.
5. D/I (b)(7)(C),(b)(7)(F) debriefed Alexander SHULGIN regarding the Peyote.
6. SHULGIN was not arrested pending further investigation.
7. TFA (b)(7)(C),(b)(7)(F) contacted via telephone Deputy District Attorney (b)(7)(C),(b)(7)(F) who declined to prosecute SHULGIN for possession of the Peyote.
8. TFA (b)(7)(C),(b)(7)(F) obtained a copy of the Administrative Inspection Warrant, dated 10/06/94, issued by Magistrate Woodruff of the Northern District of California. A copy of this warrant has been placed in this case file.

INDEXING SECTION:

1. SHULGIN, Alexander: NADDIS #294983.

REFERENCE REQUEST - FEDERAL RECORDS CENTERS

NOTE: Use a separate form for each request.

SECTION I - TO BE COMPLETED BY REQUESTING AGENCY

ACCESSION NO.

AGENCY BOX NUMBER

RECORDS CENTER LOCATION NUMBER

170-03-0001

2 OF 23

332300 - 332322

DESCRIPTION OF RECORD(S) OR INFORMATION REQUESTED

BOX

FOLDER (include file number and title)

23-95-0024

stulgin, alexander

REMARKS

NATURE OF SERVICE

FURNISH COPY OF RECORD(S) ONLY

PERMANENT WITHDRAWAL

TEMPORARY LOAN OF RECORD(S)

REVIEW

OTHER (Specify)

SECTION II - FOR USE BY RECORDS CENTER

RECORDS NOT IN CENTER CUSTODY

RECORDS DESTROYED

WRONG ACCESSION NUMBER - PLEASE RECHECK

WRONG BOX NUMBER - PLEASE RECHECK

WRONG CENTER LOCATION - PLEASE RECHECK

ADDITIONAL INFORMATION REQUIRED TO IDENTIFY RECORDS REQUESTED

MISSING (Neither record(s), information nor charge card found in container(s) specified)

RECORDS PREVIOUSLY CHARGED OUT TO (Name, agency and date):

REMARKS

DATE

SERVICE

TIME REQUIRED

SEARCHER'S INITIALS

SECTION III - TO BE COMPLETED BY REQUESTING AGENCY

NAME OF REQUESTER
(b)(7)(C), (b)(7)(F)

DATE

11-7-14

RECEIPT OF RECORDS

NAME AND ADDRESS OF AGENCY

Drug Enforcement Administration
450 Golden Gate Ave., PO Box 36035
San Francisco, CA 94102

Requester please sign, date and return this form, for file item(s) listed above, ONLY if the block to right has been checked by the Records Center.

SIGNATURE

DATE

SN 7540-00-682-6423
111-108

PREVIOUS EDITION USABLE

OPTIONAL FORM 11 (Rev. 7-87)
NATIONAL ARCHIVES AND
RECORDS ADMINISTRATION

JKILB4RG

Standard

To 

DRIVE ENFORCEMENT ADMINISTRATION, 450 GOLDEN GATE AVE., P.O.
BOX 36035
SAN FRANCISCO, CA, 94102

Transfer
USPS

Temporary Loan of Records
N/A

F:

File ~

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

DE A S E N S I T I V E 00020
ATTN: ODC, SPECIAL TESTING LABORATORY, OPR. (b)(7)(C),(b)(7)(F)

SUBJECT: SURRENDER OF DEA REGISTRATION, PAYMENT OF \$25,000.00 FINE BY CHEMIST ALEXANDER SHULGIN
REF: R3-93-2077, GDEP (b)(7)(E) REF TEL 00662, 00621, 0065

96 JAN 11 11 33 39
COMMUNICATIONS SECTION

SECRET

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 SFFD CLAN LAB GROUP, ASSISTED BY DEA CHEMIST (b)(7)(C),(b)(7)(F) OF SPECIAL TESTING, THE CONTRA COSTA COUNTY DISTRICT ATTORNEY'S OFFICE, SHERIFF'S DEPARTMENT, FIRE DEPARTMENT AND HEALTH DEPARTMENT WORKED JOINTLY IN SERVING A DEA ADMINISTRATIVE INSPECTION WARRANT AND A CRIMINAL ENVIRONMENTAL HAZARD SEARCH WARRANT ON ALEXANDER SHULGIN'S 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)

(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) OR

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

INDEXING SECTION:

ALEXANDER SHULGIN: NADDIS: 294983, 1904492

BT

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

SFFD - 00020

NNNN



U.S. Department of Justice
Drug Enforcement Administration

R3-95-0024

Washington, D.C. 20537

APR 14 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.
2. 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.

4. 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.
5.
 - a. On September 27, and October 27, 1994, during an administrative inspection of your registered location by DEA, you were found to be conducting research involving Schedule I controlled substances, not authorized under, nor coincident to, your analytical laboratory registration in violation of 21 C.F.R. § 1301.22(b)(3) and 21 U.S.C. § 844. You told investigators that you were conducting research, related to the manufacture of therapeutics, with the Schedule I controlled substances 2CB aka Nexus, methcathinone, MDMA, and their analogs. This activity was also in violation of California Health and Safety Code §§ 11401 and 11054-55. You also failed to maintain any records documenting your manufacture of these substances.
 - b. On September 27, 1994, during an administrative inspection of the area of the registered location described as the laboratory, investigators found 3.42 grams of 2C-B, and 0.9 grams of Methcathinone, both Schedule I controlled 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. This activity constitutes a violation of 21 U.S.C. § 841(a)(1). In addition, you also stored numerous controlled substances analogs without the documentation required by the California Health and Safety Code § 11400 et seq.

- 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 failed to maintain any records of such manufacture as required by 21 C.F.R. § 1304.03.
- e. On September 27, 1994, during an administrative inspection of the area of the registered location described as the library/computer room, investigators found on top of a file cabinet a vial labelled "N-Anhydroxy MDMA", plastic bags containing unidentified powder marked with dates and the letters "AD", a commercial package of the Schedule II controlled substance Marinol, and a liquid that you identified as a "homolog" of LSD. You stated that you had no records of the materials stored in this room although subsequent laboratory testing by DEA confirmed the presence of controlled substances.
- f. On September 27, 1994, during an administrative inspection of the area of the registered location described as Basement #4, investigators found scattered on a table, various samples and substances ostensibly sent to you for analysis. You stated that some samples that you receive are controlled substances, others are not. You stated that you have not kept a log book documenting receipt of samples for several years. DEA subsequently seized some of these substances and identified them as Schedule I controlled substances by laboratory testing. You failed to maintain any record of receipt or identification for these substances. Furthermore, you had no DEA approval to do anonymous testing and were unable to distinguish whether any controlled substances were received as evidentiary material for analysis. You also identified certain liquid and powder samples as the Schedule I controlled

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

- g. 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 substances. Furthermore, you had no DEA approval to do anonymous testing and were unable to distinguish whether any controlled substances were received as evidentiary material for analysis. You failed to maintain controlled substance receipt records, and manufacturing and destruction records in violation of 21 C.F.R. § 1304.03 and § 1304.27, and 21 U.S.C. § 842(a)(5).
 - h. In April 1994, you also failed to properly complete DEA 222 forms for your commercial order and receipt of ethyltriptamine acetate and methylamino propiophenone Hcl, both Schedule I controlled substances.
 - i. You conducted human drug research with methcathinone analogs in violation of Federal Food, Drug, and Cosmetic Act, in that you failed to secure an approval for an investigational new drug application (IND) under 21 U.S.C. § 360aa or a new drug application (NDA) under 21 U.S.C. § 355(a), or maintain the required clinical testing records required by 21 U.S.C. § 331(e) and § 355(i), and 21 C.F.R. § 312.
6. In June 1991, you ordered and received 50 grams of cocaine, a Schedule II controlled substance, which you synthesized into 2, 3 Anhydroecgonine. 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.

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



Deputy Assistant Administrator
Office of Diversion Control

cc: Hearing Clerk
Office of Administrative Law Judges

bcc: Mr. (b)(7)(C),(b)(7)(F) OD
Mr. (b)(7)(C),(b)(7)(F) ODO
Mr. (b)(7)(C),(b)(7)(F) ODOC
Lg/S (b)(7)(C),(b)(7)(F)
DEA San Francisco Field Division

DRUG ENFORCEMENT ADMINISTRATION
CLANDESTINE LABORATORY TASK FORCE
OPERATION PLAN

Date: 10/27/94 Case # R3-95-0024 R3-93-2071 G-DEP (b)(7)(E) File Title: SHULGIJ

NATURE OF OPERATION

Search Warrant: Buy/Bust: Buy/Walk: Surveillance: Controlled Delivery:

Other: ADMINISTRATIVE INSPECTION

LOCATION

Address: 1483 SHULGIJ RD City: LAFAYETTE

Directions: HWY 24 EAST, PLEASANT HILL RD EXIT → PROCEED NORTH
R ON SHULGIJ RD

TIME OF OPERATION: 9:00AM

Case Agent(s): (b)(7)(C),(b)(7)(F) / (b)(7)(C),(b)(7)(F)

Supervisor: (b)(7)(C),(b)(7)(F)

OPERATIONAL SUMMARY

SEED DIVERSION TO SERVE ADMINISTRATIVE INSPECTION WARRANT AT
LOCATION. CONTRA COSTA DA TO SERVE ADDITIONAL WARRANT.
LOCATION IS CONFIRMED SITE OF LABORATORY AND CHEMICAL
STORAGE

U/C AGENT #1

Name: N/A Radio # _____ Age: _____ Sex: _____

Hgt: _____ Wt: _____ Hair: _____ Eyes: _____ Glasses: _____ Facial Hair: _____

Clothing: _____

Vehicle: Make: _____ Model: _____ Year: _____ Color: _____

License #: _____

Comments/Other: _____

U/C AGENT #2

Name: N/A Radio # _____ Age: _____ Sex: _____

Hgt: _____ Wt: _____ Hair: _____ Eyes: _____ Glasses: _____ Facial Hair: _____

Clothing: _____

Vehicle: Make: _____ Model: _____ Year: _____ Color: _____

License #: _____

Comments/Other: _____

INFORMANT #1

Name/Number: N/A Present at Briefing: _____ Age: _____ Sex: _____

Hgt: _____ Wt: _____ Hair: _____ Eyes: _____ Glasses: _____ Facial Hair: _____

Clothing: _____

Vehicle: Make: _____ Model: _____ Year: _____ Color: _____

License #: _____

Comments/Other: _____

INFORMANT #2

Name/Number: N/A Present at Briefing: _____ Age: _____ Sex: _____

Hgt: _____ Wt: _____ Hair: _____ Eyes: _____ Glasses: _____ Facial Hair: _____

Clothing: _____

Vehicle: Make: _____ Model: _____ Year: _____ Color: _____

License #: _____

Comments/Other: _____

SUSPECT #1

Name: ALEXANDER SAULGIU Race: WHITE Age: 69 Sex: M

Hgt: 6-3 Wt: 200 Hair: GREY Eyes: BRO Facial Hair: BEARD

Unique Physical Characteristics: _____

CA DL # Y0743101
SSN # _____ 294983

Address: 1483 SHULG J RD City: LAFAYETTE

Clothing: _____

Weapon(s): UNKNOWN History of Violence: NO

Vehicle: Make: _____ Model: _____ Year: _____ Color: _____

License #: _____

Comments/Other: _____

SUSPECT #2

Name: UNKNOWN Race: _____ Age: _____ Sex: _____

Hgt: _____ Wt: _____ Hair: _____ Eyes: _____ Facial Hair: _____

Unique Physical Characteristics: _____

Address: _____ City: _____

Clothing: _____

Weapon(s): _____ History of Violence: _____

Vehicle: Make: _____ Model: _____ Year: _____ Color: _____

License#: _____

Comments/Other: _____

SUSPECT #3

Name: UNKNOWN Race: _____ Age: _____ Sex: _____

Hgt: _____ Wt: _____ Hair: _____ Eyes: _____ Facial Hair: _____

Unique Physical Characteristics: _____

Address: _____ City: _____

Clothing: _____

Weapon(s): _____ History of Violence: _____

Vehicle: Make: _____ Model: _____ Year: _____ Color: _____

License#: _____

Comments/Other: _____

COMMUNICATIONS

Primary Radio Channel: 4

Verbal Arrest Signal: N/A

Visual Arrest Signal: N/A

Emergency Signal: N/A

Time of Briefing: 8:00AM

Location of Briefing: PARKING LOT - PLEASANT HILL RD / HILLVIEW LN.

Municipal/County Jurisdiction: CONTRA COSTA COUNTY

Name of Watch Commander Notified: CO. CO. SHERIFF Time: _____

Name of Task Force Commander: (b)(7)(C),(b)(7)(F) Time: _____

Local Participation: YES

LABORATORY PROCESSING/CLEAN-UP

Chemist(s): (b)(7)(C),(b)(7)(F) - DEA SPECIAL TESTING LAB.

Chem Waste Management Notified: (b)(7)(C),(b)(7)(F) Time: 10/25/94 - 500P

Site Safety Officer: (b)(7)(C),(b)(7)(F)

Lab Truck: (b)(7)(C),(b)(7)(F)

Fire Dept. Notified: CO. CO. FIRE DEPT Time: (A) SCALG

Health Dept. Notified: CO. CO. HEALTH DEPT. Time: (A) SCALG

ASSIGNMENTS

	Name	Radio #	Assignment
1.	(b)(7)(C),(b)(7)(F)	(b)(7)(C),(b)(7)(F)	G/S
2.	(b)(7)(C),(b)(7)(F)	(b)(7)(C),(b)(7)(F)	VIDEO - ASSIST CHEM
3.	(b)(7)(C),(b)(7)(F)	(b)(7)(C),(b)(7)(F)	SITE SAFETY - LVL 'B'
4.	(b)(7)(C),(b)(7)(F)	(b)(7)(C),(b)(7)(F)	ASSIST CHEMIST
5.	(b)(7)(C),(b)(7)(F)	(b)(7)(C),(b)(7)(F)	LVL 'B'
6.	(b)(7)(C),(b)(7)(F)	(b)(7)(C),(b)(7)(F)	ASSIST CO. HEALTH
7.	(b)(7)(C),(b)(7)(F)	(b)(7)(C),(b)(7)(F)	DEA - CHEMIST
8.	(b)(7)(C),(b)(7)(F)	(b)(7)(C),(b)(7)(F)	

	Name	Radio #	Assignment
9.	(b)(7)(C),(b)(7)(F)	(b)(7)(C),(b)(7)(F)	
10.			
11.			
12.			
13.			
14.			
15.			
16.			
17.			
18.			
19.			

REPORT ASSIGNMENTS

Surveillance: _____ Arrest: _____

Evidence: _____ Search: (b)(7)(C),(b)(7)(F)

U/C: _____

Nearest Hospital: JOWH MUIR HOSPITAL

Address: 1601 YGNACIO VALLEY RD, LAWNT CRSEK Phone: 512-939-3000

AUSA Assigned: _____ Phone: _____

Operation Plan Approved:

_____ G/S

Diagrams/Maps Attached

ON 9/27/94, AGENTS FROM SFFD EXECUTED AN ADMINISTRATIVE INSPECTION WARRANT AT SHULGIUS RESIDENCE LOCATED AT 1483 SHULGIUS RD., LAFAYETTE, WHILE INSPECTING SHULGIUS LABORATORY, A CEMENT STRUCTURE LOCATED BEHIND THE MAIN RESIDENCE, AGENTS LOCATED A NUMBER OF CHEMICALS, APPARATUS AND CONTROLLED SUBSTANCES. ALL OF THESE MATERIALS SHOULD BE CONSIDERED HAZARDOUS. IN ADDITION THE CONFINED NATURE OF THE LABORATORY 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/AIR DETECTOR TO IDENTIFY POTENTIAL OXYGEN PROBLEMS IN AND AROUND THE LABORATORY. AN EMERGENCY EVACUATION TEAM OF AT LEAST TWO AGENTS WILL STAND BY IN LEVEL 'B' PROTECTION WHILE THE SITE INSPECTION IS IN PROGRESS. ONCE ALL POTENTIAL HAZARDS HAVE BEEN IDENTIFIED, THE LABORATORY WILL BE SECURED AND PROCESSED AS A CRIME SCENE AS PER DEA POLICY.

ATTEMPTS WILL BE MADE TO STABILIZE THE LABORATORY BEFORE ANY INDIVIDUALS ENTER THE LOCATION TO PROCESS THE SCENE. THESE EFFORTS MAY INCLUDE VENTILATION, STABILIZATION OF ONGOING CHEMICAL REACTIONS, ILLUMINATION, ETC. FIRE AND EMERGENCY MEDICAL ASSISTANCE WILL BE ON SCENE IN THE CASE OF EMERGENCY.

ONLY ESSENTIAL PERSONNEL WILL BE ALLOWED TO ENTER THE LABORATORY ONCE THE SCENE HAS BEEN SECURED. THOSE WHO ARE NEGOTIATING IN THE LABORATORY WILL BE INSTRUCTED SO BY THE

DETAIL

CONTRA COSTA CO

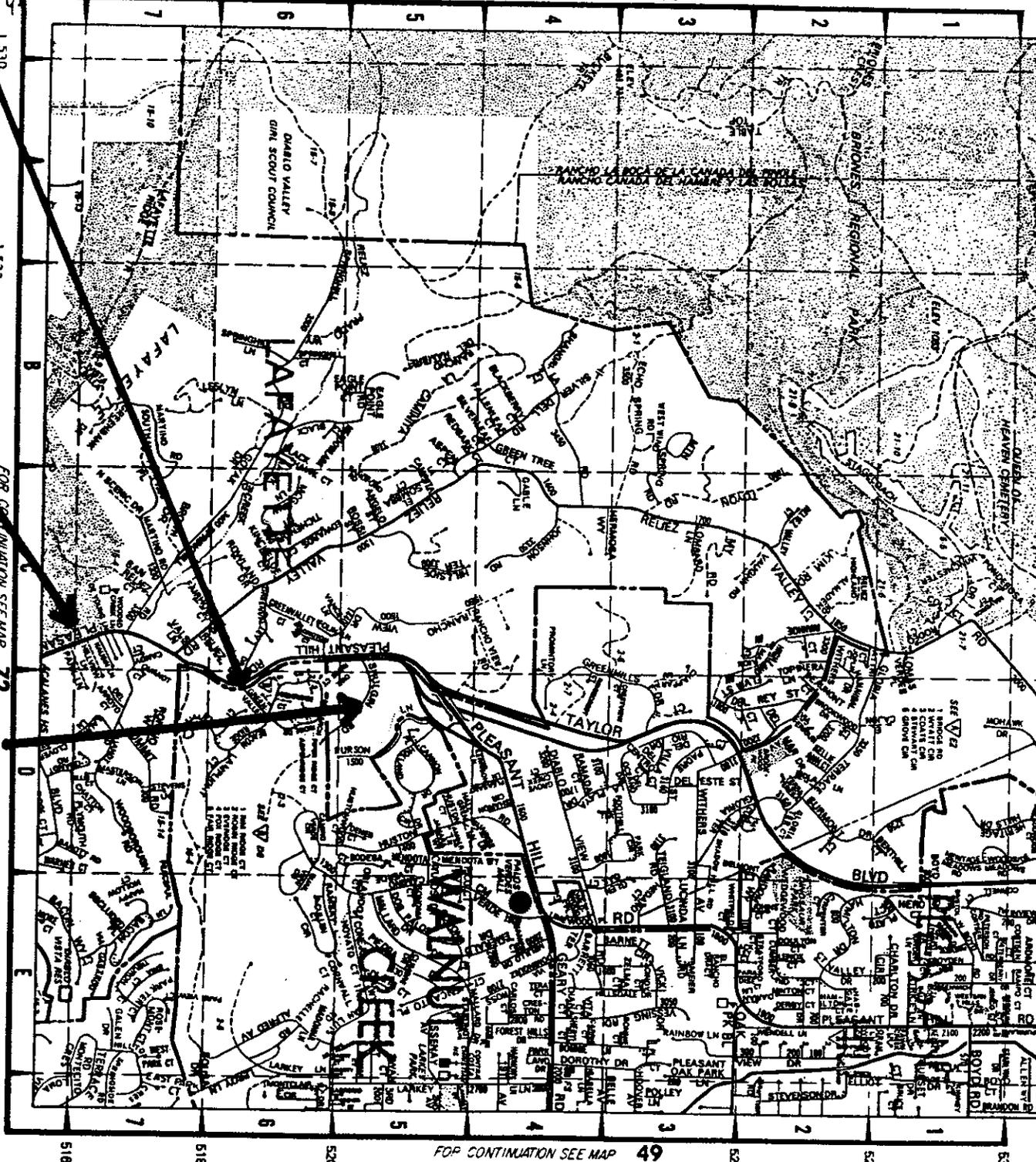
FOR CONTINUATION SEE MAP 45

46

FOR CONTINUATION SEE MAP 44

46

FOR CONTINUATION SEE MAP 49



STRAIGHT AREA

BRIENING LOCATIONS

FOR CONTINUATION SEE MAP 72
1483 SAUGHLIN RD.

1,545

1,530

1,533

FOR CONTINUATION SEE MAP 72

FOR CONTINUATION SEE MAP 44

1,545

516

518

520

526

528

530

530

530

COPYRIGHT © 1990 BY Thomas Dunham Maps

R3-95-0024

ORIGINAL FILED

SEP 26 1994

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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

UNITED STATES OF AMERICA
NORTHERN DISTRICT OF CALIFORNIA

IN THE MATTER OF THE)
ADMINISTRATIVE INSPECTION OF)
ALEXANDER T. SHULGIN)
ANALYTICAL LAB)
DEA REGISTRATION PS0061616)
1483 SHULGIN ROAD)
LAFAYETTE, CA 94549)

Magistrate's Docket No.
Case No. 3.94 30514
AFFIDAVIT FOR ADMINISTRATIVE
INSPECTION WARRANT

OEW

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

1 under Section 827, Title 21 of the United States Code and Section
2 1304.01 et seq., Title 21, Code of Federal Regulations.

3 Alexander Shulgin is registered under the provisions of the
4 Controlled Substances Act, Title 21, United States Code, Section
5 823 et seq., as an Analytical Laboratory and has been assigned
6 DEA registration number PS0061616 in Schedules I through V, and
7 is doing business at his residence, 1483 Shulgin Rd., Lafayette,
8 CA. That said place of business is a controlled premise within
9 the meaning of Section 880(a), Title 21 United States Code and
10 Section 1316.02(c), Title 21 Code of Federal Regulations.

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

16 The Affiant has examined the files and records of the Drug
17 Enforcement Administration and has learned that in 1970 Alexander
18 Shulgin applied for and was granted a DEA Analytical Laboratory
19 Registration to handle controlled substances at his residence,
20 1483 Shulgin Rd., Lafayette, CA, in Schedules I-V as is described
21 in 21 CFR 1301.22(b)(4) as follows:

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

AFFIDAVIT

-2-

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

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

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

22 In 1977 the DEA revoked Alexander Shulgin's DEA Schedule I
23 Researcher Registration based on the following. On February 8,
24 1977 the California Research Advisory Panel notified Dr. Shulgin
25 that it had withdrawn its approval of all Schedule I controlled
26 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

-3-

1 articles that he has authored) without obtaining an IND from the
2 Food and Drug Administration. See attached letter from
3 California Research Advisory Panel dated February 8, 1977
4 advising Dr. Alexander Shulgin of the Panel's decision to
5 withdraw his Schedule I Research Authority.

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

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

16 In February 1994, the Affiant reviewed the book PIHKAL
17 (Phenethylamines I Have Known and Loved), A Chemical Love Story,
18 Copyright 1991, Authored by Alexander Shulgin and his wife (b)(7)(C)
19 Phenethylamines are Hallucinogenic chemicals. An excerpt of the
20 book's foreword reads,

21 "For nearly thirty years one of the authors, Dr.
22 Alexander Shulgin, affectionately known to his friends
23 as Sasha, has been the only person in the world to
24 synthesize, then evaluate in himself, his wife (b)(7)(C) and
25 in a dedicated group of close friends, nearly 200
26 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

-4-

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

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

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

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

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

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

AFFIDAVIT

-5-

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

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

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

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

26 AFFIDAVIT

1 A return will be made to the Magistrate upon the completion
2 of the inspection.

3 The affiant further states that he has verified and has
4 knowledge of the facts alleged in this affidavit, and that they
5 are true to the best of his knowledge.

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

6
7
8 Drug Enforcement Administration

9 Sworn to before me and subscribed in my presence on this 26
10 day of Sept., 1994

11 Owen E. Woodruff
12 United States Magistrate

13
14
15
16
17
18
19
20
21
22
23
24
25
26 AFFIDAVIT

-7-

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

WAND P. O'BRIEN, J.D.
CHAIRMAN

VIG A. BERMAN, PH.D.
FRIEDE FASAL, M.D.
E. McDERMOTT, JR.
EDERICK MEYERS, M.D.
INFORD B. ROSSITER, M.D.

DOON J. DOW, PHARM.D.
EXECUTIVE SECRETARY



RESEARCH ADVISORY PANEL
6000 STATE BUILDING
SAN FRANCISCO, CALIFORNIA 94102

15) 557-1325

February 8, 1977

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

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

Dear Doctor Shulgin:

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

Moreover, in view of violation of the controlled substances act and failure to obtain Panel approval for recently completed non-marijuana Schedule I drug research, the 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

February 8, 1977

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 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 cannabinal will be needed, and that you have these substances on hand anyway. It is

February 8, 1977

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.

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

(b)(7)(C)

Pharm.D.

Executive Secretary

ALEXANDER AND ANN SHULGIN



SASHA AND ANN SHULGIN ENJOY THE CALIFORNIA SUN.

PSYCHEDELIC

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 psychological and spiritual potential. Most of Dr. Shulgin's psychoactive designer molecules are unknown to the public, but a few, such as 2CB

and DOM—better known as STP—have received wide-spread distribution. Additionally, he is largely, though indirectly, responsible for the widespread popularity of Ecstasy.

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

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

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.

INNOVATION

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.

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 threw it away to 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.*

SETTLEMENT AGREEMENT

Parties

This Agreement is entered into this 4th ^{Sunday, 1996} 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, IIIIN, 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 DEA administrative inspections.

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

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

**Shulgin Settlement
Agreement with U.S.**

2

ACCORDINGLY, in reliance upon the representations contained herein and in 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

shall physically surrender to DEA Diversion Investigator (b)(7)(C), (b)(7)(F) all controlled substances Shulgin has in 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 (b)(7)(C), (b)(7)(F) to come to his lab and he will explain and show Investigator (b)(7)(C), (b)(7)(F) how he disposed of any controlled substances which had been in his possession. Shulgin shall respond to all questions posed by Investigator (b)(7)(C), (b)(7)(F) about the disposition and circumstances of the disposition of said controlled substances and further provide Investigator (b)(7)(C), (b)(7)(F) access to all records with refer, reflect or relate to the destruction of said controlled substances.

4. Within five (5) calendar days of the effective date of this Agreement, (b)(7)(C), (b)(7)(F) Shulgin will have a cashier's check issued in the amount of \$25,000 (twenty-five *AS* thousand dollars) which will be made payable to the "Department of Justice" and hand delivered to AUSA Anne-Christine Massullo at the same address set forth in paragraph 1 no later than the day following the issuance of the check.

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)

Shulgin Settlement
Agreement with U.S.

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

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

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

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

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

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

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

25,000

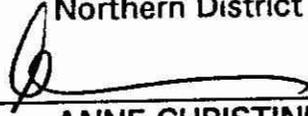
controlled substances thereafter and pay to the Department of Justice \$20,000 by cashier's check, all as more fully set forth in Paragraphs 1 to 4 above, Shulgin agrees to have the terms of the Agreement enforced against him in District Court and further agrees to pay reasonable costs and attorney's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

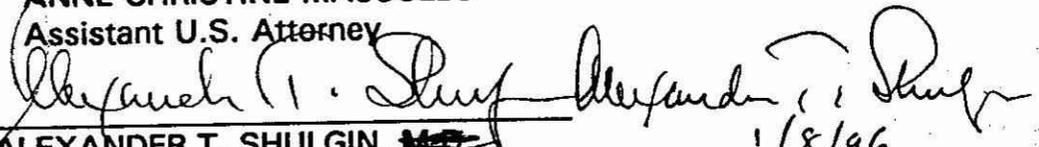
MICHAEL A. YAMAGUCHI
United States Attorney
Northern District of California

Dated: 12/13/95



ANNE-CHRISTINE MASSULLO
Assistant U.S. Attorney

Dated: 1/4/96



ALEXANDER T. SHULGIN, ~~ME~~

1/8/96

Dated: 1/4/96



Attorney for Alexander T. Shulgin

SEE REVERSE FOR
PRIVACY ACT
INFORMATION

**VOLUNTARY SURRENDER OF CONTROLLED
SUBSTANCES PRIVILEGES**

DEA USE ONLY

FILE NO.
REF. 93-2077

After being fully advised of my rights, and understanding that I am not required to surrender my controlled substances privileges, I freely execute this document and choose to take the actions described herein.

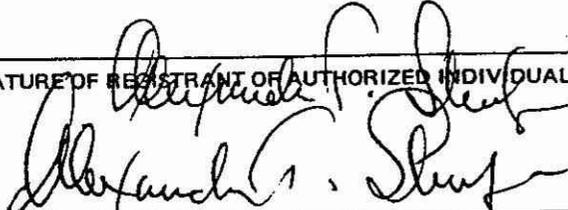
In view of my alleged failure to comply with the Federal requirements pertaining to controlled substances, and as an indication of my good faith in desiring to remedy any incorrect or unlawful practices on my part;

In view of my desire to terminate handling of controlled substances listed in schedule(s) _____;

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) Alexander T. Shulgin		ADDRESS OF REGISTRANT 1483 Shulgin Road Lafayette, CA 94549	
SIGNATURE OF REGISTRANT OR AUTHORIZED INDIVIDUAL 		DATE 1/8/96 1/5/96	DEA REGISTRATION NO. PS0061616

WITNESSES:

(b)(7)(C),(b)(7)(F)	TITLE DIVERSION INVESTIGATOR
	TITLE DIVERSION INVESTIGATOR



VOID AFTER 90 DAYS

11-35/1210

8025994579

Issuer: BankAmerica Corporation or
Bank of America NT&SA, San Francisco, California
IF THE AMOUNT OF THIS CHECK EXCEEDS \$10,000 IT IS DRAWN ON AND
ISSUED BY BANK OF AMERICA NT&SA AND IT IS A CASHIER'S CHECK.
8025994579 8-0523



Pay to the order of DEPARTMENT OF JUSTICE

OFFICIAL CHECK

ISSUED IN US DOLLARS
Payable at Bank of America NT&SA
San Francisco, California

PURCHASER:
ALEXANDER T SHUGIN
VOID OVER \$25,000.00

(b)(7)(C)

Two signatures required for amounts over \$500,000.

⑈8025994579⑈ ⑆121000358⑆ 13973⑈84013⑈

FX-2600v 12-83

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. R2-09-0174	2. G-DEP Identifier (b)(7)(E)
	3. File Title (b)(7)(C)	
4. Page 22 of 60	6. Date Prepared 09-08-2009	
5. Program Code		

(b)(7)(C)

77.

(b)(7)(C)

(b)(7)(C) Wikipedia records that Alexander SHULGIN, born on June 17, 1925, is a pharmacologist and drug developer who popularized MDMA in the 1970's and 1980's for psychopharmaceutical use in the treatment of depression and post-traumatic stress. In the 1970's, SHULGIN held pharmacology seminars for DEA agents, served DEA as an expert witness in court and received awards from DEA. However, in 1994, DEA raided SHULGIN's laboratory and recovered samples of Schedule I controlled substances anonymously sent to SHULGIN for testing. SHULGIN's Schedule I license was revoked and he was fined \$25,000. SHULGIN is also the author of a book called PiHKAL which is regarded by some as a cookbook for making illegal drugs.

78.

(b)(7)(C)

79.

I. GENERAL (Complete for all submissions)

1. Purpose of Submission <input type="checkbox"/> Informant Establishment <input checked="" type="checkbox"/> G-DEP Classification <input type="checkbox"/> Arrest <input type="checkbox"/> Fugitive Declaration		2. File / Informant No. R3-93-2077		3. Program Code	
4. File Title (b)(7)(C)		5. G-DEP Identifier (b)(7)(E)			
6. Group No. 10 - Diversion		7. Date Prepared November 10, 1994			
8. Name (Last, First, Middle) SHULGIN, Alexander, Theodore			9. Occupation Chemist, Author		
10. Address (No., Street, City, State/Country, Zip Code) 1483 Shulgin Road Lafayette, CA 9454			11. Employer Name and Address Self Employed		
12. Phone No. & Area Code (510) 934-1493	13. Date of Birth 06/17/25	14. Place of Birth (City, State/Country) Unknown	15. Citizenship (Country) U.S.	16. Ethnicity <input type="checkbox"/> Hispanic <input type="checkbox"/> Unknown <input checked="" type="checkbox"/> Non-Hispanic	
17. Race <input checked="" type="checkbox"/> White <input type="checkbox"/> Black <input type="checkbox"/> American Indian/Eskimo <input type="checkbox"/> Asian/Pacific Islander <input type="checkbox"/> Unknown			18. Alien <input type="checkbox"/> Legal / Alien Reg. No. <input type="checkbox"/> Illegal		
19. Sex <input checked="" type="checkbox"/> M <input type="checkbox"/> F	20. Height 6'3"	21. Weight 200lbs.	22. Eyes Blue	23. Hair Gray	24. Identifying Characteristics (scars, tatoos, etc.) Beard
25a. Driver's License No. Y0743101		25b. State/Country CA/USA	26a. Passport No. Unknown	26b. Issuing Country Unknown	26c. Expiration Date Unknown
27. NADDIS No. 294983, 1904492 ^{dup}		28. FBI No. None	29. Social Security No. Unknown	30. DEA Registration No. PS0061616	

31. Aliases / Other Names

II. INFORMANT ESTABLISHMENT (Complete as appropriate)

32. Category <input type="checkbox"/> Regular <input type="checkbox"/> Defendant <input type="checkbox"/> Restricted Use <input type="checkbox"/> Foreign Registry <input type="checkbox"/> For Payment Purposes Only				33. Initial Establishment <input type="checkbox"/> Reactivation <input type="checkbox"/>		34. CIS No.
--	--	--	--	--	--	-------------

III. G-DEP CLASSIFICATION (Complete for all G-DEP and Arrest Submissions)

35. Submission <input checked="" type="checkbox"/> Initial <input type="checkbox"/> Supplemental	36. Class of Violator (b)(7)(E)	37. G-DEP Drug Code Under Which Classified
---	------------------------------------	--

IV. ARREST (Complete for all Arrest Submissions)

38. Date of Arrest	39. PLACE OF ARREST					
	a. City		b. County		c. State / Country	
40a. Armed at Arrest <input type="checkbox"/> Yes <input type="checkbox"/> No	40b. If Armed (enter Number of Weapons by Type)				41a. Type of Violation (Possession, Sale, etc.)	
	TYPE	Handgun	Rifle	Shotgun	Lethal Cutting Instrument	Other Weapon
	Semi - Auto					
	Full Auto					
	Other					
	41b. Major Drug Violator was Charged With (Heroin, cocaine, etc.)					

V. FUGITIVE DECLARATION (Complete as appropriate)

42. Type <input type="checkbox"/> Prearrest <input type="checkbox"/> Post Arrest	43. NCIC No.	44. Apprehension Responsibility <input type="checkbox"/> DEA <input type="checkbox"/> USMS	45. DEA Contact Person (Name and Phone No. - include Area Code)
46. Warrant No.	47. Date / Place of Issue (City & State)		48. USMS Office Holding Warrant (City & State)

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

SYNOPSIS:

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

Quantitative Requirement: (b)(7)(E)

Drug Quantity Required: (b)(7)(E)

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

Handwritten notes and stamps: 58/11/94, 56/10/94, 56/9/94, 1818, 55. 8181, (b)(7)(C), (b)(7)(C), (b)(7)(C), DATE, INITIAL, SXT.

50. Agent's Name (Print or Type) (b)(7)(C),(b)(7)(F) Investigator		(b)(7)(C),(b)(7)(F)	52. Date 11/30/94
53. Supervisor's Name (Print or Type) (b)(7)(C),(b)(7)(F) Group Supervisor			55. Date 11/30/94
SAC APPROVAL (if appropriate)			
56. (b)(7)(C),(b)(7)(F)		57. Concurrence <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	58. Date 12/1/94

U.S. Department of Justice
Drug Enforcement Administration

REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

1. HOW OBTAINED (Check) Purchase Seizure Free Sample
 Lab. Seizure Money Flashed Compliance Sample (Non-Criminal)
 Other (Specify Surrendered)

2a. FILE NO. 83-93-2077

2b. PROGRAM CODE (b)(7)(E)

3. G-DEP ID

4a. WHERE OBTAINED (City, State/Country) Lafayette, GA

4b. DATE OBTAINED October 31, 1994

5. FILE TITLE (b)(7)(C)

6a. REFERRING AGENCY (Name)

6b. REFERRAL (b)(7)(C)

Case No. OR Seizure No.

7. DATE PREPARED November 1, 1994

8. GROUP NO. 10 - Diversion

9. Exhibit No.	10. FDIN (8 characters)	11. ALLEGED DRUGS	12. MARKS OR LABELS (Describe fully)	APPROX. GROSS QUANTITY		15. Purchase Cost
				13. Seized	14. Submitted	
46		Unknown	Tan vegetable matter contained in a box #22231	62.8g.gwt.	62.8g.gwt.	0.00
47		Unknown	Tan powder contained in a plastic jar #22206	31.7g.gwt.	31.7g.gwt.	0.00

16. WAS ORIGINAL CONTAINER SUBMITTED SEPARATE FROM DRUG? NO (Included above) YES (If Yes, enter exhibit no. and describe original container fully)

REMARKS:
 On 10/31/94 the above exhibits were surrendered by Dr. SHULGIN at his residence to D/I (b)(7)(C), (b)(7)(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), (b)(7)(F) on 11/03/94.

17. SUBMITTED BY SPECIAL AGENT (Signature) (b)(7)(C), (b)(7)(F) Investigator

18. APPROVED BY (Signature & Title) (b)(7)(C), (b)(7)(F) Group Supervisor

LABORATORY EVIDENCE RECEIPT REPORT

19. No. PACKAGES 2

20. RECEIVED FROM (Signature & Date) AM 602 969 539 11/7/94

21. TITLE LET

22. SEAL Broken Unbroken

24. TITLE

LABORATORY ANALYSIS/COMPARISON REPORT

25. ANALYSIS SUMMARY AND REMARKS

Lab #	Exhibit	Gross WT	Net WT	Gross WT after analysis
A1864	46	62.4 gm	5.4706 gm	62.5 gm
A1865	47	31.7 gm	Traces	31.6 gm

26. Exhibit No.	27. Lab. No.	28. ACTIVE DRUG INGREDIENT (Established or Common Name)	WEIGHT PER UNIT ANALYZED			32. TOTAL NET	33. RESERVE
			29. Strength	30. Measure	31. Unit		
46	A1864	Psilocin and Psilocybin				5.1453 gm	
47A	A1865	d-methamphetamine (Salt Form Not Determined)					Consummed
47B		l-methamphetamine (Salt Form Not Determined)					Consummed

34. ANALYST (Signature) (b)(7)(C)

35. TITLE Forensic Chemist

36. DATE COMPLETED 01/27/95

37. APPROVED BY (b)(7)(C)

38. TITLE Laboratory Director

39. LAB. LOCATION McLean, VA

U.S. Department of Justice
Drug Enforcement Administration

REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

1. HOW OBTAINED (Check) Purchase Seizure Free Sample
 Lab. Seizure Money Flashed Compliance Sample (Non-Criminal)
 Other (Specify) _____

2a. FILE NO. R3-93-2077

2b. PROGRAM CODE

3. G-DEP ID (b)(7)(E)

4a. WHERE OBTAINED (City, State/Country) Surrendered Lafayette, CA

4b. DATE OBTAINED October 31, 1994

5. FILE TITLE (b)(7)(C)

6a. REFERRING AGENCY (Name)

6b. REFERRAL No. Case No. OR Seizure No.

7. DATE PREPARED November 1, 1994

8. GROUP NO. 10 Diversion

9. Exhibit No.	10. FDIN (8 characters)	11. ALLEGED DRUGS	12. MARKS OR LABELS (Describe fully)	APPROX. GROSS QUANTITY		15. Purchase Cost
				13. Seized	14. Submitted	
44		Unknown	Unknown tablet in tin foil further contained in a glass vial #22204	28.0g.gwt.	28.0g.gwt.	0.0
45		Unknown	Tan powder contained in a glass vial #22221			0.0

16. WAS ORIGINAL CONTAINER SUBMITTED SEPARATE FROM DRUG? NO (Included above) YES (If Yes, enter exhibit no. and describe original container fully)

REMARKS:
 On 10/31/94 the above exhibits were surrendered by Dr. SHULGIN at his residence to D/I (b)(7)(C),(b)(7)(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),(b)(7)(F) on 11/03/94.

17. SUBMITTED BY SPECIAL AGENT (Signature) (b)(7)(C),(b)(7)(F) Investigator

18. APPROVED BY (Signature & Title) (b)(7)(C),(b)(7)(F) Group Supervisor

LABORATORY EVIDENCE RECEIPT REPORT

19. No. PACKAGES 2

20. RECEIVED FROM (Signature & Date) PA 602 964 539 11/7/94

21. TITLE

22. SEAL Broken Unbroken

23. (b)(7)(C)

24. TITLE ET

LABORATORY ANALYSIS/COMPARISON REPORT

25. ANALYSIS SUMMARY AND REMARKS

Lab #	Exhibit	Gross WT	Net WT	Gross WT after Analysis
A1862	44	28.0 gm	1 tablet (0.4025 gm)	28.2 gm
A1863	45	28.7 gm	0.0368 gm	28.7 gm

26. Exhibit No.	27. Lab. No.	28. ACTIVE DRUG INGREDIENT (Established or Common Name)	WEIGHT PER UNIT ANALYZED			32. TOTAL NET	33. RESERVE
			29. Strength	30. Measure	31. Unit		
44	A1862	3,4-Methylenedioxyamphetamine HCl 3,4-Methylenedioxymethamphetamine HCl and Methorphan HCl					0.3071 gm
45	A1863	3,4-Methylenedioxymethamphetamine HCl and 3,4-Methylenedioxyethylamphetamine HCl					0.0250 gm

34. ANALYST (Signature) (b)(7)(C)

35. TITLE Forensic Chemist

36. DATE COMPLETED 01/27/95

37. APPROVED BY (b)(7)(C)

38. TITLE Laboratory Director

39. LAB. LOCATION Richmond, VA

U.S. Department of Justice
Drug Enforcement Administration

REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

1. HOW OBTAINED (Check) Purchase Seizure Free Sample
 Lab. Seizure Money Flashed Compliance Sample (Non-Criminal)
 Other (Specify Surrendered)

2a. FILE NO. R3-93-2077

2b. PROGRAM CODE

3. G-DEP ID (b)(7)(E)

4a. WHERE OBTAINED (City, State/Country) Lafayette, CA

4b. DATE OBTAINED October 31, 1994

5. FILE TITLE (b)(7)(C)

6a. REFERRING AGENCY (Name)

6b. REFERRAL Case No. OR Seizure No. No. 10 - Diversion

7. DATE PREPARED November 1, 1994

8. GROUP NO.

9. Exhibit No.	10. FDIN (8 characters)	11. ALLEGED DRUGS	12. MARKS OR LABELS (Describe fully)	APPROX. GROSS QUANTITY		15. Purchase Cost
				13. Seized	14. Submitted	
41		Unknown	Yellow & red tablets contained in a glass vial #22201	29.6g.gwt.	29.6g.gwt.	0.
42		Unknown	4 white tablets contained in a glass vial #22203	34.8g.gwt.	34.8g.gwt.	0.
43		Unknown	8 white tablets contained in a glass vial #22202	43.2g.gwt.	43.2g.gwt.	0.

16. WAS ORIGINAL CONTAINER SUBMITTED SEPARATE FROM DRUG? NO (Included above) YES (If Yes, enter exhibit no. and describe original container fully)

REMARKS:
 On 10/31/94 the above exhibits were surrendered by Dr. SHULGIN at his residence to D/I (b)(7)(C),(b)(7)(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),(b)(7)(F) on 11/03/94.

17. SUBMITTED BY SPECIAL AGENT (Signature) (b)(7)(C),(b)(7)(F) Investigator

18. APPROVED BY (Signature & Title) (b)(7)(C),(b)(7)(F) Group Supervisor

LABORATORY EVIDENCE RECEIPT REPORT

19. No. PACKAGES 3

20. RECEIVED FROM (Signature & Date) (b)(7)(C) 9/24/94 5:39 11/7/94

21. TITLE

22. SEAL Broken Unbroken

24. TITLE

LABORATORY ANALYSIS/COMPARISON REPORT

25. ANALYSIS SUMMARY AND REMARKS

Lab #	Exhibit	Gross WT	Net WT	Gross WT after Analysis
A1859	41	29.5 gm	A 7 tablets (0.7536 gm) B 3 tablets (0.2300 gm)	29.5 gm
A1860	42	34.8 gm	4 tablets (1.5067 gm)	34.6 gm
A1861	43	43.5 gm	8 tablets (3.2250 gm)	43.2 gm

26. Exhibit No.	27. Lab. No.	28. ACTIVE DRUG INGREDIENT (Established or Common Name)	WEIGHT PER UNIT ANALYZED			32. TOTAL NET	33. RESERVE
			29. Strength	30. Measure	31. Unit		
41	A1859	A Phencyclidine HCl					0.6401 gm
		B Phencyclidine HCl					0.1577 gm
42	A1860	Methorphan HCl and Ephedrine HCl					1.3388 gm
43	A1861	Methorphan HCl and Ephedrine HCl					3.0551 gm

34. ANALYST (Signature) (b)(7)(C)

35. TITLE Forensic Chemist

36. DATE COMPLETED 01/27/95

37. APPROVED BY (b)(7)(C)

38. TITLE Laboratory Director

39. LAB. LOCATION McLean, VA

U.S. Department of Justice
Drug Enforcement Administration

REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

1. HOW OBTAINED (Check) Purchase Seizure Free Sample
 Lab. Seizure Money Flashed Compliance Sample (Non-Criminal)
 Other (Specify) Surrendered

2a. FILE NO. 83-93-2077

2b. PROGRAM CODE

3. G-DEP ID (b)(7)(E)

4a. WHERE OBTAINED (City, State/Country) Lafayette, CA

4b. DATE OBTAINED October 31, 1994

5. FILE TITLE (b)(7)(C)

6a. REFERRING AGENCY (Name)

6b. REFERRAL Case No. OR Seizure No.

7. DATE PREPARED November 1, 1994

8. GROUP NO. 10 - Diversion

9. Exhibit No.	10. FDIN (8 characters)	11. ALLEGED DRUGS	12. MARKS OR LABELS (Describe fully)	APPROX. GROSS QUANTITY		15. Purchase Cost
				13. Seized	14. Submitted	
38		Unknown	Tan powder contained in a glass vial #22225	28.8g.gwt.	28.8g.gwt.	0.00
39		Unknown	Tan powder contained in a glass vial #22205	28.8g.gwt.	28.8g.gwt.	0.00
40		Unknown	White powder contained in a glass vial #22217	28.8g.gwt.	28.8g.gwt.	0.00

16. WAS ORIGINAL CONTAINER SUBMITTED SEPARATE FROM DRUG? NO (Included above) YES (If Yes, enter exhibit no. and describe original container fully)

REMARKS:
 On 10/31/94 the above exhibits were surrendered by Dr. SMULCTN at his residence to D/I (b)(7)(C),(b)(7)(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),(b)(7)(F) on 11/03/94.

17. SUBMITTED BY SPECIAL AGENT (Signature) (b)(7)(C),(b)(7)(F) Investigator

18. APPROVED BY (Signature & Title) (b)(7)(C),(b)(7)(F) Group Supervisor

LABORATORY EVIDENCE RECEIPT REPORT

19. No. PACKAGES 3

20. RECEIVED FROM (Signature & Date) RM 612 964 539 11/7/94

21. TITLE

22. SEAL Broken Unbroken

24. TITLE ET

LABORATORY ANALYSIS/COMPARISON REPORT

25. ANALYSIS SUMMARY AND REMARKS

Lab #	Exhibit	Gross WT	Net WT	Gross WT after Analysis
A1856	38	28.7 gm	0.0125 gm	28.7 gm
A1857	39	28.7 gm	0.1081 gm	28.7 gm
A1858	40	28.6 gm	0.2392 gm	28.7 gm

26. Exhibit No.	27. Lab. No.	28. ACTIVE DRUG INGREDIENT (Established or Common Name)	WEIGHT PER UNIT ANALYZED			32. TOTAL NET	33. RESERVE
			29. Strength	30. Measure	31. Unit		
38	A1856	3,4-Methylenedioxyamphetamine phosphate				0.0044 gm	
39	A1857	3,4-Methylenedioxyamphetamine phosphate				0.0918 gm	
40	A1858	3,4-Methylenedioxyamphetamine sulfate				0.2322 gm	

34. ANALYST (Signature) (b)(7)(C)

35. TITLE Forensic Chemist

36. DATE COMPLETED 01/20/95

38. TITLE Laboratory Director

39. LAB. LOCATION McLean, VA

U.S. Department of Justice
Drug Enforcement Administration

REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

1. HOW OBTAINED (Check) Purchase Seizure Free Sample
 Lab. Seizure Money Flashed Compliance Sample (Non-Criminal)
 Other (Specify) Surrendered

2a. FILE NO. R3-93-2077

2b. PROGRAM CODE

3. G-DEP ID (b)(7)(E)

4a. WHERE OBTAINED (City, State/Country) Lafayette, CA

4b. DATE OBTAINED October 21, 1994

5. FILE TITLE (b)(7)(C)

6a. REFERRING AGENCY (Name)

6b. REFERRAL No. November 1, 1994 OR Seizure No. 10 - Division

GROUP NO.

9. Exhibit No.	10. FDIN (8 characters)	11. ALLEGED DRUGS	12. MARKS OR LABELS (Describe fully)	APPROX. GROSS QUANTITY		15. Purchase Cost
				13. Seized	14. Submitted	
35		Unknown	White powder contained in glass vial #22222	28.7g.gwt.	28.7g.gwt.	0.0
36		Unknown	White crystals contained in a glass vial #22218	28.6g.gwt.	28.6g.gwt.	0.0
37		Unknown	White crystals contained in a glass vial #22227	28.7g.gwt.	28.7g.gwt.	0.0

16. WAS ORIGINAL CONTAINER SUBMITTED SEPARATE FROM DRUG? NO (Included above) YES (If Yes, enter exhibit no. and describe original container fully)

REMARKS:

On 10/31/94 the above exhibits were surrendered by Dr. SHULGIN at his residence to D/I (b)(7)(C),(b)(7)(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),(b)(7)(F) on 11/03/94.

17. SUBMITTED BY SPECIAL AGENT (Signature) (b)(7)(C),(b)(7)(F) Investigator

18. APPROVED BY (Signature & Title) (b)(7)(C),(b)(7)(F) Group Supervisor

LABORATORY EVIDENCE RECEIPT REPORT

19. No. PACKAGES 3

20. RECEIVED FROM (Signature & Date) RUILOOZ 964-539 11/7/94

21. TITLE

22. SEAL Broken Unbroken

24. TITLE ET

LABORATORY ANALYSIS/COMPARISON REPORT

25. ANALYSIS SUMMARY AND REMARKS

Lab #	Exhibit	Gross WT	Net WT	Gross WT after Analysis
A1853	35	28.7 gm	0.0369 gm	28.7 gm
A1854	36	28.6 gm	0.0500 gm	28.6 gm
A1855	37	28.6 gm	0.1071 gm	28.6 gm

26. Exhibit No.	27. Lab. No.	28. ACTIVE DRUG INGREDIENT (Established or Common Name)	WEIGHT PER UNIT ANALYZED			32. TOTAL NET	33. RESERVE
			29. Strength	30. Measure	31. Unit		
35	A1853	3,4-Methylenedioxymethamphetamine HCl				0.0315 gm	
36	A1854	Mescaline HCl				0.0356 gm	
37	A1855	Mescaline HCl				0.1013 gm	

34. ANALYST (Signature) (b)(7)(C)

35. TITLE Forensic Chemist

36. DATE COMPLETED 01/20/95

37. APPROVED BY (b)(7)(C)

38. TITLE Laboratory Director

39. LAB. LOCATION McLean, VA

U.S. Department of Justice
Drug Enforcement Administration

REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

1. HOW OBTAINED (Check) Purchase Seizure Free Sample
 Lab. Seizure Money Flashed Compliance Sample (Non-Criminal)
 Other (Specify)

2a. FILE NO. 23-93-2077

2b. PROGRAM CODE

3. G-DEP ID (b)(7)(E)

4a. WHERE OBTAINED (City, State/Country) Lafayette, CA

4b. DATE OBTAINED October 31, 1994

5. FILE TITLE (b)(7)(C)

6a. REFERRING AGENCY (Name)

6b. REFERRAL No. Case No. OR Seizure No. GROUP NO.

9. Exhibit No.	10. FDIN (8 characters)	11. ALLEGED DRUGS	12. MARKS OR LABELS (Describe fully)	APPROX. GROSS QUANTITY		15. Purchase Cost
				13. Seized	14. Submitted	
32		Unknown	White powder contained in a glass vial #22224	28.6g gwt	28.6g gwt	0.
33		Unknown	White crystalline powder in a glass vial #22229	28.5g gwt	28.5g gwt	0.
34		Unknown	White powderline powder in a glass vial #22215	28.8g gwt	28.8g gwt	0.

16. WAS ORIGINAL CONTAINER SUBMITTED SEPARATE FROM DRUG? NO (Included above) YES (If Yes, enter exhibit no. and describe original container fully)

REMARKS:
 On 10/31/94 the above exhibits were surrendered by Dr. SHULGIN at his residence to D/I (b)(7)(C),(b)(7)(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),(b)(7)(F) on 11/03/94.

17. SUBMITTED BY SPECIAL AGENT (Signature) (b)(7)(C),(b)(7)(F) Investigator

18. APPROVED BY (Signature & Title) (b)(7)(C),(b)(7)(F) Group Supervisor

19. No. PACKAGES 3

20. RECEIVED FROM (Signature & Date) (b)(7)(C) 11/7/94

21. TITLE LABORATORY EVIDENCE

22. SEAL Broken Unbroken

24. TITLE ET

25. ANALYSIS SUMMARY AND REMARKS

Lab #	Exhibit	Gross WT	Net WT	Gross WT after Analysis
A1850	32	28.4 gm	0.0991 gm	28.8 gm
A1851	33	28.6 gm	0.1479 gm	28.8 gm
A1852	34	28.7 gm	0.1091 gm	28.8 gm

26. Exhibit No.	27. Lab. No.	28. ACTIVE DRUG INGREDIENT (Established or Common Name)	WEIGHT PER UNIT ANALYZED			32. TOTAL NET	33. RESERVE
			29. Strength	30. Measure	31. Unit		
32	A1850	3,4-Methylenedioxymethamphetamine HCl				0.0910 g	
33	A1851	Mescaline HCl				0.1300 g	
34	A1852	Mescaline Sulfate				0.0970 g	

34. ANALYST (Signature) (b)(7)(C)

35. TITLE Forensic Chemist

36. DATE COMPLETED 01/17/95

37. (b)(7)(C)

38. TITLE Laboratory Director

39. LAB. LOCATION McLean, VA

U.S. Department of Justice
Drug Enforcement Administration

REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

1. HOW OBTAINED (Check) Purchase Seizure Free Sample
 Lab. Seizure Money Flashed Compliance Sample (Non-Criminal)
 Other (Specify) _____

2a. FILE NO. **R3-93-2077**

2b. PROGRAM CODE _____

3. G-DEP ID **(b)(7)(E)**

4a. WHERE OBTAINED (City, State/Country) **Surrendered Lafayette, CA**

4b. DATE OBTAINED **October 31, 1994**

5. FILE TITLE **(b)(7)(C)**

6a. REFERRING AGENCY (Name) _____

6b. REFERRAL No. Case No. OR Seizure No. _____

7. GROUP NO. **10 - Diversion**

9. Exhibit No.	10. FDIN (8 characters)	11. ALLEGED DRUGS	12. MARKS OR LABELS (Describe fully)	APPROX. GROSS QUANTITY		15. Purchase Cost
				13. Seized	14. Submitted	
29		Unknown	Pink powder contained in a glass vial #22208	29.0g gwt	29.0g gwt	0.0
30		Unknown	Tan powder contained in a glass vial #22230	28.5g gwt	28.5g gwt	0.0
31		Unknown	White powder contained in a glass vial #22223	28.3g gwt	28.3g gwt	0.0

16. WAS ORIGINAL CONTAINER SUBMITTED SEPARATE FROM DRUG? NO (Included above) YES (If Yes, enter exhibit no. and describe original container fully)

REMARKS:
 On 10/31/94 the above exhibits were surrendered by Dr. SHULGIN at his residence to D/I **(b)(7)(C),(b)(7)(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),(b)(7)(F)** on 11/03/94.

17. SUBMITTED BY SPECIAL AGENT (Signature) **(b)(7)(C),(b)(7)(F)** Investigator

18. APPROVED BY (Signature & Title) **(b)(7)(C),(b)(7)(F)** Group Supervisor

LABORATORY EVIDENCE RECEIPT REPORT

19. No. PACKAGES **3**

20. RECEIVED FROM (Signature & Date) **Ru 602 964 539 11/7/94**

21. TITLE _____

22. SEAL Broken Unbroken

24. TITLE **ET**

LABORATORY ANALYSIS/COMPARISON REPORT

25. ANALYSIS SUMMARY AND REMARKS

Lab #	Exhibit	Gross WT	Net WT	Gross WT after Analysis
A1847	29	29.0 gm	0.0071 gm	29.0 gm
A1848	30	28.5 gm	0.0412 gm	28.5 gm
A1849	31	28.3 gm	0.0183 gm	28.3 gm

26. Exhibit No.	27. Lab. No.	28. ACTIVE DRUG INGREDIENT (Established or Common Name)	WEIGHT PER UNIT ANALYZED			32. TOTAL NET	33. RESERVE
			29. Strength	30. Measure	31. Unit		
29	A1847	No controlled substances detected					0.0014 gm
30	A1848	Trans-isoapiol					0.0020 gm
31	A1849	2,5-Dimethoxy-4-bromophenethylamine HCl					0.0135 gm

34. ANALYST (Signature) **(b)(7)(C)**

35. TITLE **Forensic Chemist**

36. DATE COMPLETED **01/20/95**

37. _____

38. TITLE **Laboratory Director**

39. LAB. LOCATION **McLean, VA**

U.S. Department of Justice
Drug Enforcement Administration

REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

1. HOW OBTAINED (Check) Purchase Seizure Free Sample
 Lab. Seizure Money Flashed Compliance Sample (Non-Criminal)
 Other (Specify) Surrendered

2a. FILE NO. R3-93-2077

2b. PROGRAM CODE

3. G-DEP ID (b)(7)(E)

4a. WHERE OBTAINED (City, State/Country) Lafayette, CA

4b. DATE OBTAINED October 31, 1994

5. FILE TITLE (b)(7)(C)

6a. REFERRING AGENCY (Name)

6b. REFERRAL Case No. OR Seizure No. No.

7. DATE PREPARED November 1, 1994

8. GROUP NO. 10 - Diversion

9. Exhibit No.	10. FDIN (8 characters)	11. ALLEGED DRUGS	12. MARKS OR LABELS (Describe fully)	APPROX. GROSS QUANTITY		15. Purchase Cost
				13. Seized	14. Submitted	
26		Unknown	White powder contained in a glass vial #22213	28.7g.gwt.	28.7g.gwt.	0.0
27		Unknown	White powder contained in a glass vial #22210	29.1g.gwt.	29.1g.gwt.	0.0
28		Unknown	Tan powder contained in a glass vial #22220	29.2g.gwt.	29.2g.gwt.	0.0

16. WAS ORIGINAL CONTAINER SUBMITTED SEPARATE FROM DRUG? NO (Included above) YES (If Yes, enter exhibit no. and describe original container fully)

REMARKS:
 On 10/31/94 the above exhibits were surrendered by Dr. SHULGIN at his residence to D/I (b)(7)(C), (b)(7)(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), (b)(7)(F) on 11/03/94.

17. SUBMITTED BY SPECIAL AGENT (Signature) (b)(7)(C), (b)(7)(F) Investigator

18. APPROVED BY (Signature & Title) (b)(7)(C), (b)(7)(F) Group Supervisor

LABORATORY EVIDENCE RECEIPT REPORT

19. No. PACKAGES 3

20. RECEIVED FROM (Signature & Date) DET. [Signature] 11/7/94

21. TITLE

22. SEAL Broken Unbroken

24. TITLE

LABORATORY ANALYSIS/COMPARISON REPORT

25. ANALYSIS SUMMARY AND REMARKS

Lab #	Exhibit	Gross WT	Net WT	Gross WT after Analysis
A1844	26	29.41 gm	0.0448 gm	29.4 gm
A1845	27	29.33 gm	0.0290 gm	29.4 gm
A1846	28	29.65 gm	0.1051 gm	29.3 gm

26. Exhibit No.	27. Lab. No.	28. ACTIVE DRUG INGREDIENT (Established or Common Name)	WEIGHT PER UNIT ANALYZED			32. TOTAL NET	33. RESERVE
			29. Strength	30. Measure	31. Unit		
A1844	26	Mescaline Sulfate					0.0338 g
A1845	27	2,5-Dimethoxy-4-bromophenethylamine HCl					0.0186 g
A1846	28	3,4-Methylenedioxy-methamphetamine HCl					0.0966 g

34. ANALYST (Signature) (b)(7)(C)

35. TITLE Forensic Chemist

36. DATE COMPLETED 01/12/95

38. TITLE Laboratory Director

39. LAB. LOCATION NoLean, VA

U.S. Department of Justice
Drug Enforcement Administration

REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

1. HOW OBTAINED (Check) Purchase Seizure Free Sample
 Lab. Seizure Money Flashed Compliance Sample (Non-Criminal)
 Other (Specify Surrendered)

2a. FILE NO. R3-93-2077

2b. PROGRAM CODE

3. G-DEP ID (b)(7)(E)

4a. WHERE OBTAINED (City, State/Country) Lafayette, CA

4b. DATE OBTAINED October 31, 1994

5. FILE TITLE (b)(7)(C)

6a. REFERRING AGENCY (Name)

6b. REFERRAL Case No. OR Seizure No. No.

7. DATE PREPARED November 1, 1994

8. GROUP NO. 10 - Diversion

9. Exhibit No.	10. FDIN (8 characters)	11. ALLEGED DRUGS	12. MARKS OR LABELS (Describe fully)	APPROX. GROSS QUANTITY		15. Purchase Cost
				13. Seized	14. Submitted	
23		Unknown	Tan powder contained in a glass vial #22228	29.3g.gwt.	29.3g.gwt.	0.0
24		Unknown	Brown liquid contained in glass vial #22211	29.1g.gwt.	29.1g.gwt.	0.0
25		Unknown	White powder contained in	29.3g.gwt.	29.3g.gwt.	0.0

16. WAS ORIGINAL CONTAINER SUBMITTED SEPARATE FROM DRUG? NO (Included above) YES (If Yes, enter exhibit no. and describe original container fully)

REMARKS:
 On 10/31/94 the above exhibits were surrendered by Dr. SHULGIN at his residence to D/I (b)(7)(C), (b)(7)(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), (b)(7)(F) on 11/03/94.

17. SUBMITTED BY SPECIAL AGENT (Signature) (b)(7)(C), (b)(7)(F) Investigator

18. APPROVED BY (Signature & Title) (b)(7)(C), (b)(7)(F) Group Supervisor

LABORATORY EVIDENCE RECEIPT REPORT

19. No. PACKAGES 3

20. RECEIVED FROM (Signature & Date) RM 602 964 539 11/17/94

21. TITLE

22. SEAL Broken Unbroken

24. TITLE

SIS/COMPARISON REPORT

25. ANALYSIS SUMMARY AND REMARKS

Lab #	Exhibit	Gross WT	Net WT	Gross WT after Analysis
A1841	23	29.47 gm	0.3807 gm	29.5 gm
A1842	24	29.17 gm	0.004 gm (estimated)	29.3 gm
A1843	25	29.58 gm	0.4278 gm	29.5 gm

26. Exhibit No.	27. Lab. No.	28. ACTIVE DRUG INGREDIENT (Established or Common Name)	WEIGHT PER UNIT ANALYZED			32. TOTAL NET	33. RESERVE
			29. Strength	30. Measure	31. Unit		
23	A1841	Mescaline HCl				0.3791 gm	
24	A1842	2,5-Dimethoxy-4-bromophenethylamine			(Salt form not determined)	0.002 (es)	
25	A1843	3,4-Methylenedioxymethamphetamine HCl				0.4171 gm	

34. ANALYST (Signature) (b)(7)(C)

35. TITLE Forensic Chemist

36. DATE COMPLETED 01/12/95

38. TITLE Laboratory Director

39. LAB. LOCATION McLean, Virginia

U.S. Department of Justice
Drug Enforcement Administration

REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

1. HOW OBTAINED (Check) Purchase Seizure Free Sample
 Lab. Seizure Money Flashed Compliance Sample (Non-Criminal)
 Other (Specify Surrendered)

2a. FILE NO. R3-93-2077

2b. PROGRAM CODE

3. G-DEP ID (b)(7)(E)

4a. WHERE OBTAINED (City, State/Country) Lafayette, CA

4b. DATE OBTAINED October 31, 1994

5. FILE TITLE (b)(7)(C)

6a. REFERRING AGENCY (Name)

6b. REFERRAL Case No. OR Seizure No. No.

7. DATE PREPARED November 1, 1994

8. GROUP NO. 10 - Diversion

9. Exhibit No.	10. FDIN (8 characters)	11. ALLEGED DRUGS	12. MARKS OR LABELS (Describe fully)	APPROX. GROSS QUANTITY		15. Purchase Cost
				13. Seized	14. Submitted	
20		Unknown	White powder contained in glass vial #22214	28.7g.gwt.	28.7g.gwt.	0.
21		Unknown	Tan powder contained in a glass vial #22218	29.0g.gwt.	29.0g.gwt.	0.
22		Unknown	Tan powder contained in a glass vial #DEBBIE J	29.2g.gwt.	29.2g.gwt.	0.

16. WAS ORIGINAL CONTAINER SUBMITTED SEPARATE FROM DRUG? NO (Included above) YES (If Yes, enter exhibit no. and describe original container fully)

REMARKS:
 On 10/31/94 the above exhibits were surrendered by Dr. SHULGIN at his residence to D/I (b)(7)(C),(b)(7)(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),(b)(7)(F) on 11/03/94.

17. SUBMITTED BY SPECIAL AGENT (Signature) (b)(7)(C),(b)(7)(F) Investigator

18. APPROVED BY (Signature & Title) (b)(7)(C),(b)(7)(F) Group Supervisor

LABORATORY EVIDENCE RECEIPT REPORT

19. No. PACKAGES 3

20. RECEIVED FROM (Signature & Date) P.M.L. 02 964 539 11/7/94

21. TITLE

22. SEAL Broken Unbroken

23. (b)(7)(C) re & Date) ET

24. TITLE

LABORATORY ANALYSIS/COMPARISON REPORT

25. ANALYSIS SUMMARY AND REMARKS

Lab #	Exhibit	Gross WT	Net WT	Gross WT after Analysis
A1838	20	30.44 gm	0.1406 gm	30.75 gm
A1839	21	29.21 gm	0.0414 gm	31.18 gm
A1840	22	30.17 gm	0.0020 gm	30.02 gm

26. Exhibit No.	27. Lab. No.	28. ACTIVE DRUG INGREDIENT (Established or Common Name)	WEIGHT PER UNIT ANALYZED			32. TOTAL NET	33. RESERVE
			29. Strength	30. Measure	31. Unit		
20	A1838	Mescaline Sulfate					0.1166 gm
21	A1839	3,4-Methylenedioxymethamphetamine HCl					0.0355 gm
22	A1840	3,4-Methylenedioxyethylamphetamine HCl					No reserv

34. ANALYST (Signature) (b)(7)(C)

35. TITLE Forensic Chemist

36. DATE COMPLETED 01/10/95

37. (b)(7)(C)

38. TITLE Laboratory Director

39. LAB. LOCATION

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

REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

1. HOW OBTAINED (Check) Purchase Seizure Free Sample
 Lab. Seizure Money Flashed Compliance Sample (Non-Criminal)
 Other (Specify Surrendered)

2a. FILE NO. R3-93-2077

2b. PROGRAM CODE

3. G-DEP ID (b)(7)(E)

4a. WHERE OBTAINED (City, State/Country) Lafayette, CA

4b. DATE OBTAINED October 31, 1994

5. FILE TITLE (b)(7)(C)

6a. REFERRING AGENCY (Name)

6b. REFERRAL Case No. OR Seizure No. No. _____

7. DATE PREPARED November 1, 1994

8. GROUP NO. 10 - Diversion

9. Exhibit No.	10. FDIN (8 characters)	11. ALLEGED DRUGS	12. MARKS OR LABELS (Describe fully)	APPROX. GROSS QUANTITY		15. Purchase Cost
				13. Seized	14. Submitted	
17		Unknown	Tan powder in glass vial #22212	29.3g.gwt.	29.3g.gwt.	0.
18		Unknown	White powder in glass vial #22226	29.1g.gwt.	29.1g.gwt.	0.
19		Unknown	Tan powder contained capsules further contained in glass vial #22219	37.8g.gwt.	37.8g.gwt.	0.

16. WAS ORIGINAL CONTAINER SUBMITTED SEPARATE FROM DRUG? NO (Included above) YES (If Yes, enter exhibit no. and describe original container fully)

REMARKS:
 On 10/31/94 the above exhibits were surrendered by Dr. SHULGIN at his residence to D/I (b)(7)(C),(b)(7)(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),(b)(7)(F) on 11/03/94.

17. SUBMITTED BY SPECIAL AGENT (Signature) (b)(7)(C),(b)(7)(F) Investigator

18. APPROVED BY (Signature & Title) (b)(7)(C),(b)(7)(F) Group Supervisor

LABORATORY EVIDENCE RECEIPT REPORT

19. No. PACKAGES 3

20. RECEIVED FROM (Signature & Date) RM 662 964 539 11/7/94

21. TITLE ET

22. SEAL Broken Unbroken

24. TITLE

LABORATORY ANALYSIS/COMPARISON REPORT

25. ANALYSIS SUMMARY AND REMARKS

Lab #	Exhibit	Gross WT	Net WT	Gross WT after Analysis
A1835	17	29.68 gm	0.0003 gm	29.93 gm
A1836	18	29.67 gm	0.1549 gm	29.89 gm
A1837	19	38.14 gm	15 capsules (calc. Net WT 1.499 gm)	42.38 gm

*Salt form not determined

26. Exhibit No.	27. Lab. No.	28. ACTIVE DRUG INGREDIENT (Established or Common Name)	WEIGHT PER UNIT ANALYZED			32. TOTAL NET	33. RESERVE
			29. Strength	30. Measure	31. Unit		
17	A1835	2,5-Dimethoxy-4-bromophenethylamine (Salt Not Determined)				0.0001 gm	
18	A1836	Mescaline HCl				0.1420 gm	
19	A1837	3,4-Methylenedioxyamphetamine HCl				14.77 Capsules	

34. ANALYST (Signature) (b)(7)(C)

35. TITLE Forensic Chemist

36. DATE COMPLETED 01/10/95

37. _____

38. TITLE Laboratory Director

39. LAB. LOCATION McLean, VA

L22362

U.S. Department of Justice
Drug Enforcement Administration

REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

1. HOW OBTAINED (Check) Purchase Seizure Free Sample
 Lab. Seizure Money Flashed Compliance Sample (Non-Criminal)
 Other (Specify) **SURRENDERED**

2a. FILE NO. R3-93-2077

2b. PROGRAM CODE

3. G-DEP ID (b)(7)(E)

4a. WHERE OBTAINED (City, State/Country) LAFAYETTE, CA/USA

4b. DATE OBTAINED SEPTEMBER 27, 1994

5. FILE TITLE (b)(7)(C)

6a. REFERRING AGENCY (Name)

6b. REFERRAL Case No. OR Seizure No. No.

7. DATE PREPARED October 28, 1994

8. GROUP NO. 10 - DIVERSION

9. Exhibit No.	10. FDIN (8 characters)	11. ALLEGED DRUGS	12. MARKS OR LABELS (Describe fully)	APPROX. GROSS QUANTITY		15. Purchase Cost
				13. Seized	14. Submitted	
16		UNKNOWN	TAN POWDER AND TABLET CONTAINED IN GLASSINE BAGGIE	28.5G.GMT.	28.5G.GMT.	0.

16. WAS ORIGINAL CONTAINER SUBMITTED SEPARATE FROM DRUG? NO (Included above) YES (If Yes, enter exhibit no. and describe original container fully)

REMARKS:
 ON SEPTEMBER 27, 1994, DR. ALEXANDER SHULGIN SURRENDERED THE EXHIBITS NOTED ABOVE TO DIVERSION INVESTIGATOR (b)(7)(C), (b)(7)(F) WHO SECURED THEM AT THE DEA SFPD. ON OCTOBER 28, 1994, THE EXHIBITS WERE PROCESSED AND FORWARDED TO THE DEA SPECIAL TESTING LABORATORY FOR ANALYSIS.
 (FINGERPRINTS REQUESTED)

17. SUBMITTED BY SPECIAL AGENT (Signature & Title) (b)(7)(C), (b)(7)(F) INVESTIGATOR

18. APPROVED BY (Signature & Title) (b)(7)(C), (b)(7)(F) GROUP SUPERVISOR

19. No. PACKAGES 1

20. RECEIVED FROM (Signature & Date) AL Fed # 37845185 11/2/94

21. TITLE

22. SEAL Broken Unbroken

24. TITLE

LABORATORY ANALYSIS/COMPARISON REPORT

25. ANALYSIS SUMMARY AND REMARKS

Lab #	Exhibit	Gross WT	Net WT	Gross WT after Analysis
A1834	16a	0.842	28.9 gm	5.03208 gm (1 tablet)
	16b		0.102 gm	73.1 gm

26. Exhibit No.	27. Lab. No.	28. ACTIVE DRUG INGREDIENT (Established or Common Name)	WEIGHT PER UNIT ANALYZED			32. TOTAL NET	33. RESERVE
			29. Strength	30. Measure	31. Unit		
16a	A1834	3,4-Methylenedioxyamphetamine HCl				0.1934 gm	
16b		3,4-Methylenedioxymethamphetamine HCl				0.0702 gm	

34. ANALYST (Signature) (b)(7)(C)

35. TITLE Forensic Chemist

36. DATE COMPLETED 01/03/95

37.

38. TITLE Laboratory Director

39. LAB. LOCATION McLean, VA

U.S. Department of Justice
Drug Enforcement Administration

REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

1. HOW OBTAINED (Check) Purchase Seizure Free Sample
 Lab. Seizure Money Flashed Compliance Sample (Non-Criminal)
 Other (Specify **SURRENDERED**)

2a. FILE NO. **R3-93-2077**

2b. PROGRAM CODE

3. G-DEP ID **(b)(7)(E)**

4a. WHERE OBTAINED (City, State/Country) **LAFAYETTE, CA/USA**

4b. DATE OBTAINED **SEPTEMBER 27, 1994**

5. FILE TITLE **(b)(7)(C)**

6a. REFERRING AGENCY (Name)

6b. REFERRAL Case No. OR Seizure No. No.

7. DATE PREPARED **October 28, 1994**

8. GROUP NO. **10 - DIVERSION**

9. Exhibit No.	10. FDIN (8 characters)	11. ALLEGED DRUGS	12. MARKS OR LABELS (Describe fully)	APPROX. GROSS QUANTITY		15. Purchase Cost
				13. Seized	14. Submitted	
13		UNKNOWN	TAN POWDER CONTAINED IN GLASS VIALS	38.9G.GWT.	38.9G.GWT.	0.0
14		UNKNOWN	TABLETS CONTAINED IN BOX	44.39G.GWT	44.39G.GWT	0.0
15		UNKNOWN	TAN POWDER CONTAINED IN CLEAR BAGGIES	23.6G.GWT.	23.6G.GWT.	0.0

16. WAS ORIGINAL CONTAINER SUBMITTED SEPARATE FROM DRUG? NO (Included above) YES (If Yes, enter exhibit no. and describe original container fully)

REMARKS:
 ON SEPTEMBER 27, 1994, DR. ALEXANDER SHULGIN SURRENDERED THE EXHIBITS NOTED ABOVE TO DIVERSION INVESTIGATOR **(b)(7)(C),(b)(7)(F)** WHO SECURED THEM AT THE DEA SFPD. ON OCTOBER 28, 1994, THE EXHIBITS WERE PROCESSED AND FORWARDED TO THE DEA SPECIAL TESTING LABORATORY FOR ANALYSIS.

(FINGERPRINTS REQUESTED)

17. SUBMITTED BY SPECIAL AGENT (Signature & Title) **(b)(7)(C),(b)(7)(F) INVESTIGATOR**

18. APPROVED BY (Signature & Title) **(b)(7)(C),(b)(7)(F) GROUP SUPERVISOR**

LABORATORY EVIDENCE RECEIPT REPORT

19. No. PACKAGES **3**

20. RECEIVED FROM (Signature & Date) **AL... 10/28/94**

21. TITLE

22. SEAL Broken Unbroken

24. TITLE

LABORATORY ANALYSIS/COMPARISON REPORT

25. ANALYSIS SUMMARY AND REMARKS

Lab #	Exhibit	Gross WT	Net WT	Gross WT after Analysis (Note: additional packaging added).
A1831	13	40.3 gm	0.288 gm	43.65 gm
A1832	14	47.2 gm	14 Capsules	56.66 gm
A1833	15	25.1 gm	1 Tablet (0.2742 gm)	29.18 gm

26. Exhibit No.	27. Lab. No.	28. ACTIVE DRUG INGREDIENT (Established or Common Name)	WEIGHT PER UNIT ANALYZED			32. TOTAL NET	33. RESERVE
			29. Strength	30. Measure	31. Unit		
13	A1831	3,4-Methylenedioxymethamphetamine HCl				0.2518 gm	
14	A1832	delta-9-Tetrahydrocannabinol					13 Tablet
15	A1833	3,4-Methylenedioxymethamphetamine Benzilate					0.1101 gm

34. ANALYST (Signature) **(b)(7)(C)**

35. TITLE **Forensic Chemist**

36. DATE COMPLETED **01/04/95**

37. **(b)(7)(C)**

38. TITLE **Laboratory Director**

39. LAB. LOCATION **McLean, VA**

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

REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

1. HOW OBTAINED (Check) <input type="checkbox"/> Purchase <input type="checkbox"/> Seizure <input type="checkbox"/> Free Sample <input type="checkbox"/> Lab. Seizure <input type="checkbox"/> Money Flashed <input type="checkbox"/> Compliance Sample (Non-Criminal) <input type="checkbox"/> Other (Specify <u>SURRENDERED</u>)			2a. FILE NO. <u>R3-93-2077</u>	2b. PROGRAM CODE	3. G-DEP ID <u>(b)(7)(E)</u>	
4a. WHERE OBTAINED (City, State/Country) <u>LAFAYETTE, CA/USA</u>		4b. DATE OBTAINED <u>SEPTEMBER 27, 1994</u>	5. FILE TITLE <u>(b)(7)(C)</u>			
6a. REFERRING AGENCY (Name)		6b. REFERRAL <input type="checkbox"/> Case No. OR <input type="checkbox"/> Seizure No. No. _____	7. DATE PREPARED <u>October 28, 1994</u>	8. GROUP NO. <u>10 - DIVERSION</u>		
9. Exhibit No.	10. FDIN (8 characters)	11. ALLEGED DRUGS	12. MARKS OR LABELS (Describe fully)	APPROX. GROSS QUANTITY		15. Purchase Cost
				13. Seized	14. Submitted	
<u>10</u>		<u>UNKNOWN</u>	<u>WHITE POWDER CONTAINED IN 7 GLASS VIALS</u>	<u>67.4G.GWT.</u>	<u>67.4G.GWT.</u>	<u>0.0</u>
<u>11</u>		<u>UNKNOWN</u>	<u>YELLOW LIQUID CONTAINED IN 3 GLASS VIALS</u>	<u>77.6G.GWT.</u>	<u>77.6G.GWT.</u>	<u>0.0</u>
<u>12</u>		<u>UNKNOWN</u>	<u>TAN POWDER CONTAINED IN 3 PLASTIC BAGGIES</u>	<u>24.6G.GWT.</u>	<u>24.6G.GWT.</u>	<u>0.0</u>

16. WAS ORIGINAL CONTAINER SUBMITTED SEPARATE FROM DRUG? NO (Included above) YES (If Yes, enter exhibit no. and describe original container fully)

REMARKS:
ON SEPTEMBER 27, 1994, DR. ALEXANDER SHULGIN SURRENDERED THE EXHIBITS NOTED ABOVE TO DIVERSION INVESTIGATOR (b)(7)(C),(b)(7)(F) WHO SECURED THEM AT THE DEA SFFD. ON OCTOBER 28, 1994, THE EXHIBITS WERE PROCESSED AND FORWARDED TO THE DEA SPECIAL TESTING LABORATORY FOR ANALYSIS.
(FINGERPRINTS REQUESTED)

17. SUBMITTED BY SPECIAL AGENT (Signature & Title) <u>(b)(7)(C),(b)(7)(F)</u> INVESTIGATOR	18. APPROVED BY (Signature & Title) <u>(b)(7)(C),(b)(7)(F)</u> GROUP SUPERVISOR
---	--

19. No. PACKAGES <u>3</u>	20. RECEIVED FROM (Signature & Date) <u>AL F... 10/28/94</u>	21. TITLE <u>ET</u>
22. SEAL <input type="checkbox"/> Broken <input checked="" type="checkbox"/> Unbroken	23. TITLE <u>(b)(7)(C)</u>	24. TITLE

LABORATORY ANALYSIS/COMPARISON REPORT

25. ANALYSIS SUMMARY AND REMARKS	Lab#	Exhibit	Gross WT	Net WT	Gross WT after Analysis
	A1828	10a,b,d,f,g 10c,e	68.0 gm	0.411 gm 0.030 gm	99.6 gm*
	A1829	11	78.8 gm	4.096 gm	75.6 gm
	A1830	12	25.2 gm	0.178 gm	38.8 gm*

*Substitute Packaging

26. Exhibit No.	27. Lab. No.	28. ACTIVE DRUG INGREDIENT (Established or Common Name)	WEIGHT PER UNIT ANALYZED			32. TOTAL NET	33. RESERVE
			29. Strength	30. Measure	31. Unit		
<u>10a,b,d,f,g</u>	<u>A1828</u>	<u>3,4-Methylenedioxymethamphetamine HCl</u>					<u>0.397 gm</u>
<u>10c,e</u>		<u>2,5-Dimethoxy-4-bromophenethylamine HCl</u>					<u>0.020 gm</u>
<u>11</u>	<u>A1829</u>	<u>INDD</u>					<u>1.93 gm</u>
<u>12</u>	<u>A1830</u>	<u>2,4-Methylenedioxymethamphetamine HCl</u>					<u>0.169 gm</u>

34. ANALYST (Signature) <u>(b)(7)(C)</u>	35. TITLE <u>FORENSIC CHEMIST</u>	36. DATE COMPLETED <u>12/30/94</u>
	38. TITLE <u>LABORATORY DIRECTOR</u>	39. LAB. LOCATION <u>MCLEAN, VA</u>

U.S. Department of Justice
Drug Enforcement Administration

REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

1. HOW OBTAINED (Check) Purchase Seizure Free Sample
 Lab. Seizure Money Flashed Compliance Sample (Non-Criminal)
 Other (Specify)

2a. FILE NO. R3-92-2077

2b. PROGRAM CODE N/A

3. G-DEP ID (b)(7)(E)

4a. WHERE OBTAINED (City, State/Country) Lafayette, CA

4b. DATE OBTAINED October 27, 1994

5. FILE TITLE (b)(7)(C)

6a. REFERRING AGENCY (Name)

6b. REFERRAL Case No. OR Seizure No. No. N/A

7. DATE PREPARED October 28, 1994

8. GROUP NO. TEF

9. Exhibit No.	10. FDIN (8 characters)	11. ALLEGED DRUGS	12. MARKS OR LABELS (Describe fully)	APPROX. GROSS QUANTITY		15. Purchase Cost
				13. Seized	14. Submitted	
7		Unknown	Amber Liquid		45.5 gm	0.00
8		Unknown	White Powder		44.2 gm	0.00
9		Unknown	White Powder		45.8 gm	0.00

16. WAS ORIGINAL CONTAINER SUBMITTED SEPARATE FROM DRUG? NO (Included above) YES (If Yes, enter exhibit no. and describe original container fully)

REMARKS:
 On October 27, 1994, the above exhibits were seized by TFA (b)(7)(C),(b)(7)(F) pursuant to a Federal Administrative Inspection Warrant at 1483 Shulgin Drive, Lafayette, CA. TFA (b)(7)(C),(b)(7)(F) transported the exhibits to SFFD where it was processed as evidence as witnessed by S/A (b)(7)(C),(b)(7)(F). The exhibits were later mailed to DEA Special Testing Research Laboratory, 7704 Old Springhouse Road, McLean, Virginia, for analysis.

17. SUBMITTED BY SPECIAL AGENT (Signature) (b)(7)(C),(b)(7)(F) S/A

LABORATORY EVIDENCE RECEIPT REPORT

19. No. PACKAGES 3

20. RECEIVED FROM (Signature & Date) AL... 11/2/94

21. TITLE

22. SEAL Broken Unbroken (b)(7)(C)

24. TITLE

LABORATORY ANALYSIS/COMPARISON REPORT

25. ANALYSIS SUMMARY AND REMARKS

Lab#	Exhibit	Gross WT	Net WT	Gross WT after Analysis
A1825	7	45.8 gm	1.375 gm	44.6 gm
A1826	8	44.4 gm	0.694 gm	44.4 gm
A1827	9	46.4 gm	1.487 gm	46.1 gm

26. Exhibit No.	27. Lab. No.	28. ACTIVE DRUG INGREDIENT (Established or Common Name)	WEIGHT PER UNIT ANALYZED			32. TOTAL NET WT	33. RESERVE
			29. Strength	30. Measure	31. Unit		
7	A1825	N-Methyl-3,4-Methylenedioxyamphetamine HCl					0.956 gm
8	A1826	3,4-Methylenedioxyamphetamine HCl					0.643 gm
9	A1827	N-(2-Methylethyl)-3,4-methylenedioxyamphetamine hydrochloride					1.407 gm

34. ANALYST (Signature) (b)(7)(C)

35. TITLE Forensic Chemist

36. DATE COMPLETED 12/22/94

38. TITLE Laboratory Director

39. LAB. LOCATION McLean, VA

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

REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

1. HOW OBTAINED (Check) Purchase Seizure Free Sample
 Lab. Seizure Money Flashed Compliance Sample (Non-Criminal)
 Other (Specify)

2a. FILE NO. R3-93-2077
 2b. PROGRAM CODE N/A
 3. G-DEP ID (b)(7)(E)

4a. WHERE OBTAINED (City, State/Country) Lafayette, CA
 4b. DATE OBTAINED October 27, 1994
 5. FILE TITLE (b)(7)(C)

6a. REFERRING AGENCY (Name)
 6b. REFERRAL Case No. OR Seizure No. No. N/A
 7. DATE PREPARED October 28, 1994
 8. GROUP NO. TF1

9. Exhibit No.	10. FDIN (8 characters)	11. ALLEGED DRUGS	12. MARKS OR LABELS (Describe fully)	APPROX. GROSS QUANTITY		15. Purchase Cost
				13. Seized	14. Submitted	
1		Unknown	White Powder		105.9 gm	0.00
2		Unknown	White Powder		106.7 gm	0.00
3		Unknown	Yellow Liquid		42.4 gm	0.00

16. WAS ORIGINAL CONTAINER SUBMITTED SEPARATE FROM DRUG? NO (Included above) YES (If Yes, enter exhibit no. and describe original container fully)

REMARKS:
 On October 27, 1994, the above exhibits were seized by TFA (b)(7)(C),(b)(7)(F) pursuant to a Federal Administrative Inspection Warrant at 1443 Shulgin Drive, Lafayette, CA. TFA (b)(7)(C),(b)(7)(F) transported the exhibits to SFFD where it was processed as evidence as witnessed by S/A (b)(7)(C),(b)(7)(F). The (b)(7)(C),(b)(7)(F) exhibits were later mailed to DEA Special Testing Research Laboratory, 7704 Old Springhouse Road, McLean, Virginia, for analysis.

17. SUBMITTED BY SPECIAL AGENT (Signature) (b)(7)(C),(b)(7)(F) S/A (b)(7)(C),(b)(7)(F)

LABORATORY EVIDENCE RECEIPT REPORT

19. No. PACKAGES 3
 20. RECEIVED FROM (Signature & Date) AL (b)(7)(C) 11/2/94
 21. TITLE
 22. SEAL Broken Unbroken
 23. (b)(7)(C) ET
 24. TITLE

LABORATORY ANALYSIS/COMPARISON REPORT

25. ANALYSIS SUMMARY AND REMARKS

Lab #	Exhibit	Gross WT	Net WT	Gross WT after Analysis
A1819	1	106.5 gm	0.106 gm	105.8 gm
A1820	2	107.0 gm	0.312 gm	106.7 gm
A1821	3	43.3 gm	0.779 gm	42.7 gm

26. Exhibit No.	27. Lab. No.	28. ACTIVE DRUG INGREDIENT (Established or Common Name)	WEIGHT PER UNIT ANALYZED			32. TOTAL NET	33. RESERVE
			29. Strength	30. Measure	31. Unit		
1	A1819	2,5-dimethoxy-4-iodophenethylamine HCl					0.098 gm
2	A1820	3,4-Methylenedioxyphehdrono HCl					0.280 gm
3	A8821	3,4-Methylenedioxymethamphetamine base					0.583 gm

34. ANALYST (Signature) (b)(7)(C)
 35. TITLE Forensic Chemist
 36. DATE COMPLETED 12/20/94
 37. APPROVED BY (b)(7)(C)
 38. TITLE Laboratory Director
 39. LAB. LOCATION McLean, VA

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

REPORT OF DRUG PROPERTY COLLECTED, PURCHASED OR SEIZED

1. HOW OBTAINED (Check) Purchase Seizure Free Sample
 Lab. Seizure Money Flashed Compliance Sample (Non-Criminal)
 Other (Specify)

2a. FILE NO. R3-93-2077

2b. PROGRAM CODE N/A

3. G-DEP ID (b)(7)(E)

4a. WHERE OBTAINED (City, State/Country) Lafayette, CA

4b. DATE OBTAINED October 27, 1994

5. FILE TITLE (b)(7)(C)

6a. REFERRING AGENCY (Name) _____

6b. REFERRAL Case No. OR Seizure No. No. 4/A

7. DATE PREPARED October 28, 1994

8. GROUP NO. FF1

9. Exhibit No.	10. FDIN (8 characters)	11. ALLEGED DRUGS	12. MARKS OR LABELS (Describe fully)	APPROX. GROSS QUANTITY		15. Purchase Cost
				13. Seized	14. Submitted	
<u>4</u>		<u>Unknown</u>	<u>White Powder</u>		<u>106.4 gg</u>	<u>0.00</u>
<u>5</u>		<u>Unknown</u>	<u>White Powder</u>		<u>106.8 gg</u>	<u>0.00</u>
<u>6</u>		<u>Unknown</u>	<u>White Powder</u>		<u>91.8 gg</u>	<u>0.00</u>

16. WAS ORIGINAL CONTAINER SUBMITTED SEPARATE FROM DRUG? NO (Included above) YES (If Yes, enter exhibit no. and describe original container fully)

REMARKS:

On October 27, 1994, the above exhibits were seized by TFA (b)(7)(C),(b)(7)(F) pursuant to a Federal Administrative Inspection Warrant at 1483 Shulgin Drive, Lafayette, CA. TFA (b)(7)(C),(b)(7)(F) transported the exhibits to SFFD where it was processed as evidence as witnessed by S/A (b)(7)(C),(b)(7)(F). The exhibits were later mailed to DEA Special Testing Research Laboratory, 7704 Old Springhouse Road, McLean, Virginia, for analysis.

17. SUBMITTED BY SPE (b)(7)(C),(b)(7)(F)

LABORATORY EVIDENCE RECEIPT REPORT

19. No. PACKAGES 3

20. RECEIVED FROM (Signature & Date) AL F... 11/2/94

21. TITLE _____

22. SEAL Broken Unbroken

24. TITLE _____

LABORATORY ANALYSIS/COMPARISON REPORT

25. ANALYSIS SUMMARY AND REMARKS

Lab #	Exhibit	Gross WT	Net WT	Gross WT after Analysis
<u>A1822</u>	<u>4</u>	<u>107.6 gm</u>	<u>0.1131 gm</u>	<u>106.4 gm</u>
<u>A1823</u>	<u>5</u>	<u>106.8 gm</u>	<u>0.1383 gm</u>	<u>105.8 gm</u>
<u>A1824</u>	<u>6</u>	<u>91.9 gm</u>	<u>12.85 gm</u>	<u>90.7 gm</u>

26. Exhibit No.	27. Lab. No.	28. ACTIVE DRUG INGREDIENT (Established or Common Name)	WEIGHT PER UNIT ANALYZED			32. TOTAL NET	33. RESERVE
			29. Strength	30. Measure	31. Unit		
<u>4</u>	<u>A1822</u>	<u>2,5-Dimethoxy-4-bromophenethylamine HCl</u>					<u>0.068 gm</u>
<u>5</u>	<u>A1823</u>	<u>2-Methoxy-4,5-methylenedioxyamphetamine HCl</u>					<u>0.091 gm</u>
<u>6</u>	<u>A1824</u>	<u>3,4-Methylenedioxyamphetamine tartrate</u>					<u>12.54 gm</u>

34. ANALYST (Signature) (b)(7)(C)

35. TITLE FORENSIC CHEMIST

36. DATE COMPLETED 12/30/94

37. APPROVED BY (b)(7)(C)

38. TITLE LABORATORY DIRECTOR

39. LAB. LOCATION MCLEAN, VA

RECEIVED
SPECIAL AGENT IN CHARGE

DISPOSITION OF DRUG EVIDENCE

(Do NOT Use For Non-Drug Evidence)

FILE NUMBER
R3-93-2077

DATE
March 20, 1996

FILE TITLE

(b)(7)(C)

96 MAR 27

ORIGINATOR (Name of Field Office and Case Agent)
San Francisco Division Office

CUSTODIAN (Name of DEA Laboratory and Laboratory Chief)
Special Testing and Research Laboratory
7704 Old Springhouse Road
McLean, VA 22102-3494
(b)(7)(C) Laboratory 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)

Exhibit No.	Laboratory No.	AGENT Drug	LABORATORY			
			Transferred	Destroyed	Retained	Stock
46	A1864	Unknown tan vegetable matter contained in a box #22231		X		
47	A1865	Unknown tan powder contained in a plastic jar #22206		X		

(b)(7)(C), (b)(7)(F)
CASE AGENT (Signature)
DATE 3/20/96

(b)(7)(C), (b)(7)(F)
APPROVING OFFICIAL (Signature)
DATE 3/22/96

PART II

On 7/19/96 the foregoing exhibits were disposed of as indicated above.
(Date)

On _____ the foregoing exhibits were transferred to _____
(Date) (Agency)

(b)(7)(C)
EVIDENCE TECHNICIAN (Signature and Date)
7/24/96

(b)(7)(C)
WITNESS (Signature and Date)

(b)(7)(C)
LABORATORY CHIEF (Signature and Date)
7/25/96

REMARKS

RECEIVED

DISPOSITION OF DRUG EVIDENCE

(Do NOT Use For Non-Drug Evidence)

96 MAR 27

FILE NUMBER

R3-93-2077

DATE

March 20, 1996

FILE TITLE

(b)(7)(C)

MD

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
McLean, VA 22102-3494

(b)(7)(C)

Laboratory 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

LABORATORY

Exhibit No.	Laboratory No.	Drug	LABORATORY			
			Transferred	Destroyed	Retained	Stock
44	A1862	Unknown tablet in tin foil further contained in a glass vial #22204		X		
45	A1863 ; ; ; ; ; ; ; ;	Unknown tan powder contained in a glass vial #22221		X		

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

ME
CASE AGENT (Signature)

3/20/96
DATE

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

APPROVING OFFICIAL (Signature)

3/22/96
DATE

PART II

On 7/19/96 (Date) the foregoing exhibits were disposed of as indicated above.

On _____ (Date) the foregoing exhibits were transferred to _____ (Agency)

(b)(7)(C)

EVIDENCE TECHNICIAN (Signature and Date)

7/19/96

(b)(7)(C)

V

7/25/96

(b)(7)(C)

LABORATORY CHIEF (Signature and Date)

7/25/96

REMARKS

RECEIVED
TESTING UNIT

DISPOSITION OF DRUG EVIDENCE

(Do NOT Use For Non-Drug Evidence)

FILE NUMBER

R3093-2077

DATE

March 20, 1996

FILE TITLE

(b)(7)(C)

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

McLean, VA 22102-3494

(b)(7)(C)

Laboratory 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			LABORATORY			
Exhibit No.	Laboratory No.	Drug	Transferred	Destroyed	Retained	Stock
41	A1859	Unknown yellow & red tablets contained in a glass vial #22201		X		
42	A1860	Unknown 4 white tablets contained in a glass vial #22203		X		
43	A1861	Unknown 8 white tablets contained in a glass vial #22202		X		

(b)(7)(C),(b)(7)(F)
DIT
CASE AGENT (Signature)

3/20/96
DATE

(b)(7)(C),(b)(7)(F)
3/22/96
APPROVING OFFICIAL (Signature)

DATE

PART II

On 7/19/96 the foregoing exhibits were disposed of as indicated above.
(Date)

On _____ the foregoing exhibits were transferred to _____
(Date) (Agency)

(b)(7)(C)
7/24/96
EVIDENCE TECHNICIAN (Signature and Date)

(b)(7)(C)
7/25/96
WITNESS (Signature and Date)

(b)(7)(C)
7/25/96
LABORATORY CHIEF (Signature and Date)

REMARKS

DISPOSITION OF DRUG EVIDENCE

(Do NOT Use For Non-Drug Evidence)

FILE NUMBER
R3-93-2077

DATE
March 20, 1996

FILE TITLE
(b)(7)(C) M.D.

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
McLean, VA 22102-3494

(b)(7)(C) Laboratory 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)

Exhibit No.	Laboratory No.	AGENT Drug	LABORATORY			
			Transferred	Destroyed	Retained	Stock
38	A1856	Unknown tan powder contained in a glass vial #22225		X		
39	A1857	Unknown tan powder contained in a glass vial #22205		X		
40	A1858	Unknown white powder contained in a glass vial #22217		X		

(b)(7)(C), (b)(7)(F)
[Signature] DATE 3/20/96

(b)(7)(C), (b)(7)(F)
[Signature] DATE 7/24/96

PART II

On 7/19/96 (Date) the foregoing exhibits were disposed of as indicated above.

On _____ (Date) the foregoing exhibits were transferred to _____ (Agency)

(b)(7)(C)
[Signature] DATE 7/24/96

(b)(7)(C)
[Signature] DATE 7/25/96

(b)(7)(C)
[Signature] DATE 7/25/96

REMARKS

DISPOSITION OF DRUG EVIDENCE

(Do NOT Use For Non-Drug Evidence)

FILE NUMBER

R3-93-2077

DATE

March 20, 1996

FILE TITLE

(b)(7)(C) M.D.

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

McLean, VA 22102-3494

(b)(7)(C) Laboratory Directory

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)

Exhibit No.	Laboratory No.	AGENT Drug	LABORATORY			
			Transferred	Destroyed	Retained	Stock
35	A1853	Unknown white powder contained in glass vial #22222		X		
36	A1854	Unknown white crystals contained in a glass vial #22216		X		
37	A1855	Unknown white crystals contained in a glass vial #22227		X		

(b)(7)(C),(b)(7)(F) _____
CASE AGENT (Signature) DATE 3/20/96

(b)(7)(C),(b)(7)(F) _____
APPROVING OFFICIAL (Signature) DATE 7/22/96

PART II

On 7/19/96 (Date) the foregoing exhibits were disposed of as indicated above.

On _____ (Date) the foregoing exhibits were transferred to _____ (Agency)

(b)(7)(C) _____
EVIDENCE TECHNICIAN (Signature and Date) 7/24/96

(b)(7)(C) _____
WITNESS (Signature and Date) 7/25/96

(b)(7)(C) _____
LABORATORY CHIEF (Signature and Date) 7/25/96

REMARKS

60100

RECEIVED
SPECTROSCOPY UNIT

DISPOSITION OF DRUG EVIDENCE

(Do NOT Use For Non-Drug Evidence)

FILE NUMBER

R3-93-0077

DATE

March 20, 1996

FILE TITLE

(b)(7)(C)

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

McLean, VA 22102-3494

(b)(7)(C)

Laboratory 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)

Exhibit No.	Laboratory No.	AGENT Drug	LABORATORY			
			Transferred	Destroyed	Retained	Stock
32	A1850	Unknown white powder contained in a glass vial #22224		X		
33	A1851	Unknown white poystaline powder in a glass vial #22229		X		
34	A1852	Unknown white poysealiline powder in a glass vial #22215		X		

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

CASE AGENT (Signature)

DATE

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

APPROVING OFFICIAL (Signature)

DATE

PART II

On 7/19/96 the foregoing exhibits were disposed of as indicated above.

On _____ the foregoing exhibits were transferred to _____

(Agency)

(b)(7)(C)

EVIDENCE TECHNICIAN (Signature and Date)

7/24/96

(b)(7)(C)

WITNESS (Signature and Date)

7/25/96

(b)(7)(C)

LABORATORY CHIEF (Signature and Date)

7/25/96

REMARKS

RECEIVED

DISPOSITION OF DRUG EVIDENCE

(Do NOT Use For Non-Drug Evidence)

FILE NUMBER

R3-93-2077

DATE

March 20, 1996

'96 MAR 27

FILE TITLE

(b)(7)(C)

M.D.

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 Spinghouse Road

McLean, VA 22102-3494

(b)(7)(C)

Laboratory 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)

Exhibit No.	Laboratory No.	AGENT Drug	LABORATORY			
			Transferred	Destroyed	Retained	Stock
29	A1847	Unknown pink powder contained in a glass vial #22208		X		
30	A1848	Unknown tan powder contained in a glass vial #22230		X		
31	A1849	Unknown white powder contained in a glass vial #22223		X		

ATF (b)(7)(C), (b)(7)(F)
CASE AGENT (Signature)

3/20/96
DATE

(b)(7)(C), (b)(7)(F)
APPROVING OFFICIAL (Signature)

3/22/96
DATE

PART II

On 7/19/96 (Date) the foregoing exhibits were disposed of as indicated above.

On _____ (Date) the foregoing exhibits were transferred to _____ (Agency)

(b)(7)(C)
EVIDENCE TECHNICIAN (Signature and Date)

7/24/96

(b)(7)(C)
WITNESS (Signature and Date)

7/25/96

(b)(7)(C)
LABORATORY CHIEF (Signature and Date)

7/25/96

REMARKS

DISPOSITION OF DRUG EVIDENCE <small>(Do NOT Use For Non-Drug Evidence)</small>	96 MAR 27	FILE NUMBER R3-93-2077	DATE March 20, 1996
		FILE TITLE (b)(7)(C)	
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 McLean, VA 22102-3494 (b)(7)(C) Laboratory 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)

Exhibit No.	Laboratory No.	AGENT Drug	LABORATORY			
			Transferred	Destroyed	Retained	Stock
26	A1844	Unknown white powder contained in a glass vial #22213		X		
27	A1845	Unknown white powder contained in a glass vial #22210		X		
28	A1846	Unknown tan powder contained in a glass vial #22220		X		

(b)(7)(C),(b)(7)(F) _____ CASE AGENT (Signature)	3/20/96 _____ DATE	(b)(7)(C),(b)(7)(F) _____ APPROVING OFFICIAL (Signature)	3/22/96 _____ DATE
--	--------------------------	--	--------------------------

PART II

On 7/19/96 the foregoing exhibits were disposed of as indicated above.
(Date)

On _____ the foregoing exhibits were transferred to _____ (Agency)
(Date)

(b)(7)(C) _____ EVIDENCE TECHNICIAN (Signature and Date)	7/24/96	(b)(7)(C) _____ WITNESS (Signature and Date)
(b)(7)(C) _____ LABORATORY CHIEF (Signature and Date)		7/25/96

REMARKS

RECEIVED

DISPOSITION OF DRUG EVIDENCE

(Do NOT Use For Non-Drug Evidence)

FILE NUMBER

D3-93-2077

DATE

March 20, 1996

FILE TITLE

(b)(7)(C)

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
McLean, VA 22102-3494

(b)(7)(C)

Laboratory 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)

Exhibit No.	Laboratory No.	AGENT Drug	LABORATORY			
			Transferred	Destroyed	Retained	Stock
23	A1841	Unknown Tan powder contained in a glass vial #22228		X		
24	A1842	Unknown brown liquid contained in glass vial #22211		X		
25	A1843	Unknown white powder contained in glass vial #22207		X		

CASE AGENT (Signature)

DATE

APPROVING OFFICIAL (Signature)

DATE

PART II

On 7/19/96 the foregoing exhibits were disposed of as indicated above.

On _____ the foregoing exhibits were transferred to _____

(Agency)

(b)(7)(C)

7/24/96

EVIDENCE TECHNICIAN (Signature and Date)

(b)(7)(C)

7/25/96

WITNESS (Signature and Date)

(b)(7)(C)

7/25/96

LABORATORY CHIEF (Signature and Date)

REMARKS

RECEIVED

DISPOSITION OF DRUG EVIDENCE

(Do NOT Use For Non-Drug Evidence)

FILE NUMBER

R3-93-2077

DATE

March 20, 1996

FILE TITLE

(b)(7)(C)

MD

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

McLean, VA 22102-3494

(b)(7)(C)

Laboratory 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)

Exhibit No.	Laboratory No.	AGENT	Drug	LABORATORY			
				Transferred	Destroyed	Retained	Stock
20	A1838		Unknown White powder contained in glass vial #22214		X		
21	A1839		Unknown tan powder contained in a glass vial #22218		X		
22	A1840		Unknown tan powder contained in a glass vial # (b)(7)(C) 22209		X		

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

CASE AGENT (Signature)

DATE

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

APPROVING OFFICIAL (Signature)

DATE

PART II

On 7/19/96 the foregoing exhibits were disposed of as indicated above.

(Date)

On _____ the foregoing exhibits were transferred to _____

(Date)

(Agency)

(b)(7)(C)

EVIDENCE TECHNICIAN (Signature and Date)

WITNESS (Signature and Date)

(b)(7)(C)

LABORATORY CHIEF (Signature and Date)

REMARKS

DISPOSITION OF DRUG EVIDENCE <small>(Do NOT Use For Non-Drug Evidence)</small>	FILE NUMBER R3-93-2077	DATE March 20, 1996
	FILE TITLE (b)(7)(C)	
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 McLean, VA 22102-3494 (b)(7)(C) Laboratory 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			LABORATORY			
Exhibit No.	Laboratory No.	Drug	Transferred	Destroyed	Retained	Stock
17	A1835	Unknown Tan Powder in glass vial #22212		X		
18	A1836	Unknown White powder in glass vial #22226		X		
19	A1837	Unknown Tan powder contained capsules further contained in glass vial #22219		X		

(b)(7)(C),(b)(7)(F)
 [Signature] _____ DATE 3/20/96
 CASE AGENT (Signature)

(b)(7)(C),(b)(7)(F)
 [Signature] _____ DATE 3/22/96
 APPROVING OFFICIAL (Signature)

PART II

On 7/19/96 (Date) the foregoing exhibits were disposed of as indicated above.

On _____ (Date) the foregoing exhibits were transferred to _____ (Agency)

(b)(7)(C)
 [Signature] _____ DATE 7/24/96
 EVIDENCE TECHNICIAN (Signature and Date)

(b)(7)(C)
 [Signature] _____
 WITNESS (Signature and Date)

(b)(7)(C)
 [Signature] _____ DATE 7/25/96
 LABORATORY CHIEF (Signature and Date)

REMARKS

DISPOSITION OF DRUG EVIDENCE

(Do NOT Use For Non-Drug Evidence)

FILE NUMBER

R3-93-2077

DATE

March 20, 1996

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

770~~4~~ Old Springhouse Road

McLean, VA 22102-3494

(b)(7)(C)

Laboratory 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

LABORATORY

Exhibit No.	Laboratory No.	Drug	LABORATORY			
			Transferred	Destroyed	Retained	Stock
16	A1834	Unknown tan powder and tablet contained in glassine baggie		X		

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

ALC
CASE AGENT (Signature)

3/20/96
DATE

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

3/22/96
APPROVING OFFICIAL (Signature)

DATE

PART II

On *7/19/96* the foregoing exhibits were disposed of as indicated above.
(Date)

On _____ the foregoing exhibits were transferred to _____
(Date) (Agency)

(b)(7)(C)

EVIDENCE TECHNICIAN (Signature and Date)

7/24/96

(b)(7)(C)

WITNESS (Signature and Date)

7/25/96

(b)(7)(C)

LABORATORY CHIEF (Signature and Date)

7/27/96

REMARKS

DISPOSITION OF DRUG EVIDENCE <small>(Do NOT Use For Non-Drug Evidence)</small>	FILE NUMBER R3-93-2077	DATE March 20, 1996
96 MAR 27	FILE TITLE (b)(7)(C)	
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 McLean, VA 22102-3494 (b)(7)(C) Laboratory 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)

Exhibit No.	Laboratory No.	AGENT Drug	LABORATORY			
			Transferred	Destroyed	Retained	Stock
13	A1831	Unknown tan powder contained in glass vials		X		
14	A1832	Unknown tablets contained in box		X		
15	A1833	Unknown tan powder contained in clear baggies		X		

ME (b)(7)(C),(b)(7)(F) _____
CASE AGENT (Signature) DATE 3/20/96

(b)(7)(C),(b)(7)(F) _____
APPROVING OFFICIAL (Signature) DATE 3/22/96

PART II

On 7/19/96 (Date) the foregoing exhibits were disposed of as indicated above.

On _____ (Date) the foregoing exhibits were transferred to _____ (Agency)

(b)(7)(C) _____
EVIDENCE TECHNICIAN (Signature and Date) 7/24/96

(b)(7)(C) _____
WITNESS (Signature and Date) 7/25/96

(b)(7)(C) _____
LABORATORY CHIEF (Signature and Date) 7/25/96

REMARKS

RECEIVED

DISPOSITION OF DRUG EVIDENCE

(Do NOT Use For Non-Drug Evidence)

'96 MAR 2

FILE NUMBER

R3-93-2077

DATE

March 20, 1996

FILE TITLE

(b)(7)(C)

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

4004 Old Springhouse Road

McLean, VAA 22102-3494

(b)(7)(C)

Laboratory 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			LABORATORY			
Exhibit No.	Laboratory No.	Drug	Transferred	Destroyed	Retained	Stock
10	A1828	Unknown white powder contained in 7 glass vials		X		
11	A1829	Unknown yellow liquid contained in 3 glass vials		X		
12	A1830	Unknown tan powder contained in 3 plastic baggies		X		

DIT (b)(7)(C), (b)(7)(F)
CASE AGENT (Signature)

3/20/96
DATE

(b)(7)(C), (b)(7)(F)
APPROVING OFFICIAL (Signature)

3/22/96
DATE

PART II

On 7/19/96 the foregoing exhibits were disposed of as indicated above.
(Date)

On _____ the foregoing exhibits were transferred to _____
(Date) (Agency)

(b)(7)(C)
EVIDENCE TECHNICIAN (Signature and Date)

7/24/96

(b)(7)(C)
WITNESS (Signature and Date)

7/25/96

(b)(7)(C)
LABORATORY CHIEF (Signature and Date)

7/25/96

REMARKS

RECEIVED
SPECIAL TESTING UNIT

DISPOSITION OF DRUG EVIDENCE

(Do NOT Use For Non-Drug Evidence)

FILE NUMBER
R3-93-2077

DATE
March 20, 1996

FILE TITLE
(b)(7)(C)

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
McLean, VA 22102-3494
(b)(7)(C) Laboratory 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)

Exhibit No.	Laboratory No.	AGENT Drug	LABORATORY			
			Transferred	Destroyed	Retained	Stock
7	A1825	Unknown Amber Liquid		X		
8	A1826	Unknown White Powder		X		
9	A1827	Unknown White Powder		X		

DI (b)(7)(C), (b)(7)(F) 3/20/96
CASE AGENT (Signature) DATE

(b)(7)(C), (b)(7)(F) 3/22/96
APPROVING OFFICIAL (Signature) DATE

PART II

On 7/19/96 (Date) the foregoing exhibits were disposed of as indicated above.

On _____ (Date) the foregoing exhibits were transferred to _____ (Agency)

(b)(7)(C) 7/24/96
EVIDENCE TECHNICIAN (Signature and Date)

(b)(7)(C) 7/25/96
WITNESS (Signature and Date)

(b)(7)(C) 7/25/96
LABORATORY CHIEF (Signature and Date)

REMARKS

DISPOSITION OF DRUG EVIDENCE 86 MAR 27

(Do NOT Use For Non-Drug Evidence)

FILE NUMBER

R3-93-2077

DATE

March 20, 1996

FILE TITLE

(b)(7)(C)

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

McLean, VA 22102-3494

(b)(7)(C)

Laboratory 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			LABORATORY			
Exhibit No.	Laboratory No.	Drug	Transferred	Destroyed	Retained	Stock
4	A1822	Unknown White Powder		X		
5	A1823	Unknown White Powder		X		
6	A1824	Unknown White Powder		X		

ME (b)(7)(C),(b)(7)(F)
CASE AGENT (Signature)

3/20/96
DATE

(b)(7)(C),(b)(7)(F)
APPROVING OFFICIAL (Signature)

3/22/96
DATE

PART II

On 7/19/96 the foregoing exhibits were disposed of as indicated above.
(Date)

On _____ the foregoing exhibits were transferred to _____
(Date) (Agency)

(b)(7)(C)

EVIDENCE TECHNICIAN (Signature and Date)

7/24/96

(b)(7)(C)

WITNESS (Signature and Date)

7/25/96

(b)(7)(C)

LABORATORY CHIEF (Signature and Date)

7/25/96

REMARKS

DISPOSITION OF DRUG EVIDENCE

(Do NOT Use For Non-Drug Evidence)

FILE NUMBER
R3-93-2077

DATE
March 20, 1996

FILE TITLE
(b)(7)(C)

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
McLean, VA 22102-3494
(b)(7)(C), Laboratory 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)

Exhibit No.	Laboratory No.	AGENT Drug	LABORATORY			
			Transferred	Destroyed	Retained	Stock
1	A1819	Unknown White Powder		X		
2	A1820	Unknown White Powder		X		
3	A1821	Unknown Yellow Liquid		X		

(b)(7)(C), (b)(7)(F)
DE
CASE AGENT (Signature)

3/20/96
DATE

(b)(7)(C), (b)(7)(F)
APPROVING OFFICIAL (Signature)

3/22/96
DATE

PART II

On 7/19/96 the foregoing exhibits were disposed of as indicated above.
(Date)

On _____ the foregoing exhibits were transferred to _____
(Date) (Agency)

(b)(7)(C)
EVIDENCE TECHNICIAN (Signature and Date)

7/24/96

(b)(7)(C)
WITNESS (Signature and Date)

7/24/96

(b)(7)(C)

7/25/96

LABORATORY CHIEF (Signature and Date)

REMARKS

001071

REPORT OF INVESTIGATION

Page 1 of 1

1. Program Code	2. Cross File	Related Files	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	<input type="checkbox"/>	<input type="checkbox"/>	6. File Title (b)(7)(C)	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:	<input type="checkbox"/>	<input type="checkbox"/>	8. Date Prepared December 30, 1996	
9. Other Officers:				
10. Report Re: Receipt of DEA Form 48s from Special Testing Laboratory (PM40)				

DETAILS:

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

ATTACHMENTS:

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

INDEXING SECTION:

AX 1. (b)(7)(C)

11. Distribution:	(b)(7)(C), (b)(7)(F)	13. Date
Division	D/I	12/31/96
District	(b)(7)(C), (b)(7)(F)	15. Date
Other	ervisor	12/31/96
SARI, ODOD		

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

DEA SENSITIVE
Drug Enforcement Administration

2 - SARI (Pink)

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

Previous edition dated 5/80 may be used.

REPORT OF INVESTIGATION

1. Program Code	2. Cross File <input type="checkbox"/>	Related Files	3. File No. R3-93-2077	4. G-DEP Identifier (b)(7)(E)
5. By: (b)(7)(C),(b)(7)(F) At: Diversion Investigator San Francisco, CA	<input type="checkbox"/>		6. File Title (b)(7)(C)	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:	<input type="checkbox"/>		8. Date Prepared March 21, 1996	
9. Other Officers:				
10. Report Re: Response to Special Testing Laboratory Memo, request for destruction of drug evidence (PM40)				

DETAILS:

- Reference is made to the attached memo dated February 21, 1996 forwarded by (b)(7)(C), Laboratory Director for the Special Testing and Research Laboratory. Mr. (b)(7)(C) has requested that the San Francisco Division Office reconcile its list of drug exhibits to determine discrepancies and that the office submit a DEA Form 48 for any evidence which may be destroyed. The Special Testing and Research Laboratory lists exhibits 1-47 for this case number.
- After a review of the case file, it was determined that exhibits 1-47 that were sent to the Special Testing Laboratory pertained to exhibits gathered at the residence of Alexander SHULGIN. As Dr. SHULGIN has surrendered his DEA registration and been ordered to pay a civil fine, it was determined that the exhibits obtained at SHULGIN's residence were no longer needed in this case. As a result, DEA Form 48's for these exhibits will be forwarded to the Special Testing and Research Laboratory for destruction. A memo requesting the destruction will also be sent to the Special Testing and Research Laboratory and is attached to this report.
- During a review of the case file, it was noted that some duplicate drug exhibit numbers had been given. Separate warrants were served at SHULGIN's address and at Dr. (b)(7)(C) address and at each location drug exhibits were obtained. (b)(7)(C) exhibits obtained from SHULGIN were sent to the Special Testing and Research Laboratory.
- (b)(7)(C)

ATTACHMENTS:

- Memo from Special Testing and Research Laboratory
- Memo requesting destruction of exhibits
- DEA Form 48s (17)

11. Distribution: Division	12. (b)(7)(C),(b)(7)(F)	13. Date 4/8/96
District	14. (b)(7)(C),(b)(7)(F)	15. Date 4/8/96
Other SARI, ODOD	Supervisor	

DEA Form (Aug. 1994) - 6

DEA SENSITIVE
Drug Enforcement Administration

2 - AMRI (PINK)

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

Previous edition dated 5/80 may be used.

REPORT OF INVESTIGATION (Continuation)	1. File No. R3-93-2077	2. G-DEP Identifier (b)(7)(E)
	3. File Title (b)(7)(C)	
4. Page 2 of 2	6. Date Prepared March 21, 1996	
5. Program Code		

INDEXING SECTION:

- AX 1. (b)(7)(C)
- AX 2. SHULGIN, Alexander - Naddis: 294983

REPORT OF INVESTIGATION

1. Program Code	2. Cross File File	Related Files	3. File No. R3-93-2077	4. G-DEP Identifier (b)(7)(E)
5. By: (b)(7)(C),(b)(7)(F) At: Diversion Investigator San Francisco, CA	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		File Title A (b)(7)(C)	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:			8. Date Prepared January 12, 1996	
9. Other Officers:				

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

DETAILS:

- 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).
- The subject settlement agreement resulted from the DEA SFFD Diversion Unit's Investigation of SHULGIN and his Analytical Laboratory which revealed (52) violations of 21 U.S.C. section 842(a) for failure to keep, maintain or furnish controlled substance records.
- In addition, SHULGIN surrendered his DEA Certificate (see attachment #3) and unused order form. SHULGIN had no controlled substances to surrender. SHULGIN submitted an extensive list of controlled substances (see attachment #4) that he claims to have neutralized and flushed down his toilet on February 25, 1995, in his laboratory. SHULGIN conducted this destruction of controlled substances without DEA authority or proper documentation.

ATTACHMENTS:

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

INDEXING SECTION:

11. Distribution:	12. (b)(7)(C),(b)(7)(F)	13. Date 1/17/96
Division		
District	14. (b)(7)(C),(b)(7)(F)	15. Date 1/17/96
Other SARI, ODOD		
	Investigator	
	Supervisor	

DEA Form (Aug. 1994) - 6

DEA SENSITIVE
Drug Enforcement Administration

2 - AMRI (PINK)

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

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. R3-93-2077	2. G-DEP Identifier (b)(7)(E)
	3. File Title (b)(7)(C)	
4. Page 2 of 2	6. Date Prepared January 12, 1996	
5. Program Code		

1. SHULGIN, ALEXANDER T. - NADDIS: 294983, ~~1904492~~

REPORT OF INVESTIGATION

1. Program Code	2. Cross File <input type="checkbox"/>	Related Files	3. File No. R3-93-2077	4. G-DEP Identifier (b)(7)(E)
5. By: (b)(7)(C),(b)(7)(F) At: Investigator San Francisco, CA	<input type="checkbox"/>	AX	6. File Title (b)(7)(C)	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:	<input type="checkbox"/>		8. Date Prepared November 28, 1995	
9. Other Officers:				
10. Report Re: Meeting with AUSA (b)(7)(C) Alexander SHULGIN financial statement, pending financial settlement and surrender of DEA Registration (RA40)				

DETAILS:

1. On November 27, 1995, Investigator (b)(7)(C), (b)(7)(F) met with AUSA (b)(7)(C) who stated that Alexander SHULGIN has agreed to pay a \$20,000.00 fine and a surrender of his DEA Registration PS0061616 to settle the government's case against him. A Show Cause has been issued against SHULGIN's DEA Registration.

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

-SHULGIN has significant assets including stocks totaling \$220,931.00 and saving accounts totaling \$220,822.00

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

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

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

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

-Alexander SHULGIN travels to Spain, Italy and Russia.

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

11. Distribution:	(b)(7)(C),(b)(7)(F)	13. Date 11/30/95
Division		
District	14. Appr (b)(7)(C),(b)(7)(F)	15. Date 11/30/95
Other SARI, ODOD	Supervisor	

DEA Form (Aug. 1994) - 6

DEA SENSITIVE
Drug Enforcement Administration

2 - AMRI (PINK)

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

Previous edition dated 5/80 may be used.

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

ATTACHMENTS:

1. Alexander SHULGIN financial statement

INDEXING SECTION:

- A
AT
AT
AD
1. SHULGIN, Alexander - NADDIS: 294983
 2. ALDRICH CHEMICAL - NADDIS: 622721 (b)(7)(C)
 3. BRYANT LABS - NADDIS: 1732896
 4. (b)(7)(C)

REPORT OF INVESTIGATION

Page 1 of 1

1. PROGRAM CODE		2. CROSS FILE	RELATED FILES	3. FILE NO. R3-93-2077	4. G-DEP IDENTIFIER (b)(7)(E)
5. BY: (b)(7)(C),(b)(7)(F) AT: Investigator San Francisco, CA		<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	AX	6. FILE TITLE (b)(7)(C)	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:				8. DATE PREPARED August 25, 1995	
9. OTHER OFFICERS: D/I (b)(7)(C),(b)(7)(F)					
10. REPORT RE: Alexander SHULGIN (NADDIS: 294983) Proposal to AUSA (RA40)					

DETAILS:

1. Reference is made to the attached correspondence, dated August 17, 1995, from SHULGIN's attorney (b)(7)(C) to AUSA (b)(7)(C) referencing his meeting with D/I's (b)(7)(C),(b)(7)(F) and his proposal that Alexander SHULGIN maintain his Analytical Laboratory DEA registration and that SHULGIN would adhere to all DEA and state requirements. Attorney (b)(7)(C) made no reference to settling the pending civil action by the U.S. Attorneys' Office.

2. AUSA (b)(7)(C) has requested that SHULGIN submit a financial statement.

3. It should be noted that the DEA has filed a Order to Show Cause against Alexander SHULGIN's Analytical Lab Registration. Judge Bittner has set a hearing date for February 13, 1995.

ATTACHMENTS:

1. Attorney (b)(7)(C) correspondence dated August 17, 1995

INDEXING SECTION:

AX 1. SHULGIN, Alexander - NADDIS: 294983

11. DISTRIBUTION:	12. (b)(7)(C),(b)(7)(F)	13. DATE 8/30/95
REGION	[Redacted]	15. DATE 9/30/95
DISTRICT		
OTHER		

DEA Form (May 1980) - 6

AMRI, ODOB (b)(7)(C) 082995

DEA SENSITIVE
DRUG ENFORCEMENT ADMINISTRATION

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

REPORT OF INVESTIGATION

Page 1 of 2

1. PROGRAM CODE		2. CROSS FILE		3. FILE NO.		4. G-DEP IDENTIFIER	
				R3-93-2077		(b)(7)(E)	
5. BY: (b)(7)(C),(b)(7)(F)		<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		6. FILE TITLE		(b)(7)(C)	
AT: Investigator San Francisco, CA				(b)(7)(C)			
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:				8. DATE PREPARED		August 16, 1995	
9. OTHER OFFICERS: D/I (b)(7)(C),(b)(7)(F)							
10. REPORT RE: Meeting with SHULGIN's Attorney, Status Report (RA40)							

DETAILS:

1. On August 15, 1995, Diversion Investigators (b)(7)(C),(b)(7)(F) met with Alexander SHULGIN's (NADDIS 294983) attorney (b)(7)(C) at the San Francisco United States Attorney's office. AUSA (b)(7)(C) was detained in court and was unable to attend. The DEA investigators and attorney (b)(7)(C) discussed the settlement of the pending civil action against his client. (b)(7)(C) stated that SHULGIN wants to maintain his DEA registration under the supervision of the DEA. (b)(7)(C) also stated that SHULGIN will continue doing drug research with or without a DEA registration and that if he continues to be registered with the DEA it will be easier for DEA to keep an eye on (b)(7)(C), (b)(7)(F) SHULGIN. Investigator (b)(7)(C) advised (b)(7)(C) that due to Dr. SHULGIN's violative history with the DEA and the amount of violations discovered during the DEA investigation, the DEA is actively pursuing the revocation of SHULGIN's DEA registration. (b)(7)(C) stated that he would forward a proposal to AUSA (b)(7)(C) indicating that SHULGIN would like to maintain his registration as part of the settlement.

2. In reference to civil fines, (b)(7)(C) stated that SHULGIN does not have a lot of money and that SHULGIN is paying to have his property cleaned up to satisfy state and federal EPA authorities. (b)(7)(C) also stated that SHULGIN is currently visiting Spain. (b)(7)(C) stated that he is handling this case pro bono because he consults with SHULGIN with regard to methamphetamine cases. (b)(7)(C) stated that he would forward a proposal to AUSA (b)(7)(C) by the end of the week.

3. Reference is made to the ongoing show cause action against SHULGIN's Analytical Lab registration. The government has filed its prehearing statement. Attached to this report is Respondent's prehearing statement in this matter. A hearing date is pending.

ATTACHMENTS:

- Respondent's Prehearing statement, dated July 31, 1995

11. DISTRIBUTION:		(b)(7)(C),(b)(7)(F)	13. DATE
REGION			8/17/95
DISTRICT			8/19/95
OTHER			

DEA Form (May 1980) - 6
AMRI ODOB
(b)(7)(C) 081795

DEA SENSITIVE
DRUG ENFORCEMENT ADMINISTRATION

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

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. R3-93-2077	2. G-DEP Identifier (b)(7)(E)
	3. File Title (b)(7)(C)	
	4. Page 2 of 2	5. Program Code

INDEXING SECTION:

AX 1. SHULGIN, Alexander - NADDIS: 294983

REPORT OF INVESTIGATION

1. Program Code	2. Cross File <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Related Files	3. File No. R3-93-2077	4. G-DEP Identifier (b)(7)(E)
5. By: (b)(7)(C),(b)(7)(F) At: Investigator San Francisco, CA			6. File Title AX (b)(7)(C)	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:			8. Date Prepared June 9, 1995	
9. Other Officers: S/A (b)(7)(C),(b)(7)(F)				
10. Report Re: Alexander SHULGIN/Analytical Lab. AUSA Letter and Draft Complaint Citing 52 Violations of 21 USC842(a)(5)(RA40)				

DETAILS:

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

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

ATTACHMENTS:

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

INDEXING SECTION:

1. SHULGIN, Alexander - NADDIS: 294983

11. Distribution: Division	12. (b)(7)(C),(b)(7)(F)	13. Date
District (b)(7)(C)	14.	15. Date 6/30/95
Other AMRI, ODOD	Supervisor	

DEA Form - 6
(Aug. 1994)

DEA SENSITIVE
Drug Enforcement Administration

2 - AMRI (PINK)

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

Previous edition dated 5/80 may be used.

REPORT OF INVESTIGATION

1. Program Code	2. Cross File <input type="checkbox"/>	Related Files	3. File No. R3-93-2077	4. G-DEP Identifier (b)(7)(E)
5. By: (b)(7)(C),(b)(7)(F) At: Investigator San Francisco, CA	<input type="checkbox"/>		6. File Title (b)(7)(C)	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:	<input type="checkbox"/>		8. Date Prepared April 27, 1995	
9. Other Officers:				
10. Report Re: Order to Show Cause, Alexander SHULGIN (NADDIS: 294983, 1904492), DEA #PS0061616, Analytical Lab (RA40)				

SYNOPSIS:

On April 14, 1995, DEA issued an 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:

- 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).
- 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:
 - 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.
 - Subsequently, on June 9, 1977, the DEA revoked SHULGIN's previous registration, PS0026206, as a researcher.

11. Distribution:	(b)(7)(C),(b)(7)(F)	13. Date	5/8/95
Division		Investigator	
District		Group Supervisor	5/9/95
Other	AMRI, ODOD		

DEA Form - 6
(Aug. 1994)

(b)(7)(C)

DEA SENSITIVE
Drug Enforcement Administration

2 - AMRI (PINK)

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

Previous edition dated 5/80 may be used.

REPORT OF INVESTIGATION (Continuation)	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
	4. Page 2 of 5	
5. PROGRAM CODE	6. DATE PREPARED April 27, 1995	

- 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, Methcathinone, MDMA, and their analogs. This activity was also in violation of California Health and Safety Code Section 11401 and 11054-55. SHULGIN also failed to maintain any records documenting his manufacture of these substances.
2. On September 27, 1994, during an administrative inspection of the area of the registered location described as the laboratory, investigators found 3.42 grams of 2C-B, and 0.9 grams of Methcathinone, both Schedule I controlled substances. SHULGIN stated that his research involved the use of both (b)(7)(C) in San Francisco, and that SHULGIN transported controlled substances between the two locations. SHULGIN failed to complete and maintain DEA Forms 222 or other records to document these transfers. This activity constitutes a violation of 21 USC 841(a)(1). In addition, SHULGIN also stored numerous controlled substance analogs without the documentation required by the California Health and Safety Code Section 11400 et. seq.
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 (May 1980) - 6a (b)(7)(C)

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

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

Previous edition may be used.

REPORT OF INVESTIGATION (Continuation)	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
4. Page 3 of 5	6. DATE PREPARED April 27, 1995	
5. PROGRAM CODE		

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

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

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

Previous edition may be used.

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
4. Page 4 of 5		
5. PROGRAM CODE	6. DATE PREPARED April 27, 1995	

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 Anhydroecgonine. 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 (May 1980) - 6a (b)(7)(C)

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

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

Previous edition may be used.

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
4. Page 5 of 5	6. DATE PREPARED April 27, 1995	
5. PROGRAM CODE		

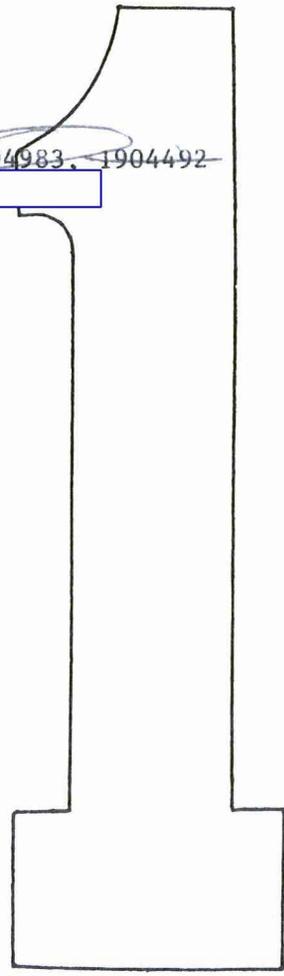
4. The investigation of SHULGIN by the DEA has also been forwarded to the AUSA's Office for civil action.

ATTACHMENTS:

1. Show Cause Order

INDEXING SECTION:

1. SHULGIN, Alexander - NADDIS: 294983, 1904492
2. (b)(7)(C)



REPORT OF INVESTIGATION

1. Program Code	2. Cross File <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Related Files	3. File No. R3-93-2077	4. G-DEP Identifier (b)(7)(E)
5. By: (b)(7)(C),(b)(7)(F) At: Investigator San Francisco, CA			6. File Title AX (b)(7)(C)	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:			8. Date Prepared April 26, 1995	
9. Other Officers:				

10. Report Re: Meeting with EPA Re: SHULGIN'S Laboratory (RA40)

DETAILS:

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

INDEXING SECTION:

- AX SHULGIN, Alexander - NADDIS: 294983, 1904492

0000 2 III -8 6321

11. Distribution:	12	(b)(7)(C),(b)(7)(F)	13. Date 5/2/95
Division			
District	14		15. Date 5/4/95
Other AMRI, ODO, SFED-LAB 6p			visor

DEA Form (Aug. 1994) - 6

DEA SENSITIVE
Drug Enforcement Administration

2 - AMRI (PINK)

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

Previous edition dated 5/80 may be used.

REPORT OF INVESTIGATION

Page 1 of 1

1. PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE NO. R3-93-2077	4. G-DEP IDENTIFIER (b)(7)(E)
5. BY (b)(7)(C),(b)(7)(F) G/S AT Milwaukee, Wisconsin	<input checked="" type="checkbox"/> GFI3-91-3009 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		6. FILE TITLE (b)(7)(C) AP (b)(7)(C)	
7. <input type="checkbox"/> Closed <input checked="" type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:			8. DATE PREPARED April 19, 1995	
9. OTHER OFFICERS:				
10. REPORT RE Sales Data fromf ALDRICH CHEMICAL COMPANY, INC., Milwaukee, WI by ALEXANDER SHULGIN RESEARCH INSTITUTE				

DETAILS:

- Reference is made to Report of Investigation dated January 25, 1995, subject file, requesting sales information from ALDRICH CHEMICAL COMPANY, INC., Milwaukee, Wisconsin by Dr. Alexander Shulgin.
- Attached is a printout dated March 15, 1995, from ALDRICH CHEMICAL reflecting the two purchases of 2,5-Dimethoxyphenethylamine previously referred to the San Francisco DEA Office.
- On March 28, 1995, a second subpoena requesting all sales of chemicals and chemical equipment from 1/1/93 to the present was issued to the firm. Attached is a printout dated March 29, 1995 reflecting 25 transactions to the firm.
- No further action by the Milwaukee DEA Office is deemed necessary at this time.

INDEXING SECTION:

- ALDRICH CHEMICAL COMPANY NADDIS #665089
- SHULGIN, Alexander NADDIS #294983

ATTACHMENTS:

- ALDRICH letter dated March 24, 1995 with enclosures.
ALDRICH letter dated April 10, 1995 with enclosures.

11. DISTRIBUTION: REGION CHICAGO DIG	12. SIGNATURE (Agent)	13. DATE
DISTRICT SAN FRANCISCO	14. APPROVED (Name and Title)	15. DATE
OTHER HQS:AMRI, ODO, ODOC	(b)(7)(C),(b)(7)(F) G/S	

DEA FORM (May 1980) 6

04/28/95 (b)(7)(C)

DEA SENSITIVE
DRUG ENFORCEMENT ADMINISTRATION

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

REPORT OF INVESTIGATION

Page 1 of 1

1. PROGRAM CODE	2. CROSS FILE RELATED FILES	3. FILE NO. R3-93-2077	4. G-DEP IDENTIFIER (b)(7)(E)
5. BY: (b)(7)(C),(b)(7)(F) AT: Investigator San Francisco, CA	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	6. FILE TITLE (b)(7)(C) AIX (b)(7)(C)	8. DATE PREPARED March 9, 1995
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:	9. OTHER OFFICERS:		
10. REPORT RE: Dr. SHULGIN's DEA Renewal Application, DEA #PS0061616 (RA40)			

DETAILS:

1. On March 8, 1995, Dr. SHULGIN's attorney (b)(7)(C) telephonically contacted (b)(7)(C),(b)(7)(F) Investigator (b)(7)(F) and requested information on the status of Dr. SHULGIN's renewal application for registration as an Analytical Lab, Schedules 1-5. (b)(7)(C) also stated that he received a call from Dr. SHULGIN's associate, (b)(7)(C). (b)(7)(C) asked Investigator (b)(7)(C), (b)(7)(F) if an AUSA was requesting a grand jury relating to the investigation of Dr. SHULGIN or (b)(7)(C) Investigator (b)(7)(C), (b)(7)(F) responded that he was not aware of a grand jury inquiry at this time.

2. On March 9, 1995, Investigator (b)(7)(C), (b)(7)(F) contacted (b)(7)(C) ODOC regarding SHULGIN's renewal application. (b)(7)(C) located the subject application and stated that she was maintaining the application because there is an Administrative Code 6 placed on the registration based on a pending Show Cause action against SHULGIN's DEA registration. (b)(7)(C) faxed a copy of SHULGIN's renewal application to the DEA SFFD. The application is dated January 27, 1995. SHULGIN failed to note on his application that he had his DEA Schedule 1 Researcher registration revoked in 1977 by the DEA and his stated Schedule 1 research authority revoked by the California Research Advisory Panel.

ATTACHMENTS:

- 1. SHULGIN DEA Renewal Application

INDEXING SECTION:

- 1. SHULGIN, Alexander - NADDIS: 294983, 1904492
- 2. (b)(7)(C)

11. DISTRIBUTION: REGION	(b)(7)(C),(b)(7)(F)	13. DATE 3/16/95
DISTRICT		15. DATE 3/17/95
OTHER AMRI, ODOC	Supervisor	

DEA Form (May 1980) - 6

(b)(7)(C)

DEA SENSITIVE
DRUG ENFORCEMENT ADMINISTRATION

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

REPORT OF INVESTIGATION

Page 1 of 1

1. PROGRAM CODE		2. CROSS FILE	RELATED FILES	3. FILE NO. R3-93-2077	4. G-DEP IDENTIFIER (b)(7)(E)
5. BY: (b)(7)(C),(b)(7)(F) AT: Investigator San Francisco, CA		<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		6. FILE TITLE (b)(7)(C) AX (b)(7)(C)	
<input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> 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 SHULGIN, Chemicals dumped on property (RA40)					

DETAILS:

1. On March 1, 1995, Investigator (b)(7)(C), (b)(7)(F) received a case file from (b)(7)(C) Hazmat Specialist, Contra Costa County Health Services Department, documenting the environmental investigation of Alexander SHULGIN, see attachment #1. A criminal environmental search warrant was executed on SHULGIN's residence on 10/27/94 in conjunction with the service of a DEA Administrative Warrant. During the service of the warrants SHULGIN stated that he dumped various chemicals into the ground on his property including the heavy metal mercury. Soil samples were taken by Hazmat specialists pursuant to the warrant. Analysis of the soil samples was conducted by GTEL Environmental Laboratories, Inc. A copy of GTEL's analysis is attached to this report.

2. Reference is made to the attached copy of a letter from DA (b)(7)(C) to Hazmat Specialist (b)(7)(C) documenting that SHULGIN paid \$3,000 dollars to cover Hazmat costs and that "The Lab results showed no hazardous waste violations except for one spot where the Mercury level was a little high." The letter also states that SHULGIN claims to have very little money.

3. On March 1995, Investigator (b)(7)(C), (b)(7)(F) contacted Supervisory EPA Agent (b)(7)(C),(b)(7)(F) (b)(7)(C) regarding possible federal violations in this matter. S/A (b)(7)(C),(b)(7)(F) stated that he would look into the possibility that EPA could conduct an emergency assessment of SHULGIN's property.

ATTACHMENTS:

- 1. Hazmat Case File
- 2. DA Letter

INDEXING SECTION:

SHULGIN, Alexander - NADDIS: 294983 (b)(7)(C),(b)(7)(F)

11. DISTRIBUTION:	REGION	12 14	13. DATE 3/8/95
	DISTRICT		
	OTHER AMRT, ODOD		

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

DEA SENSITIVE
DRUG ENFORCEMENT ADMINISTRATION

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

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
4. Page 2 of 3	6. DATE PREPARED February 9, 1995	
5. PROGRAM CODE		

(b)(7)(C)

Dr. SHULGIN has provided the DEA with drug patent information documenting illegal human drug testing, see attachment #3.

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

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

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

DEA SENSITIVE
DRUG ENFORCEMENT ADMINISTRATION
This report is the property of the Drug Enforcement Administration.
Neither it nor its contents may be disseminated outside the Agency to which loaned.

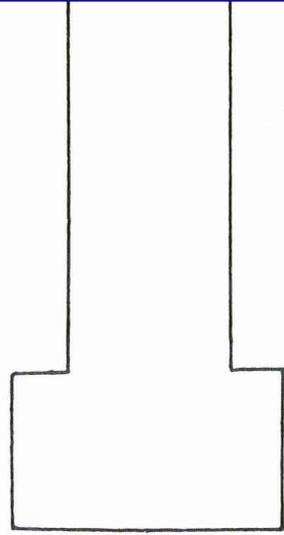
Previous edition may be used.

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
4. Page 3 of 3	6. DATE PREPARED February 9, 1995	
5. PROGRAM CODE		

ATTACHMENTS:

- (b)(7)(C)
2. DEA Statement
 3. Shulgin-(b)(7)(C) drug patent information
- INDEXING SECTION:
1. A SHULGIN, Alexander ^{2 5} - NADDIS: 294983, ^{SWR} 1904492

(b)(7)(C)



REPORT OF INVESTIGATION

Page 1 of 2

1. PROGRAM CODE		2. CROSS FILE	3. FILE NO. R3-93-2077	4. G-DEP IDENTIFIER (b)(7)(E)
5. BY: AT: Investigator San Francisco, CA		<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	6. FILE TITLE (b)(7)(C)	
<input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:			8. DATE PREPARED February 6, 1995	
9. OTHER OFFICERS:				
10. REPORT RE: Results of STRL Analysis of Drug Exhibits resulting from Shulgin Warrants, Drug Exhibits 29-47 (RA40)				

DETAILS:

- Reference is made to the attached DEA-7's documenting the results of the DEA Special Testing Research Laboratory (STRL) analysis of drug exhibits taken during the Warrants at Dr. Alexander SHULGIN's residence/laboratory, see attachment #1.
- See attached DEA STRL memos summarizing drug analysis of drug exhibits 29-47, see attachment #2.
- STRL analysis of drug exhibits 29-47 are as follows:

Exhibit #	Lab #	Active Ingredient	Drug Schedule
29	A1847	No controlled substances detected	None
30	A1848	Trans-isoapiol (non controlled precursor chemical	Sch. I
31	A1849	2,5-Dimethoxy-4-bromophenethylamine Hcl	Sch. I
32	A1850	3,4-Methylenedioxyamphetamine HCl	Sch. I
33	A1851	Mescaline HCl	Sch. I
34	A1852	Mescaline Sulfate	Sch. I
35	A1853	3,4-Methylenedioxyamphetamine HCl	Sch. I
36	A1854	Mescaline HCl	Sch. I
37	A1855	Mescaline HCl	Sch. I
38	A1856	3,4-Methylenedioxymethamphetamine phosphate	Sch. I
39	A1857	3,4-Methylenedioxymethamphetamine phosphate	Sch. I
40	A1858	3,4-Methylenedioxymethamphetamine sulfate	Sch. I
41	A1859	A Phencyclidine HCl (PCP)	Sch. I
		B Phencyclidine HCl (PCP)	Sch. I
42	A1960	Methorphan HCl and Ephedrine HCl	None
43	A1861	Methorphan HCl and Ephedrine HCl	None
44	A1862	3,4-Methylenedioxyamphetamine HCl	Sch. I
45	A1863	3,4-Methylenedioxymethamphetamine HCl and	Sch. I

11. DISTRIBUTION:		12. (b)(7)(C), (b)(7)(F)	13. DATE 2/7/95
REGION			
DISTRICT			15. DATE 2/9/95
OTHER	AMRI, ODOD	Supervisor	

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

DEA SENSITIVE
DRUG ENFORCEMENT ADMINISTRATION

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

REPORT OF INVESTIGATION (Continuation)	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
4. Page 2 of 2	6. DATE PREPARED February 6, 1995	
5. PROGRAM CODE		

46	A1864	Methorphan HCl	Sch. I
47A	A1865	Psilocin and Psilocybin	Sch. I
47B		d-methamphetamine (Salt Form Not Determined)	Sch. I
		d-methamphetamine (Salt Form Not Determined)	Sch. I

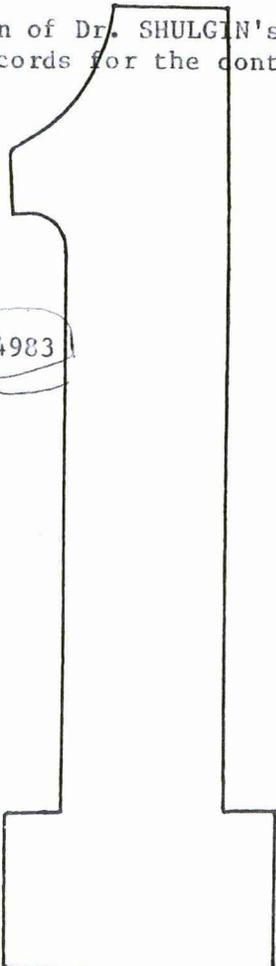
4. During the on-site investigation of Dr. SHULGIN's residence/laboratory, he failed to produce manufacturing or receipt records for the controlled substances noted above.

ATTACHMENTS:

1. DEA-7's
2. STRL Memos

INDEXING SECTION:

1. SHULGIN, Alexander - NADDIS: 294983



REPORT OF INVESTIGATION

Page 1 of 1

1. PROGRAM CODE	2. CROSS FILE <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	3. FILE NO. R3-93-2077	4. G-DEP IDENTIFIER (b)(7)(E)
5. BY: (b)(7)(C), (b)(7)(F) AT: Investigator San Francisco, CA		6. FILE TITLE (b)(7)(C)	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:		8. DATE PREPARED January 31, 1995	
9. OTHER OFFICERS:			
10. REPORT RE: Meeting with AUSA (b)(7)(C) (PM40)			

DETAILS:

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

2. AUSA (b)(7)(C) has stated that she is also interested in prosecuting Dr. Alexander SHULGIN (NADDIS: 294983) for violations of the CSA.

INDEXING SECTION:

1. (b)(7)(C)
2. SHULGIN, Alexander - NADDIS: 294983

11. DISTRIBUTION: REGION	12 (b)(7)(C), (b)(7)(F)	13. DATE 2/10/95
DISTRICT	14	15. DATE 2/13/95
OTHER AMRI, ODD		Supervisor

DEA Form (May 1980) - 6

(b)(7)(C)

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

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

REPORT OF INVESTIGATION

Page 1 of 1

1. PROGRAM CODE	2. CROSS FILE RELATED FILES	3. FILE NO. R3-93-2077	4. G-DEP IDENTIFIER (b)(7)(E)
5. BY: (b)(7)(C),(b)(7)(F) AT: Investigator San Francisco, CA	<input type="checkbox"/> R3-95-0024 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	6. FILE TITLE (b)(7)(C)	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:		8. DATE PREPARED January 31, 1995	
9. OTHER OFFICERS: TFA (b)(7)(C),(b)(7)(F)			
10. REPORT RE: Peyote Cactus Seized From Dr. SHULGIN's Residence Exhibits 1-6, Case #R3-95-0024 (RA40)			

DETAILS:

1. On October 27, 1994, during the service of an Administrative Inspection Warrant by the DEA SFFD Diversion Unit and Clan Lab Unit at Dr. SHULGIN's residence/laboratory, 1483 Shulgin Road, Lafayette, CA, TFA (b)(7)(C),(b)(7)(F) seized 6 peyote cactus, as drug exhibits 1-6 under case file R3-95-0024.

2. Reference is made to the attached copies of DEA-7's documenting the analysis of drug exhibits 1-6, case #R3-95-0024 identifying the six exhibits as peyote cactus.

ATTACHMENTS:

- 1. Copies of DEA-7's, Exhibits 1-6

INDEXING SECTION:

- 1. SHULGIN, Alexander - NADDIS: 294983

11. DISTRIBUTION: Chief Counsel REGION (b)(7)(C) DISTRICT OTHER AMRI, ODOD	1 (b)(7)(C),(b)(7)(F) 1	13. DATE 2/7/95 15. DATE 2/8/95
---	----------------------------	--

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

DEA SENSITIVE
DRUG ENFORCEMENT ADMINISTRATION

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

REPORT OF INVESTIGATION

Page 1 of 2

1. PROGRAM CODE		2. CROSS FILE		RELATED FILES	3. FILE NO. R3-93-2077	4. G-DEP IDENTIFIER (b)(7)(E)
5. BY: (b)(7)(C),(b)(7)(F) AT: Investigator San Francisco, CA		<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		AX	6. FILE TITLE (b)(7)(C)	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input checked="" type="checkbox"/> Action Requested By: Milwaukee R.O.					8. DATE PREPARED January 25, 1995	
9. OTHER OFFICERS:						
10. REPORT RE: Dr. SHULGIN purchase of 110gram of Precursor to Schedule I(2CB)(RA40)						

DETAILS:

1. On January 19, 1995, G/S (b)(7)(C) Milwaukee, WI Field Division contacted D/1 (b)(7)(C),(b)(7)(F) and reported a suspicious order of 2,5 Dimethoxyphenethylamine 97% by Alexander SHULGIN DBA Alexander Shulgin Research Inst., 1483 Shulgin Road, Lafayette, CA.

Acct. #	Order #	Drug	Qty Shipped	Date
93987	595214	2,5-Dimethoxyphenethylamine, 97%	1gm	01/27/93
	770368		100gm	06/04/93

2. On January 19, 1995, Investigator (b)(7)(C),(b)(7)(F) contacted STRL Chemist (b)(7)(C) who advised that 2,5 Dimethoxyphenethylamine is a precursor to schedule I 4-Bromo-2,5 Dimethoxyphenethylamine (2CB). (b)(7)(C) stated that 100 grams of 2,5 Dimethoxyphenethylamine could conservatively yield 80-90 grams of 2CB using Bromine and Acetic acid. Reference is made to DEA ROI dated November 3, 1994, same file number and title as this report, Re: Second Administrative Inspection Warrant (10/27/94), Alexander SHULGIN-Analytical Laboratory, DEA #PS0061616, Drug Exhibit #4. DEA STRL Lab identified Drug Exhibit #4 as 2,5 Dimethoxy-4-bromophenethylamine HCL (Schedule I 2CB). When exhibit #4 was taken from Dr. SHULGIN's lab on 01/27/94, Dr. Shulgin had 3.42 grams of (2CB) on hand that SHULGIN said he manufactured to research the effect of 2CB on receptor sites in rats and ultimately on humans for treating mental illness. Dr. SHULGIN stated that he synthesized approximately 10 grams of 2CB in the last two years. Dr. SHULGIN stated that he did not have records to document the manufacture of 2CB. It should be noted that Dr. SHULGIN had his DEA Schedule I research registration revoked by DEA in 1977.

3. Reference is made to Dr. SHULGIN's purchase log book that indicates the Aldrich purchase of 100 grams of 2,5 Dimethoxyphenethylamine noted in section 1 of this report. The log entry indicates "CALL from (b)(7)(C)" regarding Aldrich purchase for subject chemical. See attached copy of Dr. SHULGIN's purchase log book, attachment #2.

11. DISTRIBUTION:		13. DATE
REGION	Milwaukee R.O.	2/3/95
DISTRICT	(b)(7)(C),(b)(7)(F)	15. DATE
OTHER		2/6/95

DEA Form - 6 (May 1980) - 6
 AMRI, ODOD
 (b)(7)(C)

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

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

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
4. Page 2 of 2	6. DATE PREPARED January 25, 1995	
5. PROGRAM CODE		

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

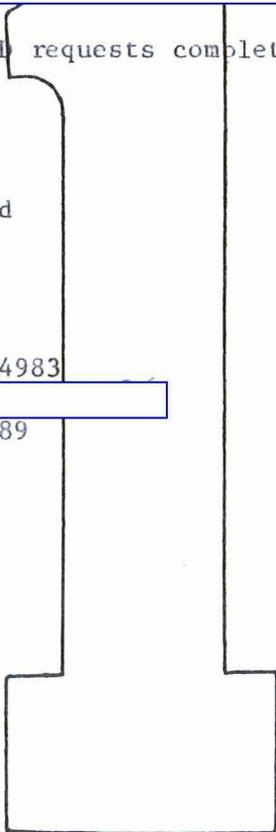
5. Based on the above, the DEA SFFD requests complete sales information from Aldrich by Dr. SHULGIN.

ATTACHMENTS:

- 1. Aldrich Chemical Purchase Record
- 2. Dr. Shulgin Logbook Entries

INDEXING SECTION:

- 1. A SHULGIN, Alexander - NADDIS: 294983
- 2. A (b)(7)(C)
- A-T Aldrich Chemical - NADDIS: 665089



REPORT OF INVESTIGATION

Page 1 of 2

1. PROGRAM CODE (b)(7)(C),(b)(7)(F)		2. CROSS FILE <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	3. FILE NO. R3-93-2077	4. G-DEP IDENTIFIER (b)(7)(E)
5. BY: Investigator AT: San Francisco, CA			6. FILE TITLE (b)(7)(C)	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:			8. DATE PREPARED January 24, 1995	
9. OTHER OFFICERS:				
10. REPORT RE: Results of STRL Analysis of Drug Exhibits resulting from Shulgin Warrants, Drug Exhibits 1-28 (RA40)				

DETAILS:

- Reference is made to the attached DEA-7's documenting the results of the DEA Special Testing Research Laboratory (STRL) Analysis of drug exhibits taken during the Warrants at Dr. Alexander SHULGIN's residence/laboratory.
- See attached DEA STRL memos summarizing drug analysis of drug exhibits 1-28.

<u>Exhibit #</u>	<u>Lab #</u>	<u>Active Ingredient</u>	<u>Drug Schedule</u>
1	A1819	2,5-dimethoxy-4-bromophenethylamine	Sch. I Analog
2	A1820	3,4-Methylenedioxyephedrone HCl	Sch. I Analog
3	A1821	3,4-Methylenedioxyamphetamine base	Sch. I
4	A1822	2,5-Dimethoxy-4-bromophenethylamine HCl	Sch. I
5	A1823	2-Methoxy-4,5-methylenedioxyamphetamine HCl	Sch. I Analog
6	A1824	3,4-Methylenedioxyamphetamine tartrate	Sch. I
7	A1825	N-Methyl-3,4-Methylenedioxyamphetamine HCl	Sch. I
8	A1826	3,4-Methylenedioxyamphetamine HCl	Sch. I
9	A1827	N-(2-Methoxyethyl)-3,4-methylene-dioxyamphetamine hydrochloride	Sch. I Analog
10a,b, d,f,g	A1828	3,4-Methylenedioxyamphetamine HCl	Sch. I
10c,e		2,5-Dimethoxy-4-bromophenethylamine HCl	Sch. I
11	A1829	NNDD	None
12	A1830	2,4-Methylenedioxyamphetamine HCl	Sch. I
13	A1831	3,4-Methylenedioxyamphetamine HCl	Sch. I
14	A1832	delta-9-Tetrahydrocannabinol	Sch. I
15	A1833	3,4-Methylenedioxyamphetamine Benzillate	Sch. I
16a	A1834	3,4-Methylenedioxyamphetamine HCl	Sch. I
16b		3,4-Methylenedioxyamphetamine HCl	Sch. I
17	A1835	2,5-Dimethoxy-4-bromophenethylamine	Sch. I

11. DISTRIBUTION Chief Counsel, REGION (b)(7)(C) DISTRICT OTHER AMRI, ODOD	(b)(7)(C),(b)(7)(F)	13. DATE 1/24/95
		16. DATE 1/24/95

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

DEA SENSITIVE
DRUG ENFORCEMENT ADMINISTRATION

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

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
4. Page 2 of 2	6. DATE PREPARED January 18, 1995	
5. PROGRAM CODE		

		(Salt Not Determined)	
18	A1836	Mescaline HCl	Sch. I
19	A1837	3,4-Methylenedioxyamphetamine HCl	Sch. I
20	A1838	Mescaline HCl	Sch. I
21	A1839	3,4-Methylenedioxymethamphetamine HCl	Sch. I
22	A1840	3,4-Methylenedioxyethylamphetamine HCl	Sch. I
23	A1841	Mescaline HCl	Sch. I
24	A1842	2,5-Dimethoxy-4-bromophenethylamine (Salt Not Determined)	Sch. I
25	A1843	3,4-Methylenedioxymethamphetamine HCl	Sch. I
26	A1844	Mescaline Sulfate	Sch. I
27	A1845	2,5-Dimethoxy-4-bromophenethylamine HCl	Sch. I
28	A1846	3,4-Methylenedioxymethamphetamine HCl	Sch. I

3. During the on-site investigation of Dr. SHULGIN, he failed to produce manufacturing or receipt records for drug exhibits I-28.

ATTACHMENTS:

1. DEA-7's
2. STRL Memos

INDEXING SECTION:

1. SHULGIN, Alexander - NADDIS: 294983

REPORT OF INVESTIGATION

Page 1 of 2

1. PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE NO. RB-93-2077	4. G-DEP IDENTIFIER (b)(7)(E)
5. BY: (b)(7)(C), (b)(7)(F) AT: Investigator San Francisco, CA	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		6. FILE TITLE (b)(7)(C)	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:			8. DATE PREPARED December 29, 1994	
9. OTHER OFFICERS:				

10. REPORT RE:

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

DETAILS:

1. On October 31, 1994, the DEA SFFD Diversion Unit terminated their Administrative Inspection of Alexander SHULGIN's DEA registered location: 1483 Shulgin Rd., Lafayette, CA, where SHULGIN maintains his residence and chemical laboratory, DEA registration PS0061616, Analytical Lab, Schedules I-V. At the end of the inspection, D/I (b)(7)(C), (b)(7)(F) asked Alexander SHULGIN if he would search through his residence and laboratory and inventory all controlled substances in his possession.

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

Drug	Schedule	Source (if known)	Approximate Weight
Amobarbital	C-II	(b)(7)(C)	14 g.
Amobarbital	C-II	Sigma	50 g.
a-Ethyltryptamine	C-I	Sigma	25 g.
Barbital	C-IV	?	2 g.
Chloral Hydrate	C-IV	Sigma	100 g.
Chloral Hydrate	C-IV	Mallinckrodt	400 g.
d5-Cocaine	C-II	(b)(7)(C)	trace
d5-Cocaine	C-II	(b)(7)(C)	trace
Hexobarbital	C-III?	?	2 g.
Meprobamate	C-IV	?	2 g.
Methcathinone	C-I	Sigma	1 g.
Methcathinone	C-I	ATS	900 mg.
Methoxexital	C-IV	(b)(7)(C)	500 mg.
Midazolam	C-IV	(b)(7)(C)	10 mg.
Midazolam	C-IV	(b)(7)(C)	10 mg.

11. DISTRIBUTION:	(b)(7)(C), (b)(7)(F)	13. DATE 12/29/94
REGION		15. DATE 1/3/95
DISTRICT		
OTHER AMRI, ODOD		

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

DEA SENSITIVE
DRUG ENFORCEMENT ADMINISTRATION

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

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
4. Page 2 of 2	6. DATE PREPARED November 31, 1994	
5. PROGRAM CODE		

Midazolam	C-IV	(b)(7)(C)	10 mg.
Pentobarbital	C-II	?	2 g.
Phenobarbital	C-IV	?	2 g.
Secobarbital	C-II	Sigma	25 g.
Secobarbital	C-II	?	2 g.
2C-B	C-I	ATS	3 g.
MMDA	C-I	(b)(7)(C)	100 mg.
MMDA-2	C-I	ATS	25 g.

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

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

ATTACHMENTS:

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

INDEXING SECTION:

- SHULGIN, Alexander - NADDIS: 294983

REPORT OF INVESTIGATION

Page 1 of 2

1. PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE NO. R3-93-2077	4. G-DEP IDENTIFIER (b)(7)(E)
5. BY: (b)(7)(C),(b)(7)(F) AT: Investigator San Francisco, CA	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	4x (b)(7)(C)	6. FILE TITLE (b)(7)(C)	(b)(7)(C)
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:			8. DATE PREPARED November 18, 1994	
9. OTHER OFFICERS:				
10. REPORT RE: Use of Internet Computer System by Dr. SHULGIN and others to communicate drug information and deliver drugs (RA40)				

DETAILS:

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

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

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

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

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

11. DISTRIBUTION: REGION DISTRICT OTHER ANRI, ODOJ	(b)(7)(C),(b)(7)(F)	13. DATE 12/13/94
		15. DATE 12/14/94

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

DEA SENSITIVE
DRUG ENFORCEMENT ADMINISTRATION

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

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
4. Page 2 of 2		
5. PROGRAM CODE	6. DATE PREPARED November 18, 1994	

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

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

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

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

ATTACHMENTS:

1. Excerpts from Internet

INDEXING SECTION:

1. SHULGIN, Alexander - NADDIS: 294983
2. (b)(7)(C)

REPORT OF INVESTIGATION

Page 1 of 3

1. PROGRAM CODE	2. CROSS FILE	3. FILE NO. R3-93-2077	4. G-DEP IDENTIFIER (b)(7)(E)
5. BY: (b)(7)(C),(b)(7)(F) Investigator AT: San Francisco, CA	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	6. FILE TITLE (b)(7)(C)	(b)(7)(C)
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:		8. DATE PREPARED November 14, 1994	
9. OTHER OFFICERS:			
10. REPORT RE: Request for Order to Show Cause (PIR) Alexander SHULGIN (Analytical Lab, DEA #PS0061616, Schedules I-V)			

SYNOPSIS:

The continued registration of Alexander SHULGIN (Analytical Lab, DEA #PS0061616, Schedules I-V, 1483 Shulgin Road, Lafayette, CA 94549) is inconsistent with the public interest as that term is used in 21 USC 823 and 824. 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 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 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. Alexander SHULGIN is also believed to be involved in illegal human drug testing. Chief Counsel Attorney (b)(7)(C) has been assigned to this Show Cause and requests that OD expedite its processing.

DETAILS:

1. The continued registration of Alexander SHULGIN (Analytical Lab, DEA #PS0061616, Schedules I-V, 1483 Shulgin Road, Lafayette, CA 94549), is inconsistent with the public interest as defined in 21 USC 823 and 824 based on the following:

A. On October 27, 1994, Alexander SHULGIN was found to be in illegal possession of Schedule I Peyote (drug code 7415), in violation of 21 USC 841(a)(1).

See attached DEA ROI, File #R3-95-0024, Title: Alexander SHULGIN, Dated: November 1, 1994 (see attachment #1). (b)(7)(C) Alexander SHULGIN, stated that the peyote was a gift from a member of the Native American Church. The Peyote was seized by TFA Agent (b)(7)(C),(b)(7)(F). A decision on prosecution is pending.

11. DISTRIBUTION Chief Counsel REGION (b)(7)(C) DISTRICT OTHER ARMI, ODOB	(b)(7)(C),(b)(7)(F)	13. DATE 11/21/94
		15. DATE 11/21/94

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

DEA SENSITIVE
DRUG ENFORCEMENT ADMINISTRATION

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

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
4. Page 2 of 3	6. DATE PREPARED November 14, 1994	
5. PROGRAM CODE		

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

During the DEA Inspections of Dr. SHULGIN's laboratory/residence, Dr. SHULGIN stated that he has conducted and was currently conducting research with Schedule I controlled substances and their analogs, specifically 2CB AKA Nexus, Methcathinone and MDMA. Dr. SHULGIN was researching these compounds for use in treating mental illness. See DEA ROI's file title (b)(7)(C), Case #R3-93-2077, Re: Administrative Inspections of Alexander SHULGIN (see attachment #2).

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

Alexander SHULGIN failed to maintain records documenting his manufacture of Schedule I 2CB-"Nexus", MDMA, LSD, MDA and MMDA-2. Alexander SHULGIN also failed to document samples of controlled substances he received from associates and anonymous individuals. See DEA ROI, Case #R3-93-2077 title (b)(7)(C), Re: Administrative Inspection Warrants, Alexander SHULGIN, (see attachment #2).

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

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

(b)(7)(C)

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

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

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

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

DEA SENSITIVE
DRUG ENFORCEMENT ADMINISTRATION
This report is the property of the Drug Enforcement Administration.
Neither it nor its contents may be disseminated outside the Agency to which loaned.

Previous edition may be used.

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
4. Page 3 of 3	6. DATE PREPARED November 14, 1994	
5. PROGRAM CODE		

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:

(b)(7)(C),(b)(7)(F)
DEA Diversion Investigator, SFFD
Phone: (b)(7)(C),(b)(7)(F)

(b)(7)(C)
DEA Chemist, STRL, McLean, VA
Phone: (b)(7)(C)

(b)(7)(C)
California Research Advisory Panel
Phone: (b)(7)(C)

(b)(7)(C)
California Research Advisory Panel
Phone: (b)(7)(C)

(b)(7)(C),(b)(7)(F)
DEA C/S S/A Clan Lab Group
Phone: (b)(7)(C),(b)(7)(F)

(b)(7)(C),(b)(7)(F)
S/A Clan Lab Group
Phone: (b)(7)(C),(b)(7)(F)

(b)(7)(C),(b)(7)(F)
TFA Agent
Phone: (b)(7)(C),(b)(7)(F)

3. Based on the information noted above, it is recommended that this matter be forwarded to Chief Counsel for a request for an Order to Show Cause against DEA Number PS0061616 issued to Alexander SHULGIN. The continued registration of Dr. SHULGIN is not in the public interest per Title 21 USC 824(a)(4).

ATTACHMENTS:

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

INDEXING SECTION:

1. SHULGIN, Alexander - NADDIS: 294983
2. (b)(7)(C)

REPORT OF INVESTIGATION

Page 1 of 6

1. PROGRAM CODE	2. CROSS FILE	3. FILE NO. R3-93-2077	4. G. DEP IDENTIFIER (b)(7)(E)
5. BY: (b)(7)(C), (b)(7)(F) AT: Investigator San Francisco, CA	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	6. FILE TITLE (b)(7)(C)	(b)(7)(C)
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:		8. DATE PREPARED November 10, 1994	
9. OTHER OFFICERS: S/A (b)(7)(C), (b)(7)(F)			
10. REPORT RE: Continuation of Second Administrative Inspection Warrant, Alexander SHULGIN, Analytical Laboratory, 10/31/94, Drug Exhibits 17-47 (RA40)			

SYNOPSIS:

This report documents the continuation and termination on 10/31/94 of the second Administrative Inspection Warrant initiated on 10/27/94 of Alexander SHULGIN, Analytical Lab, DEA #PS0061616, Schedules I-V, 1483 Shulgin Road, Lafayette, CA 94549. On September 27, 1994, October 27, 1994 and October 31, 1994, the DEA executed Administrative Inspections of Alexander SHULGIN's laboratory/residence based on his public statements regarding research in Hallucinogens (High Times Article August 94) and a review of Dr. SHULGIN's violative history with the DEA. The inspections and subsequent investigations reveal that SHULGIN is conducting unauthorized Schedule I research and failed to maintain controlled substances receipt, manufacturing and destruction records. On the October 27, 1994 inspection by the DEA, Alexander SHULGIN was found to be in illegal possession of Schedule I Peyote plants. This report documents the collection and surrender of samples of suspect controlled substances Dr. SHULGIN received in the mail. Dr. SHULGIN failed to keep records on these substances. The processed drug exhibits were mailed to DEA STRL for analysis.

DETAILS:

- Reference is made to DEA ROI same file number and title as this report dated November 3, 1994, re: Second Administrative Inspection Warrant, Alexander SHULGIN, Analytical Laboratory, 10/27/94.
- This report documents the continuation and termination on 10/31/94 of the second Administrative Inspection Warrant initiated on 10/27/94 of Alexander SHULGIN, Analytical Lab, DEA #PS0061616, Schedules I-V, 1483 Shulgin Road, Lafayette, CA 94549.

11. DISTRIBUTION: REGION <i>OPR/EA</i> (b)(7)(C) DISTRICT OTHER <i>AMRI, ODOD</i>	(b)(7)(C), (b)(7)(F)	13. DATE <i>11/18/94</i>
		15. DATE <i>11/21/94</i>

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

DEA SENSITIVE
 DRUG ENFORCEMENT ADMINISTRATION

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

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
	4. Page 2 of 6	
5. PROGRAM CODE	6. DATE PREPARED November 10, 1994	

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

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

Exhibits 17-47

EXHIBIT #17 (22212)

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

EXHIBIT #18 (22226)

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

EXHIBIT #19 (22219)

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

EXHIBIT #20 (22214)

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

EXHIBIT #21 (22218)

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

REPORT OF INVESTIGATION (Continuation)	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
	4. Page 3 of 6	
5. PROGRAM CODE	6. DATE PREPARED November 10, 1994	

EXHIBIT #22 (22209)

Vial containing a couple of milligrams of a grey solid - labelled (b)(7)(C) no memory of what or from where - not analyzed.

EXHIBIT #23 (22228)

Blue-line ziplock several chunks of hard white crystals label "synthetic hydrochloride "Rock" no idea who or where.

EXHIBIT #24 (22211)

ML's from an old 2C-B synthesis. My writing- sample from lab for IR. Probably contains 2C-B.

EXHIBIT #25 (22207)

"456 mg Loo 08/15/86" white solid - no memory of from where - no idea of Loo in person or sheet name - not analyzed.

EXHIBIT #26 (22213)

Square paper envelop 5cm x 5cm labelled "Mesc #3" contains wax paper containing highly crystalline solids (white). Not analyzed. Suspect mescaline. Wrappers discarded. 10mg.

EXHIBIT #27 (22210)

Vial labelled "Nexus ex Frasila" (or Franila) - Origin unknown - not analyzed.

EXHIBIT #28 (22220)

Envelope labelled "MDM Clone MDE? MDOH?" Containing an AL wrapper 3x3cm (discarded) containing 100mg brown sticky solids. Not analyzed. No hint of identity. From whom?

EXHIBIT #29 (22208)

Plastic egg (discarded) containing a Al foil (discard) containing a microscopic purple (?) tablet - not analyzed.

EXHIBIT #30 (22230)

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
	4. Page 4 of 6	
5. PROGRAM CODE	6. DATE PREPARED November 10, 1994	

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

EXHIBIT #31 (22223)

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

EXHIBIT #32 (22224)

Sealed 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 "S Mesc S04" 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 waxcd 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 - 6a (b)(7)(C)

DEA SENSITIVE
DRUG ENFORCEMENT ADMINISTRATION
This report is the property of the Drug Enforcement Administration.
Neither it nor its contents may be disseminated outside the Agency to which loaned.

Previous edition may be used.

REPORT OF INVESTIGATION (Continuation)	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
4. Page 5 of 6	6. DATE PREPARED November 10, 1994	
5. PROGRAM CODE		

EXHIBIT #38 (22225)

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

EXHIBIT #39 (22205)

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

EXHIBIT #40 (22217)

As above - white paper envelope labelled "G MDA 804". (5x5cm) containing wax paper (discarded) containing 150mg off white granular solids.

EXHIBIT #41 (22201)

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

EXHIBIT #42 (22203)

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

EXHIBIT #43 (22202)

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

EXHIBIT #44 (22204)

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

EXHIBIT #45 (22221)

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

EXHIBIT #46 (22231)

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

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

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

Previous edition may be used.

REPORT OF INVESTIGATION (Continuation)	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
	4. Page 6 of 6	
5. PROGRAM CODE	6. DATE PREPARED November 10, 1994	

Small cardboard box, transparent top, found in mail box on 08/23 - forgot to record the year (a few years ago?) From Hawaii - maybe (b)(7)(C) Not analyzed.

EXHIBIT #47 (22206)

Sample received from VA Hospital, SF - probably a drug taken from a VA patient - three plastic bags - one with a powder. Not analyzed. Labelled "sample of unknown drug for Dr. (b)(7)(C)".

Chain of Custody:

On October 31, 1994, the drug exhibits 17-47 were surrendered by Dr. SHULGIN at his residence to D/I (b)(7)(C),(b)(7)(F) (see attached DEA-12, Receipt for Cash or other items, attachment #2). D/I (b)(7)(C),(b)(7)(F) transported the exhibits to DEA SFFD for safekeeping. On November 1, 1994, the exhibits were processed by D/I (b)(7)(C),(b)(7)(F) (see attached DEA-7's, Attachment #3). On November 3, 1994, D/I (b)(7)(C),(b)(7)(F) mailed drugs exhibits 17-47 to DEA Special Testing Laboratory McLean, VA for analysis.

5. It should be noted that on the October 27, 1994, DEA Inspection, Dr. SHULGIN stated to DEA S/A (b)(7)(C),(b)(7)(F) and Chemist (b)(7)(C) that he did know who sent him some of the suspect 2CB samples but did not want to identify the individuals because he did not want to get them into trouble. SHULGIN stated that some of the samples sent to him were mailed by individuals he communicates with via the INTERNET Computer System. Alexander SHULGIN failed to maintain controlled substance receipt records on samples he received as required by 21 CFR 1304.27 in violation of 21 USC 842(a)(5).

6. After collecting the exhibits noted in this report, D/I (b)(7)(C),(b)(7)(F) and S/A (b)(7)(C),(b)(7)(F) exited SHULGIN's residence at approximately 1:00p.m., thus terminating the Administrative Inspection. The Warrant was returned to the Court on November 4, 1994.

ATTACHMENTS:

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

INDEXING SECTION:

1. SHULGIN, Alexander -- NADDIS: 294983

REPORT OF INVESTIGATION

Page 1 of 3

1. PROGRAM CODE		2. CROSS FILE		3. FILE NO. R3-93-2077	4. G-DEP IDENTIFIER (b)(7)(E)
5. BY: (b)(7)(C),(b)(7)(F) AT: Investigator San Francisco, CA		<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		6. FILE TITLE (b)(7)(C)	(b)(7)(C)
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:				8. DATE PREPARED November 3, 1994	
9. OTHER OFFICERS: S/A (b)(7)(C),(b)(7)(F); S/A (b)(7)(C),(b)(7)(F); S/A (b)(7)(C),(b)(7)(F)					
10. REPORT RE: Administrative Inspection Warrant on 09/27/94, of Alexander SHULGIN, Analytical Laboratory, DEA Number PS0061616, Drug Exhibits 10-16 (RA40)					

SYNOPSIS:

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

DETAILS:

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

Alexander T. SHULGIN
Analytical Lab, Drug Schedule I-V
DEA Registration PS0061616
1483 Shulgin Road
Lafayette, CA 94549 (Dr. SHULGIN's residence)

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

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

11. DISTRIBUTION: OPR (b)(7)(C)		13. DATE 11/18/94	
REGION		15. DATE 11/21/94	
DISTRICT		rvisor	
OTHER AMRI, ODOD			

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

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

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

REPORT OF INVESTIGATION (Continuation)	1. FILE NO. R3-93-207	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
4. Page 2 of 3	6. DATE PREPARED November 3, 1994	
5. PROGRAM CODE		

SHULGIN led the Investigators to his library/computer room. This area was cluttered with books, papers and file cabinets. In the center of the room there was a computer terminal and desk. Upon entering the room, D/I (b)(7)(C), (b)(7)(F) observed two drinking glasses containing various glass vials containing powder or liquid located in plain view on top of a file cabinet. D/I (b)(7)(C), (b)(7)(F) observed one clear glass vial with white top containing powder labeled (b)(7)(C) sample N-Anhydroxy MDMA? D/I (b)(7)(C), (b)(7)(F) also observed the following items on top of the file cabinet; three plastic baggies containing powder marked 5-28-91 AD/9-18-91-AD/ 5-28-91-AD, and one commercial package containing Schedule II Marinol capsules. Investigator (b)(7)(C), (b)(7)(F) asked Dr. SHULGIN if the items on top of the cabinet were controlled substances, SHULGIN stated that the items were old and that he was not sure what they were. D/I (b)(7)(C), (b)(7)(F) asked Dr. SHULGIN if he had records on the items on top of the cabinet. (b)(7)(C), (b)(7)(F) SHULGIN replied "no". D/I (b)(7)(C), (b)(7)(F) referred to a glass test tube containing tan powder marked (b)(7)(C) sample N-hydroxy MDMA". D/I (b)(7)(C), (b)(7)(F) asked who (b)(7)(C) was. Dr. SHULGIN replied, (b)(7)(C). D/I (b)(7)(C), (b)(7)(F) asked Dr. SHULGIN, "(b)(7)(C) from our lab"? Dr. SHULGIN responded "yes", then stated, "I don't want to get him in trouble, that's not (b)(7)(C), I don't know who (b)(7)(C) is". D/I (b)(7)(C), (b)(7)(F) then asked S/A (b)(7)(C), (b)(7)(F) to take a closer look at the test tube marked (b)(7)(C) sample N-Anhydroxy MDMA". D/I (b)(7)(C), (b)(7)(F) then asked Dr. SHULGIN what the liquid was in one of the other vials. Dr. SHULGIN stated that he believed it was a Homolog of LSD. D/I (b)(7)(C), (b)(7)(F) then set the items on white paper for photography. D/I (b)(7)(C), (b)(7)(F) then asked Dr. SHULGIN to write next to each item what he thought it was. Next to the vial marked (b)(7)(C) sample, Dr. SHULGIN wrote, (b)(7)(C) who?" (see attachment #3). D/I (b)(7)(C), (b)(7)(F) collected the suspect drugs and gave Dr. SHULGIN a DEA-12 (see attachment #4).

- Exhibit #10 - White powder contained in seven glass vials.
- Exhibit #11 - Yellow liquid contained in three glass vials.
- Exhibit #12 - Tan powder contained in three plastic baggies.
- Exhibit #13 - Tan powder contained in glass vial marked "(b)(7)(C) sample N-Hydroxy MDMA".
- Exhibit #14 - Tablets contained in box.
- Exhibit #15 - Tan powder in clear baggies.
- Exhibit #16 - Tan powder and tablet contained in glassine baggie.

Custody of Evidence:

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

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

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

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

Previous edition may be used.

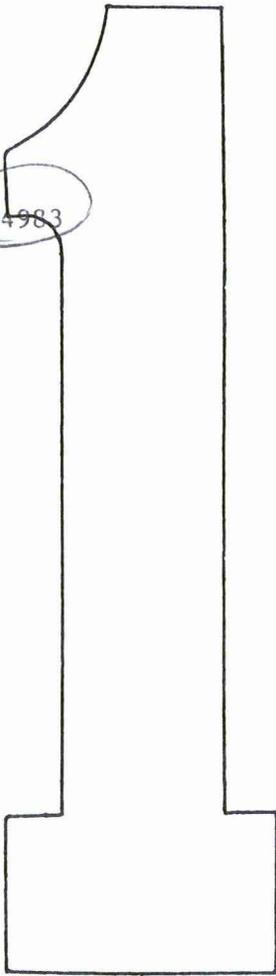
REPORT OF INVESTIGATION <i>(Continuation)</i>	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
4. Page 3 of 3	6. DATE PREPARED November 3, 1994	
5. PROGRAM CODE		

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



REPORT OF INVESTIGATION

Page 1 of 6

1. PROGRAM CODE	2. CROSS FILE <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	3. FILE NO. R3-93-2077	4. G-DEP IDENTIFIER (b)(7)(E)
5. BY (b)(7)(C),(b)(7)(F) AT: Investigator San Francisco, CA	X	6. FILE TITLE (b)(7)(C)	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:		8. DATE PREPARED November 3, 1994	
9. OTHER OFFICERS: G/S S/A (b)(7)(C),(b)(7)(F) S/A's (b)(7)(C),(b)(7)(F) TFA (b)(7)(C),(b)(7)(F) DEA Chemist (b)(7)(C), BNE S/A (b)(7)(C),(b)(7)(F) Contra Costa DA Inv. (b)(7)(C),(b)(7)(F)			
10. REPORT RE: Second Administrative Inspection Warrant (10/27/94), Alexander SHULGIN Analytical Laboratory, DEA #PS0061616 (RA40) (Drug Ex. 1 Through 9)			

SYNOPSIS:

This report documents the Administrative Inspection of the registration of Alexander SHULGIN, Analytical Lab, DEA #PS0061616, Schedules I-V, 1483 Shulgin Road, Lafayette, CA 94549, on October 27, 1994. On September 27, 1994, October 27, 1994 and continuing on October 31, 1994, the DEA executed Administrative Inspections of Alexander SHULGIN's laboratory/residence based on his public statements regarding research with Hallucinogens (High Times Article August 94) and a review of Dr. SHULGIN's violative history with the DEA. The DEA inspections and subsequent investigations revealed that SHULGIN is conducting unauthorized Schedule I research and failed to maintain controlled substances receipt, manufacturing and destruction records. On the October 27, 1994 inspection by the DEA, Alexander SHULGIN was found to be in illegal possession of Schedule I Peyote plants. The DEA SFFD also participated in a State Criminal Search Warrant of Dr. SHULGIN's residence on October 27, 1994 involving possible environmental violations, this investigation is ongoing. Alexander SHULGIN is also believed to be involved in illegal human drug testing. DEA Chemist (b)(7)(C), Special Testing Laboratory, participated in the execution of the warrant and assisted in the collection of samples subsequently sent to the DEA STRL for analysis.

DETAILS:

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

Alexander T. SHULGIN
Analytical Lab, Drug Schedules I-V
DEA Registration PS0061616
1483 Shulgin Road
Lafayette, CA 94549 (Dr. SHULGIN's residence)

11. DISTRIBUTION OPR LA (b)(7)(C) REGION DISTRICT OTHER AMRI, ODOJ (b)(7)(C)	(b)(7)(C),(b)(7)(F)	13. DATE 4/18/94
		15. DATE 11/21/94

DEA Form - 6 (May 1980)

DEA SENSITIVE
DRUG ENFORCEMENT ADMINISTRATION

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

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

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), (b)(7)(F) 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 (b)(7)(C), (b)(7)(F) asked Dr. SHULGIN to identify the controlled substances he had on hand in his lab. Dr. SHULGIN identified Schedule I 2CB "Nexus", MDMA2, MDA and Methcathinone. On October 15, 1993, DEA converted Methcathinone from emergency Schedule to permanent Schedule I. Chemist (b)(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

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

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

Exhibit #2 - Methylene Dioxy Methcathinone - Schedule I analog - 8 grams (on hand)

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

Exhibit #3 - MDMA - Schedule I

Dr. SHULGIN identified this vial as containing 2ml of a yellow liquid base of MDMA that he made in the last year to study its decomposure to light because he had heard reports that a black "goo" was being found at Clan Lab sites. He was attempting to determine if MDMA turns black when exposed to light. STRL Chemist (b)(7)(C) asked Dr. SHULGIN why his production of MDMA or Hydroxy MDMA was not considered research. Dr. SHULGIN responded, "It could be, its more for analytical needs. What are the black residues? I admit when you get into the area of going from the Iode or Bromide compound or into other things you are into chemical research if it happens to go through a intermediate of a Scheduled drug. Its a semantic argument, your side has merit". Dr. SHULGIN voluntarily surrendered the vial.

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

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

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

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

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

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

Previous edition may be used.

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
4. Page 4 of 6	6. DATE PREPARED November 3, 1994	
5. PROGRAM CODE		

(b)(7)(C) have the authority to conduct human drug testing. Alexander SHULGIN stated that this patent information has been submitted to (b)(7)(C), Patent Attorney, Neurobiological Technologies Inc., 1440 Regatta Blvd., Richmond, CA 94804 (Phone: (b)(7)(C))

(b)(7)(C)

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

Dr. SHULGIN has not obtained IND's for his drug research.

Exhibit #5 - MDMA -2 Schedule I MDMA - 20.7grams (on hand)

Dr. SHULGIN stated that he made 10 grams of this item for NIDA 10-15 years ago. He had no records to document its manufacture. SHULGIN stated that he has personally ingested MDMA-2 and stated that it has a mild hallucinogenic effect. A sample was taken for analysis.

Exhibit #6 - MDA - Schedule I - Three glass vials marked MDA Tartrate

Dr. SHULGIN had no record of manufacture on these items. Dr. SHULGIN voluntarily surrendered these items because he said he had no use for them. He thought he manufactured and analyzed these items to look at isomers. Three bottles surrendered.

Exhibit #7 - MDMA - Schedule I - 1 vial containing liquid

Dr. SHULGIN had no record of receipt or manufacture on this item found in his lab refrigerator and voluntarily surrendered it.

Exhibit #8 - MDA - Schedule I

one vial marked MDA - Dr. SHULGIN had no records on it

Exhibit #9 - unknown white powder in vial

Dr. SHULGIN thought it might be MDA

The information above indicates that Alexander SHULGIN is conducting Schedule I research not authorized by his analytical lab registration in violation of 21 CFR 1301.22(b)(3) and failed to maintain controlled substance manufacture records as required by 1304.27 in violation of 21 USC 342(a)(5).

Chain of Custody:

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

DEA SENSITIVE
DRUG ENFORCEMENT ADMINISTRATION
This report is the property of the Drug Enforcement Administration.
Neither it nor its contents may be disseminated outside the Agency to which loaned.

Previous edition may be used.

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

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

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

(b)(7)(C)

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

11. Upon exiting Dr. SHULGIN's residence Contra Costa County Sheriffs' Officer (b)(7)(C),(b)(7)(F) noticed, in plain view, six potted peyote plants on Dr. SHULGIN's patio. (b)(7)(C),(b)(7)(F)

(b)(7)(C)

The peyote plants were seized by TFA

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

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

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

Previous edition may be used.

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

(b)(7)(C),(b)(7)(F) (see DEA R01 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
2. 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
9. (b)(7)(C)
10. Peyote Photos

INDEXING SECTION:

1. SHULGIN, Alexander - NADDIS: 294983
2. (b)(7)(C)

REPORT OF INVESTIGATION

1. PROGRAM CODE	2. CROSS FILE RELATED FILES	3. FILE NO. R3-93-2077	4. G-DEP IDENTIFIER (b)(7)(E)
5. BY: (b)(7)(C),(b)(7)(F) AT: Investigator San Francisco, CA	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	6. FILE TITLE (b)(7)(C)	(b)(7)(C)
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:		8. DATE PREPARED September 30, 1994	
9. OTHER OFFICERS: S/A's (b)(7)(C),(b)(7)(F)			
10. REPORT RE: Administrative Inspection Warrant of Alexander SHULGIN, Analytical Laboratory DEA Number PS0061616 (RA40)			

SYNOPSIS:

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

DETAILS:

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

Alexander T. SHULGIN
Analytical Lab, Drug Schedules I-V
DEA Registration PS0061616
1483 Shulgin Road
Lafayette, CA 94549 (Dr. SHULGIN'S residence)

2. On September 27, 1994 at approximately 1:15pm, D/I (b)(7)(C),(b)(7)(F) S/A (b)(7)(C),(b)(7)(F) and S/A (b)(7)(C),(b)(7)(F) arrived at the residence of Dr. Alexander SHULGIN, 1483 Shulgin Road, Lafayette, CA 94549 where Dr. SHULGIN is registered with the DEA as an Analytical Laboratory. D/I (b)(7)(C),(b)(7)(F) and S/A's (b)(7)(C),(b)(7)(F) identified themselves to Dr. SHULGIN. Dr. SHULGIN invited the Investigators into his kitchen. D/I (b)(7)(C),(b)(7)(F) handed Dr. SHULGIN a copy of the Administrative Inspection Warrant noted in section one of this report. D/I (b)(7)(C),(b)(7)(F) explained to Dr. SHULGIN the purpose of the inspection. Dr. SHULGIN stated that he would assist the Investigators and further advised that he and his wife were leaving for Spain the following day, 09/28/94. During this discussion, Dr. SHULGIN introduced his wife (b)(7)(C)

11. DISTRIBUTION: REGION DISTRICT OTHER ANRI, ODOB (b)(7)(C)	(b)(7)(C),(b)(7)(F)	13. DATE 10/24/94 15. DATE 10/25/94
--	---------------------	--

DEA Form - 6
(May 1980)

DEA SENSITIVE
DRUG ENFORCEMENT ADMINISTRATION

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

REPORT OF INVESTIGATION (Continuation)	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER
	3. FILE TITLE (b)(7)(C)	
4. Page 2 of 8	6. DATE PREPARED September 30, 1994	
5. PROGRAM CODE		

3. Dr. SHULGIN's Laboratory:

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

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

<u>Controlled Substance</u>	<u>Schedule</u>	<u>Quantity</u>
2C-B	I	3.42 grams
Methcathinone	I	.9 grams

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

2C-B aka "Nexus" - Schedule I

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

Methcathinone - Schedule I

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

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

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

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

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

Previous edition may be used.

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER
	3. FILE TITLE (b)(7)(C)	
4. Page 3 of 8	6. DATE PREPARED September 30, 1994	
5. PROGRAM CODE		

CSA: (b)(7)(C)
Purdue University Pharmacy Bldg.
School of Pharmacy and Pharmacology
Department of Medicinal and Chemical Pharmacology
West Lafayette, IN 47907
DEA (b)(7)(C) exp. 10/31/95

NADDIS: (b)(7)(C)
(b)(7)(C)
Purdue University Pharmacy, Bldg. 410B
West Lafayette, IN

(b)(7)(C)
Neurobiological Technologies, Inc. (NTI)
1440 Regatta Blvd.
Richmond, CA 94804 (CSA, NADDIS: Negative)

(b)(7)(C)
Phone (b)(7)(C)
(CSA, (b)(7)(C))

Dr. SHULGIN stated that he and (b)(7)(C) are conducting most of their research for NTI in hopes of getting patents and IND'S. Investigator (b)(7)(C),(b)(7)(F) asked Dr. SHULGIN if he had receipt or manufacturing records for the 2CB or Methcathinone. Dr. SHULGIN stated that he and (b)(7)(C) synthesized the methcathinone and 2CB and that he and (b)(7)(C) maintain separate green colored ledgers documenting what they research. Dr. SHULGIN stated that the ledgers contain material that he and (b)(7)(C) expected to patent and was concerned that the material remain confidential. Dr. SHULGIN stated that the Investigators could return any time and review his records. The green ledgers were not reviewed by the Investigators. Dr. SHULGIN had no inventories on controlled substances or analogues in his laboratory. When Investigator (b)(7)(C),(b)(7)(F) asked if the ledgers contained controlled substance "manufacturing" records, Dr. SHULGIN responded, "That's a lopsided and loaded term, I prefer to use synthesized."

Ephedrine Reduction:

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

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER
	3. FILE TITLE (b)(7)(C)	
4. Page 4 of 8	6. DATE PREPARED September 30, 1994	
5. PROGRAM CODE		

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 (b)(7)(C),(b)(7)(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 (b)(7)(C),(b)(7)(F) to a hole in the ground located approximately fifteen feet from the door of the laboratory. Dr. SHULGIN identified the hole as an "old sump hole". Dr. SHULGIN stated that he took his nuclear waste to the Lawrence Lab in Berkeley.

6. Magic Stockroom:

After exiting the laboratory, Dr. SHULGIN showed the DEA Investigators a storage shed he described as his "Magic Stockroom", located next to Dr. SHULGIN's laboratory. The "Magic Stockroom" is an aluminum shed measuring approximately 15 x 20 feet. Dr. SHULGIN stated that this was where he has stored his chemicals over the years and that the shed also contains chemicals he has accepted from other laboratories who do not have the authority to destroy certain chemicals. Investigator (b)(7)(C),(b)(7)(F) entered the shed and noted numerous cans and bottles of chemicals including Acetone. Dr. SHULGIN stated there was cyclohexaline, methanol and inorganics in the shed. Dr. SHULGIN stated that the shed was probably full of precursor and essential chemicals. There was also a box of bottled Acetone located outside the shed. Dr. SHULGIN stated that the only controlled substance in the stockroom was Schedule IV chloral hydrate. Dr. SHULGIN showed Investigator (b)(7)(C),(b)(7)(F) 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.

REPORT OF INVESTIGATION (Continuation)	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER
	3. FILE TITLE (b)(7)(C)	
4. Page 5 of 8	6. DATE PREPARED September 30, 1994	
5. PROGRAM CODE		

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, Phendimetrazine Tartrate, Acetal Mescaline, Hydrocodone bitrtrate, Psilocybin, STP, LSD.

8. Receipt Records:

Investigator (b)(7)(C), (b)(7)(F) 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.

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

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

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

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

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

Previous edition may be used.

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER
	3. FILE TITLE (b)(7)(C)	
4. Page 7 of 8	6. DATE PREPARED September 30, 1994	
5. PROGRAM CODE		

Adjacent to the library/computer room is a room Dr. SHULGIN described as "Basement #4." This room appeared to be a storage room that contained various machines that Dr. SHULGIN described as diagnostic equipment. In the center of the room was a table on which there was a balance scale and what Dr. SHULGIN described as an infra-red spectrophotometer. Scattered around this area were items that Dr. SHULGIN described as samples that are given to him by friends or are mailed in from friends, associates and anonymous individuals for analysis. Dr. SHULGIN stated that some of the items he receives are controlled substances and some are not. Investigator (b)(7)(C), (b)(7)(F) asked Dr. SHULGIN if he had any records documenting samples he received. Dr. SHULGIN stated that at one time he maintained a log book documenting samples he received for analysis but that he stopped the documentation a few years ago. Investigator (b)(7)(C), (b)(7)(F) seized two items from basement #4, a letter with a pill attached and baggie containing powder with the word Oscarick written on it. Dr. SHULGIN stated he had no idea what the items on the table were except for 4 clear glass vials with black tops marked either "Nexus" or "Nexus Mother Liquor" that contained either powder or liquid (see photo attachment #12). Dr. SHULGIN identified these items as Schedule I "Nexus" (2CB) and the mother liquor of (2CB). Dr. SHULGIN stated that he synthesized the 2CB chemicals but he did not have any documentation of their manufacture.

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

ATTACHMENTS:

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

INDEXING SECTION:

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

DEA SENSITIVE

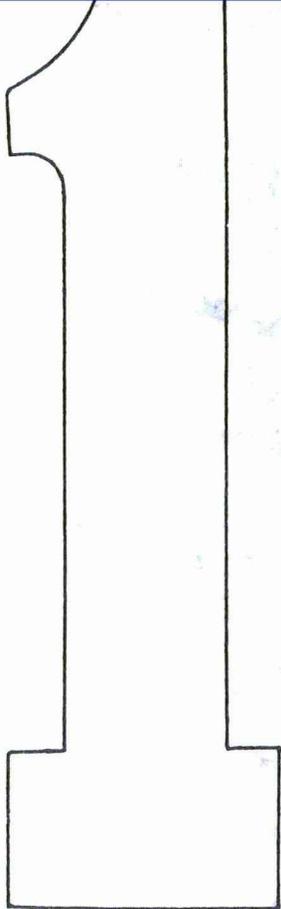
DRUG ENFORCEMENT ADMINISTRATION

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

Previous edition may be used.

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER
	3. FILE TITLE (b)(7)(C)	
4. Page 8 of 8	6. DATE PREPARED September 30, 1994	
5. PROGRAM CODE		

1. ASHULGIN, Alexander - NADDIS: 294983 (b)(7)(C)
(b)(7)(C)



REPORT OF INVESTIGATION

Page 1 of 1

1. PROGRAM CODE	2. CROSS FILE RELATED FILES	3. FILE NO. R3-93-2077	4. G-DEP IDENTIFIER (b)(7)(E)
5. BY: (b)(7)(C),(b)(7)(F) AT: Investigator San Francisco, CA	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	6. FILE TITLE (b)(7)(C)	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:		8. DATE PREPARED September 9, 1994	
9. OTHER OFFICERS:			
10. REPORT RE: Meeting with AUSA (b)(7)(C) (PM40)			

DETAILS:

1. On September 9, 1994, Investigator (b)(7)(C), (b)(7)(F) met with AUSA (b)(7)(C) to discuss the (b)(7)(C) the Administrative Inspection of Dr. Alexander SHULGIN's DEA registered location.

INDEXING SECTION:

(b)(7)(C)
2. SHULGIN, Alexander -- NADDIS: 294983

11. DISTRIBUTION: REGION DISTRICT OTHER AMRI, ODOB	(b)(7)(C),(b)(7)(F)	13. DATE 9/20/94
		15. DATE 9/20/94

DEA Form 6 (May 1980)

(b)(7)(C)

DEA SENSITIVE
DRUG ENFORCEMENT ADMINISTRATION

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

REPORT OF INVESTIGATION

Page 1 of 1

1. PROGRAM CODE (b)(7)(C), (b)(7)(F)	2. CROSS FILE <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	3. FILE NO. R3-93-2077	4. G-DEP IDENTIFIER (b)(7)(E)
5. BY: Investigator AT: San Francisco, CA	RELATED FILES AX	6. FILE TITLE (b)(7)(C) (b)(7)(C)	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:		8. DATE PREPARED August 23, 1994	
9. OTHER OFFICERS:			
10. REPORT RE: Meeting with AUSA Re: Chemist Alexander SHULGIN (PM40)			

DETAILS:

1. On August 23, 1994, Investigator (b)(7)(C), (b)(7)(F) gave AUSA (b)(7)(C) a draft copy of an Administrative Inspection Warrant and Supporting Affidavit regarding the proposed DEA Inspection of Dr. Alexander SHULGIN's DEA Registered location: 1483 Shulgin Road, Lafayette, CA 94549, where he is registered with the DEA as an Analytical Laboratory, DEA Registration PS0061616.

ATTACHMENTS:

1. Draft of Inspection Warrant and Supporting Affidavit

INDEXING SECTION:

AX SHULGIN, Alexander - NADDIS: 294983

11. DISTRIBUTION:

REGION

DISTRICT

OTHER AMRI, ODOD

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

13. DATE

8/23/94

15. DATE

8/23/94

rvisor

DEA Form - 6
(May 1980)

(b)(7)(C)

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

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

REPORT OF INVESTIGATION

1. PROGRAM CODE	2. CROSS FILE <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	RELATED FILES	3. FILE NO. R3-93-2077	4. G-DEP IDENTIFIER (b)(7)(E)
5. BY: (b)(7)(C),(b)(7)(F) AT: Investigator San Francisco, CA			6. FILE TITLE (b)(7)(C)	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:			8. DATE PREPARED July 20, 1994	
9. OTHER OFFICERS:				
10. REPORT RE: Dr. SHULGIN, Schedule I Research "PIHKAL" (CH50)				

DETAILS:

1. Reference is made to the attached index of 179 Phenethylamines noted on pages 453-457 of Dr. SHULGIN's book "PIHKAL" (see attached copy of list). In his book, s'PIHKAL", Dr. SHULGIN provides the synthesis (recipe) for 179 Phenethylamines and Dr. SHULGIN's personal comments on human experimentation with each analogue. Dr. SHULGIN does not have the authority to conduct drug experiments with humans. Dr. SHULGIN is registered as an Analytical Lab Schedules I-V.

2. Investigator (b)(7)(C),(b)(7)(F) requested that (b)(7)(C) DEA/ODE review the Phenethylamine list noted in section 1 of this report and determine if the drugs listed were controlled substances.

3. On July 15, 1994, (b)(7)(C) DEA/ODE faxed a list of controlled substances noted in Dr. SHULGIN's phenethylamine list noted in section 1. (b)(7)(C) identified the drugs noted below as controlled substances.

The following are controlled in the CSA under hallucinogens:

- #18 4BR 3,5-DMA
- #20 4BR 2,5-Dimethoxy PEA
- #53 2,4-DMA
- #54 2,5-DMA
- #55 3,4-DMA
- #62 4BR 2,5-DMA
- #66 4-ethyl-2,5-DMA
- #68 3-methyl-2,5-DMA
- #69 4-methyl-2,6-DMA
- #100 3,4-MDA
- #106 MDE
- #109 MDMA

11. DISTRIBUTION: REGION DISTRICT OTHER ANRI, ODOD	(b)(7)(C),(b)(7)(F)	13. DATE 7/26/94
		15. DATE 7/29/94

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

DEA SENSITIVE
DRUG ENFORCEMENT ADMINISTRATION

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

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
4. Page 2 of 2	6. DATE PREPARED July 20, 1994	
5. PROGRAM CODE		

#124	Meta	DOB
#157	TMA	3,4,5-TMA
#158	TMA-2	2,4,5-TMA
#159	TMA-3	2,3,4-TMA
#160	TMA-4	2,3,5-TMA
#161	TMA-5	2,3,6-TMA
#162	TMA-6	2,4,6-TMA

(b)(7)(C) also advised that nearly all the hallucinogens on SHULGIN's list could be considered controlled substance analogues.

ATTACHMENTS:

1. Phenethylamine list from SHULGIN's book "PIHKAL"
2. List from DEA/ODE

INDEXING SECTION:

1. SHULGIN, Alexander - NADDIS: 294983

(b)(7)(C)

REPORT OF INVESTIGATION

Page 1 of 1

1. PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE NO. R3-93-2077	4. G-DEP IDENTIFIER (b)(7)(E)
5. BY: (b)(7)(C),(b)(7)(F) AT: Investigator San Francisco, CA	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		6. FILE TITLE (b)(7)(C)	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:			8. DATE PREPARED July 8, 1994	
9. OTHER OFFICERS:				
10. REPORT RE: Dr. SHULGIN, "High Times" Article (PM40)				

DETAILS:

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

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

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

ATTACHMENTS:

- 1. High Times Article, August 1994 issue

INDEXING SECTION:

- 1. SHULGIN, Alexander - NADDIS: 1904492, 294983
- 2. (b)(7)(C)

11. DISTRIBUTION: REGION DISTRICT OTHER AMRI, ODOD	(b)(7)(C),(b)(7)(F)	13. DATE 7/15/94
DEA Form (May 1980) - 6 (b)(7)(C)		15. DATE 7/15/94

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

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

REPORT OF INVESTIGATION

Page 1 of 2

1. PROGRAM CODE	2. CROSS FILE RELATED FILES	3. FILE NO. R3-93-2077	4. G-DEP IDENTIFIER (b)(7)(E)
5. BY: (b)(7)(C),(b)(7)(F) AT: Investigator San Francisco, CA	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	6. FILE TITLE (b)(7)(C)	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:		8. DATE PREPARED June 21, 1994	
9. OTHER OFFICERS: BMQA Investigator (b)(7)(C)			
10. REPORT RE: Meeting with AUSA, BMQA Investigator (b)(7)(C) (PM30)			

DETAILS:

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

(b)(7)(C) AUSA (b)(7)(C) and Investigator (b)(7)(C),(b)(7)(F) also discussed conducting an administrative inspection of Dr. Alexander SHULGIN's registered address. Investigator (b)(7)(C),(b)(7)(F) provided AUSA (b)(7)(C) with a rough draft of an administrative inspection warrant for Dr. SHULGIN's DEA registered location.

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

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

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

11. DISTRIBUTION:

REGION

DISTRICT

OTHER AMRI, ODOD

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

13. DATE

6/24/94

15. DATE

6/24/94

For

Supervisor

DEA Form (May 1980) - 6

(b)(7)(C)

DEA SENSITIVE

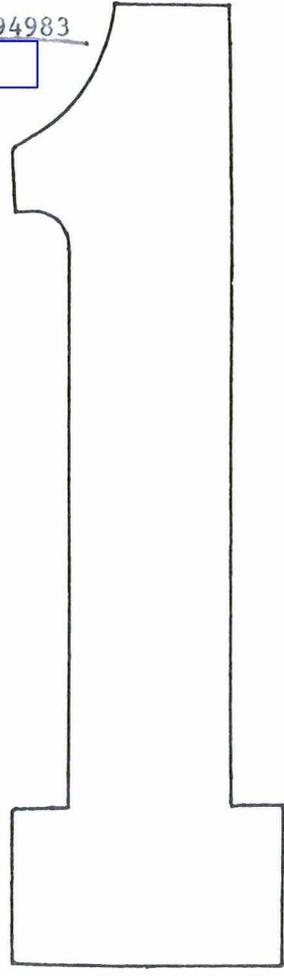
DRUG ENFORCEMENT ADMINISTRATION

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

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
4. Page 2 of 2	6. DATE PREPARED June 21, 1994	
5. PROGRAM CODE		

INDEXING SECTION:

- 1. AX SHULGIN, Alexander - NADDIS: 294983
- 2. AX (b)(7)(C)



REPORT OF INVESTIGATION

Page 1 of 5

1. PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE NO. R3-93-2077	4. G-DEP IDENTIFIER (b)(7)(E)
5. BY: (b)(7)(C),(b)(7)(F) AT: Investigator San Francisco, CA	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	AX	6. FILE TITLE (b)(7)(C)	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:			8. DATE PREPARED March 15, 1994	
9. OTHER OFFICERS: BMQA Investigator (b)(7)(C)				
10. REPORT RE: Dr. SHULGIN's "Yes" Response to Item 5b on DEA-225 Renewal Application (PM40)				

SYNOPSIS:

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

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

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

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

"Concerning the "yes" response to item 5b, the CSA Registration PS0026202, issued for research in the area of scheduled drugs, was abandoned in 1977. The projects that had been underway were completed and no new application to the research advisory board was made. If such projects are to be instituted in the future will be made to the DEA for re-licensing.

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

11. DISTRIBUTION:	(b)(7)(C),(b)(7)(F)	13. DATE 3/25/94
REGION		15. DATE 3/25/94
DISTRICT		
OTHER AMRI, ODOD	(b)(7)(C)	

DEA Form (May 1980) - 6

(b)(7)(C)

DEA SENSITIVE
DRUG ENFORCEMENT ADMINISTRATION

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

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

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.

Very truly yours,

(b)(7)(C)

Acting Chief Counsel, DEA

Investigator (b)(7)(C),(b)(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 (May 1980) - 6a (b)(7)(C)

DEA SENSITIVE

DRUG ENFORCEMENT ADMINISTRATION

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

Previous edition may be used.

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

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 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.

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
4. Page 4 of 5	6. DATE PREPARED March 15, 1994	
5. PROGRAM CODE		

Failure to submit an annual report for 1976.

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

Deficiencies in amended protocol.

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

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

2.c In the protocol you indicate that you are uncertain whether tetrahydrocannabinol or cannabinal 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?

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

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, or until June 30, 1977, whichever comes first.

Very truly yours,

EDWARD P. O'BRIEN
Chairman

(b)(7)(C) Pharm.D.
Executive Secretary

ATTACHMENTS:

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

INDEXING SECTION:

1. SHULGIN, Alexander - NADDIS: 294983

REPORT OF INVESTIGATION

Page 1 of 2

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) AT: Investigator San Francisco, CA	<input type="checkbox"/> CI-90-0106 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	6. FILE TITLE (b)(7)(C)	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:		8. DATE PREPARED March 9, 1994	
9. OTHER OFFICERS: BMQA Investigator (b)(7)(C)			
10. REPORT RE: Dr. SHULGIN - Illegal Manufacture of Hallucinogenics (PM40)			

DETAILS:

1. Reference is made to DEA ROI same file number and title as this report dated February 15, 1994 report re: Federal Express Records, Connection to Dr. SHULGIN's Drug Lab.

(b)(7)(C)

11. DISTRIBUTION: REGION DISTRICT OTHER AHRI, ODOD, ODC	(b)(7)(C), (b)(7)(F)	13. DATE 3/11/94 15. DATE 3/11/94 Supervisor
---	----------------------	--

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

DEA SENSITIVE
DRUG ENFORCEMENT ADMINISTRATION

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

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
4. Page 2 of 2	6. DATE PREPARED March 9, 1994	
5. PROGRAM CODE		

4. Reference is made to Dr. SHULGIN's book PIHKAL (Phenethylamines I have Known and Loved) copyright 1991 throughout his book, Dr. SHULGIN acknowledges his illicit use of Heroin, Cocaine, Marijuana, Mescaline and over 170 Hallucinogenics. Dr. SHULGIN also states that he has distributed Hallucinogenic drugs to (b)(7)(C) and numerous psychiatrists and chemists. Dr. SHULGIN also states that he has a vast inventory of controlled substances that he has collected over the years. Dr. SHULGIN cites his illegal use and human research of Hallucinogenics through the mid 80's. Dr. SHULGIN also provides detailed recipes for 178 Hallucinogenics in his book and documents his reaction to them. Dr. SHULGIN is not authorized to conduct research by the DEA. He had his DEA Researcher Registration revoked in 1977.

5. Under his DEA Analytical Lab Registration Number PS0061616, Schedules I-V, Dr. SHULGIN is required to maintain the following records:

21 CFR 1304.27 - Records for chemical analysis

- (a)(2) The forms or forms in which the controlled substance is received, imported or manufactured by the registrant and the concentration of the form.
- (a)(3) The total number of forms manufactured and the name address and registration number if any of the person from who the controlled substance was received.
- (a)(4) The quantity distributed, exported or destroyed in any manner by the registrant (except quantities used in chemical analysis or other laboratory work), including the date and manner of distribution, exportation or destruction, and the name, address and registration number of each person to whom the substance was distributed or exported.

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

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

INDEXING SECTION:

- 1. SHULGIN, Alexander - NADDIS: 1904492, 294983
- 2. (b)(7)(C)
- 3. (b)(7)(C)
- 4. (b)(7)(C)

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

DEA SENSITIVE
DRUG ENFORCEMENT ADMINISTRATION
This report is the property of the Drug Enforcement Administration.
Neither it nor its contents may be disseminated outside the Agency to which loaned.

Previous edition may be used.

REPORT OF INVESTIGATION

Page 1 of 4

1. PROGRAM CODE	2. CROSS FILE RELATED FILES <input type="checkbox"/> CI-90-0106 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	3. FILE NO. R3-93-2077	4. G-DEP IDENTIFIER (b)(7)(E)
5. BY: (b)(7)(C),(b)(7)(F) AT: Investigator San Francisco, CA		6. FILE TITLE (b)(7)(C)	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:		8. DATE PREPARED February 15, 1994	
9. OTHER OFFICERS: BMQA Investigator (b)(7)(C)			
10. REPORT RE: Federal Express Records, Connection to Dr. SHULGIN's Drug Lab (PM40)			

SYNOPSIS:

(b)(7)(C)

(b)(7)(C) Dr. SHULGIN is registered with the DEA as an Analytical Lab, Schedules I-V. Dr. SHULGIN synthesized STP and has been tied to the illegal manufacture and use of hallucinogenics.

DETAILS:

(b)(7)(C)

11. DISTRIBUTION:

REGION
DISTRICT
OTHER AMRI, ODO, ODC

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

13. DATE
2/29/94

15. DATE
2/29/94

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

DEA SENSITIVE
DRUG ENFORCEMENT ADMINISTRATION

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

REPORT OF INVESTIGATION
(Continuation)

1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
3. FILE TITLE (b)(7)(C)	
4. Page 2 of 4	
5. PROGRAM CODE	6. DATE PREPARED February 15, 1994

(b)(7)(C)

3. On February 10, 1994, BMQA Investigator (b)(7)(C) gave Investigator (b)(7)(C),(b)(7)(F) Federal Express Records documenting delivery transactions for (b)(7)(C). Reference is made to Federal Express Invoice #4-774-61293 dated 09/24/92. (See attachment #1)

(b)(7)(C)

Date

Recipient of Information
and Proof of Delivery

(b)(7)(C)

1483 Shulgin Road
Lafayette, CA 94549
Signed: (b)(7)(C)

(b)(7)(C)

Service: 1 Economy Package

Alexander SHULGIN's (b)(7)(C)

A review of DEA records on address 483 Shulgin Rd., Lafayette, CA 94549, revealed the following:

Name: SHULGIN, Alexander T. (NADDIS: 294983)
1483 Shulgin Rd.
Lafayette, CA 94549

Occupation: Researcher Chemist

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

DEA SENSITIVE
DRUG ENFORCEMENT ADMINISTRATION
This report is the property of the Drug Enforcement Administration.
Neither it nor its contents may be disseminated outside the Agency to which loaned.

Previous edition may be used.

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
4. Page 3 of 4	6. DATE PREPARED February 15, 1994	
5. PROGRAM CODE		

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

SHULGIN, Alexander T.
1483 Shulgin Road
Lafayette, CA 94549
Analytical Lab, Schedules 1, 2, 3, 3N, 4, 5
Expires 02/28/94, Approved 1971

Alexander T. SHULGIN had his DEA Researcher schedule I registration PS0026206 revoked in 1977 based on the withdrawal of the approval of SHULGIN's schedule I research projects by the California Research Advisory Panel (CRAP). The Research Advisory Panel found that SHULGIN supplied Mescaline for a research project at the University of California at San Diego to an individual who was not registered with the DEA and without using an Official DEA Order Form (Case #R3-77-2007). CRAP also found that SHULGIN conducted unauthorized use of human subjects for research with a new investigational drug. (See attached CRAP letters citing violations, attachment #2).

4. Reference is made to correspondence from (b)(7)(C), Acting Chief Counsel, DEA, to Alexander T. SHULGIN, PhD., RE: Order to Show Cause (Revocation) DEA Registration PS0026206 dated June 9, 1977. This letter advises Dr. SHULGIN that DEA received his written response to DEA's Order to Show Cause in lieu of a Hearing and that the DEA Administrator has considered Dr. SHULGIN's response and concluded that Dr. SHULGIN's registration as a researcher in schedule I should be revoked effective immediately. (See attached DEA letter, attachment #3).

(b)(7)(C)

The following individuals are acknowledged in SHULGIN's book:

(b)(7)(C)

(b)(7)(C)

REPORT OF INVESTIGATION (Continuation)	1. FILE NO. R3-93-2077	2. G-DEP IDENTIFIER (b)(7)(E)
	3. FILE TITLE (b)(7)(C)	
4. Page 4 of 4	6. DATE PREPARED February 15, 1994	
5. PROGRAM CODE		

(b)(7)(C)

See attached excerpt from SHULGIN's book documenting his illegal human testing involving experimental drugs (attachment #5).

ATTACHMENTS:

1. Federal Express Invoice, dated 09/24/92
2. CRAP Correspondence
3. DEA Order to Show Cause Revocation Correspondence, dated 06/09/77
4. SHULGIN's Protocol for MDMA Project
5. Excerpt from Dr. SHULGIN's book

INDEXING SECTION:

- A 1. (b)(7)(C)
- AT 2. SHULGIN, Alexander T. - NADDIS: 1904492, 294983
- AD3. (b)(7)(C)
- AD4.
- AD5.

REPORT OF INVESTIGATION

1. PROGRAM CODE (b)(7)(C),(b)(7)(F)	2. CROSS FILE <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	RELATED FILES	3. FILE NO. GPC-91-3009 4. G-DEP IDENTIFIER
5. BY: Investigator AT: San Francisco, CA		6. FILE TITLE SHULGIN, Alexander T. 1483 Shulgin Road Lafayette, CA	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:		8. DATE PREPARED April 24, 1992	
9. OTHER OFFICERS: D/I (b)(7)(C),(b)(7)(F)			
10. REPORT RE: On-site visit with Dr. Alexander SHULGIN (RA00)			

SYNOPSIS:

Information was received from a Special Agent of the San Francisco Field Division that Dr. Alexander SHULGIN was possibly shipping DEA drug evidence to an unregistered location for analysis.

An on-site meeting with Dr. SHULGIN at his registered location (residence) revealed that the drug analysis was performed by a Dr. (b)(7)(C), but in Dr. SHULGIN's laboratory under his supervision. No action was taken regarding this investigation.

DETAILS:

1. Investigator (b)(7)(C),(b)(7)(F) of the San Francisco Field Division, Diversion Control Unit received information from Special Agent (b)(7)(C),(b)(7)(F) that 600 dosage units of suspected LSD was sent to Dr. Alexander SHULGIN for analysis. S/A (b)(7)(C),(b)(7)(F) further stated that the actual analysis was performed by an (b)(7)(C) institute for research and consulting located in Santa Rosa, California. S/A

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

2. Inquiries were made in the DEA master computer, CSA subprogram regarding both Dr. SHULGIN and (b)(7)(C)

(b)(7)(C)
The inquiry regarding Dr. SHULGIN revealed DEA Number: PS0061616 for 1483 Shulgin Road, Lafayette, California as an analytical lab. The registration is for Schedules I, II, III, IIIN, IV and V expiration date of February 28, 1993. No administrative codes restricting the registration were in effect.

11. DISTRIBUTION: REGION DISTRICT OTHER AMRI, ODOD (b)(7)(C)	12. SIGNATURE (Agent) (b)(7)(C),(b)(7)(F) Investigator 14. APPRO (b)(7)(C),(b)(7)(F) (b)(7)(C),(b)(7)(F), Group Supervisor	13. DATE 5/20/92 15. DATE 5/21/92
--	---	--

DEA Form - 6
(May 1980)

DEA SENSITIVE
DRUG ENFORCEMENT ADMINISTRATION

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

REPORT OF INVESTIGATION (Continuation)		1. FILE NO.	2. G-DEP IDENTIFIER
		CFR3-91-3009	
4. Page of		3. FILE TITLE	
2 4		SHULGIN, Alexander T. 1483 Shulgin Road Lafayette, CA	
5. PROGRAM CODE		6. DATE PREPARED	
		April 24, 1992	

3. Inquiries into NADDIS, Narcotic and Dangerous Drugs Information System regarding both SHULGIN and (b)(7)(C) were made. (b)(7)(C)

(b)(7)(C) NADDIS number 294983 is assigned to Alexander SHULGIN. The NADDIS record was initiated in February of 1975. Various reports concerning Dr. SHULGIN have been made alleging illegal activity involving clandestine laboratories and the manufacture of designer drugs. The NADDIS record showed case file R3-85-2025 in which Dr. SHULGIN was the subject of the investigation.

4. A review of case file R3-85-2025 documents that an on site investigation of the doctor's registered location (residence) was conducted. The investigation was based on the belief that the doctor was manufacturing MDMA and shipping the substance to unregistered locations. The investigation disclosed no grounds for criminal, civil or administrative action. The case was closed on January 15, 1986.

5. On April 20, 1992, Investigators (b)(7)(C),(b)(7)(F) travelled to 1483 Shulgin Road, Lafayette, California in order to meet with Dr. SHULGIN. The investigators spoke with the doctor's wife who stated that the doctor was not in and would not be returning until later in the day. Investigator (b)(7)(C),(b)(7)(F) gave Mrs. (b)(7)(C) his business card and requested that Dr. SHULGIN contact him as soon as possible. At approximately 3:00 p.m., on April 20, 1992, Investigator (b)(7)(C),(b)(7)(F) received a telephone call from Dr. SHULGIN. Arrangements were made for a meeting on April 22, 1992.

6. On April 22, 1992, Investigators (b)(7)(C),(b)(7)(F) again travelled to 1483 Shulgin Road, Lafayette, California. The investigators met with Dr. SHULGIN and his wife. The investigators presented their credentials and a DEA Notice of Inspection (DEA-82) to Dr. SHULGIN. Dr. SHULGIN was informed of his rights regarding the inspection and asked to read the Notice of Inspection. After reading the form, Dr. SHULGIN authorized the inspection by virtue of his signature on the form (attachment 1). Investigators (b)(7)(C),(b)(7)(F) signed as witnesses, and a copy of the Notice of Inspection was provided to Dr. SHULGIN.

7. The investigators informed Dr. SHULGIN the purpose of their visit was to determine the activities involving the 600 dosage units of LSD that had been sent to him for analysis.

8. Dr. SHULGIN stated that he had received the controlled substance from the DEA laboratory in San Francisco. Dr. SHULGIN showed the investigators a copy of a DEA-12 (receipt for cash or other items) that documented the receipt. Dr. SHULGIN 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 controlled substance.

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. FILE NO. GFR3-91-3009	2. G-DEP IDENTIFIER
	3. FILE TITLE SHULGIN, Alexander T. 1483 Shulgin Road Lafayette, CA	
4. Page 3 of 4	6. DATE PREPARED April 24, 1992	
5. PROGRAM CODE		

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" from that position.

(b)(7)(C)

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

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

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

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

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

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. FILE NO. GFR3-91-3009	2. G-DEP IDENTIFIER
	3. FILE TITLE SHULGIN, Alexander T. 1483 Shulgin Road Lafayette, CA	
4. Page 4 of 4	6. DATE PREPARED April 24, 1992	
5. PROGRAM CODE		

Division.

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

15. On April 24, 1992, Investigator (b)(7)(C),(b)(7)(F) then telephonically contacted (b)(7)(C) of the DEA Western Laboratory and confirmed the receipt of the LSD tabs from Dr. SHULGIN in March of 1992.

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:

- AX 1. SHULGIN, Alexander T. - NADDIS: 294983

NT

REPORT OF INVESTIGATION

Page 1 of 1

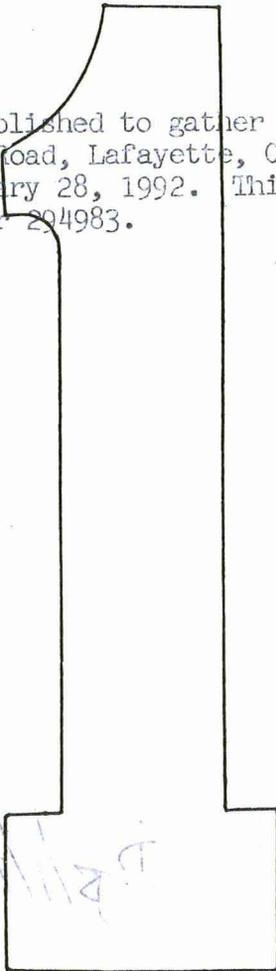
1. PROGRAM CODE	2. CROSS FILE	3. FILE NO. GFR3-91-3009	4. G-DEP IDENTIFIER
5. BY: (b)(7)(C),(b)(7)(F) Investigator AT: San Francisco, CA	RELATED FILES NEW CASE <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	6. FILE TITLE SHULGIN, Alexander T. 1483 Shulgin Road Lafayette, CA 94549	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:		8. DATE PREPARED June 6, 1991	
9. OTHER OFFICERS:			
10. REPORT RE: Establishment of General File (RA00)			

DETAILS:

1. This general file has been established to gather reports and correspondence for SHULGIN, Alexander T., 1483 Shulgin Road, Lafayette, California 94549, DEA Registration Number PS0061616 which expires February 28, 1992. This registrant is an analytical lab which has been assigned NADDIS number 294983.

INDEXING SECTION:

AT SHULGIN, Alexander T.
NADDIS: 294983



11. DISTRIBUTION: REGION	12. SIGNATURE (Agent) (b)(7)(C),(b)(7)(F) Investigator	13. DATE 6/11/91
DISTRICT	14. (b)(7)(C),(b)(7)(F)	15. DATE
OTHER AMRT, ODO	(b)(7)(C),(b)(7)(F) Group Supervisor	6/12/91

DEA Form - 6
(May 1980)

(b)(7)(C)

DEA SENSITIVE
DRUG ENFORCEMENT ADMINISTRATION

This report is the property of the Drug Enforcement Administration.
Neither it nor its contents may be disseminated outside the agency to which loaned.
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 plus-threes 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, heartfelt, open, clear, receptive, relaxed, willing, interested, curious, stimulated, attentive, connected, eager, anxious, anticipation, apprehension, concerned, nervous, scattered, tired, varied, confused, down, muddy. Notable exceptions were: "Rife with anticipation." "Minimal haunting by my usual demons." "Eager to try but anxiety about dosage." "Concerned about effects of 'speed' content due to my heart condition."

Set during the experience

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

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

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

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

Therapeutic effect reported

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

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

Interpretation

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

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

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

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

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

Suggestions for further research

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

Acknowledgments

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

Notes and References

1 Shulgin, A.T, Personal communication April 2000, see also note 5.

2 Subjective has many definitions, which denotes the subjective explanations of the word subjective. This extends well to the assay of a chemical in that a subjective bioassay is unique to each individual organism's biochemistry and perspective of stimuli.

- 3 <http://www.heffter.org/Arthur.html> last checked May 6, 2000.
- 4 Shulgin & Shulgin (1991, 1998). PiHKAL: A Chemical Love Story. Berkeley, CA: Transform Press.
- 5 Stolaroff, M.J. (1994). Thanatos to Eros; 35 years of Psychedelic Exploration, Berlin: GAM-Media GmbH.
- 6 For an explanation of the 'plus' rating of subjective bioassay experiences see PiHKAL p. xxiv. in Note 4.
- 7 Csordas, T.J. & Kleinman A. (1996). The Therapeutic Process. In: Medical Anthropology: Contemporary theory and method, Rev. Ed. C.F. Sargent and T.M. Johnson (eds.). Connecticut: Praeger Publishers.
- 8 Five participants each reported one previous bioassay, two reported two previous bioassays, two reported three previous bioassays, and three reported six, seven and 15 previous bioassays respectively.
- 9 Sapir, E. (1929). "The Status of Linguistics as a Science" In E. Sapir (1958, p. 69), Culture, Language and Personality (ed. D. G. Mandelbaum). Berkeley, CA: University of California Press.

[Next article](#)



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

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



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

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

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

It was a glowing statement from the man believed to have consumed a wider variety of drugs than anyone else on the planet.

In his fifty-plus years as a chemist, the genial, wild-haired Shulgin, who is better known to his friends and admirers as "Sasha," has become a renegade scientific folk hero responsible for bringing more than two hundred new drugs into the world.

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

Shulgin does not design drugs for the commercial market.

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

In 1991, the couple published the first in a series of 800-page books that included directions for synthesizing a total of more than 200 chemical compounds, including 2C-T-7. PIHKAL: A Chemical Love Story (the acronym stands for Phenethylamines I Have Known and Loved) was a unique book by any standard, weaving together lab procedure, highly personalized accounts of each compound's creation, and Sasha and Ann's own love story, as told in the

alternating voices of two not-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 guaifenesin. 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 dining-room 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 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 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 drug-awareness 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 e-mail survey of more than 400 people who had tried 2C-T-7 in a variety of dosage amounts, both by snorting and swallowing. The results of both studies reaffirmed what already had been posted on Erowid and Lycaeum trip reports.

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

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

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

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

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

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

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

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

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

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

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

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

Another compelling example is a drug

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

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

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

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

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

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

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

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

But the Shulgins' days of experimenting with 2C-T-7 and chemicals like it are behind them. After five decades of fascination with lab-made synthetics, Sasha Shulgin has turned his attention

to botanicals, in specific a rather unexplored type of cactus alkaloid called isoquinolines. The hill behind the Farm is speckled with more than one hundred cactus plants, and the beakers in his lab are now lined with a sludgy olive-green residue. He's at work on the manuscript for a third book, one the couple jokingly refers to as QIHKAL.

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

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

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

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



HOME

Refs

2C-T-7

Professor X

MDMA safety

MDMA advert

Designer Drugs

Ecstasy in the USA

Protect and Survive

MDMA: controversies

Ecstasy and the Brain

Charles Grob on MDMA

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


CENTER FOR COGNITIVE LIBERTY & I

Home

Top News

About

Contact

Publications

Navigate

Projects

Ask Dr. Shulgin Online

ARCHIVE: June 28, 2001
2C-T-7
Dear Dr. Shulgin:

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

--Haungar

Dear Haungar:

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

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

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

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

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

-- Dr. Shulgin

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


Dr. Alexander Shulgin

Learn more [about Dr. Shulgin](#)

ASK A QUESTION
BROWSE ARCHIVE
**RETURN TO
CURRENT Q/A**
**Buy Books by
Alexander & Ann
Shulgin!**


Visit the [bookstore](#) for more!

Society and Dr. Shulgin are not engaged in rendering legal or other professional advice (including, but not limited to, medical advice), and assume no such responsibility. The information herein is subject to change without notice and is not intended to be, nor should it be considered, a substitute for individualized legal, medical, or scientific advice rendered by a competent professional. [Terms of Use](#)

Ask Dr. Shulgin Online is a public education service of the CCLE. Please support our work to support and defend cognitive liberty by becoming a [member](#) today!

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

(b)(7)(C)

(b)(7)(C) Alexander Theodore 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 activities. 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).

(b)(7)(C)

REPORT OF INVESTIGATION

Page 1 of 1

1. Program Code	2. Cross File	Related Files	3. File No. RF-10-0004	4. G-DEP Identifier (b)(7)(E)
5. By: (b)(7)(C),(b)(7)(F) SA At: PORTLAND, OR DO	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		6. File Title (b)(7)(C)	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:			8. Date Prepared 05-25-2010	
9. Other Officers: None.				
10. Report Re: Clarification of DEA-6 dated 05-11-2010.				

DETAILS

(b)(7)(C)

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

INDEXING

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

11. Distribution: Division SEATTLE FLD DIV	(b)(7)(C),(b)(7)(F)	13. Date 05-25-2010
District		15. Date 5/25/10
Other		

REPORT OF INVESTIGATION

Page 1 of 8

1. Program Code	2. Cross File Related Files	3. File No. RF-10-0004	4. G-DEP Identifier (b)(7)(E)
5. By: (b)(7)(C),(b)(7)(F) SA At: PORTLAND, OR DO	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	6. File Title (b)(7)(C)	8. Date Prepared 05-11-2010
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:			
9. Other Officers: D/I (b)(7)(C),(b)(7)(F)			
10. Report Re: (b)(7)(C)			

SUMMARY

(b)(7)(C)

DETAILS

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

2. (b)(7)(C)

3. Reference is made to the Controlled Substance Analogue Enforcement Act of 1986 (CSAEA) which is further detailed in 21 USC 802 (32) (A) (i)(ii)(iii) and 21 USC 813.

4. The investigative theory of this case asserts that human consumption is the expected outcome of the manufacturing, distribution, possession, and research and testing of controlled substance analogues such as those listed herein. The following review of literature predominately references human testing and experimentation. Inherently, the legal issues encountered by Alexander SHULGIN, detailed herein, exemplify the potential for further legal penalties for those who violate the

11. Distribution: Division SEATTLE FLD DIV	(b)(7)(C),(b)(7)(F)	13. Date 05-13-2010
District		15. Date 5/14/10
Other		

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. RF-10-0004	2. G-DEP Identifier (b)(7)(E)
	3. File Title (b)(7)(C)	
4. Page 2 of 8	6. Date Prepared 05-11-2010	
5. Program Code		

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 (b)(7)(C),(b)(7)(F) review of the book PIHKAL 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), DEA 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,

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. RF-10-0004	2. G-DEP Identifier (b)(7)(E)
	3. File Title (b)(7)(C)	
4. Page 3 of 8		
5. Program Code	6. Date Prepared 05-11-2010	

Copyright 1991, Authored by Alexander Shulgin and (b)(7)(C)
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.

(b)(7)(C)

REPORT OF INVESTIGATION

(Continuation)

1. File No.
RF-04-0020

2. B-DEP Identifier
(b)(7)(E)

3. File Title
(b)(7)(C)

4.
Page 3 of 6

5. Program Code

6. Date Prepared
12/08/2004

(b)(7)(C)

(INVESTIGATORS NOTE: Alexander SHULGIN was a chemical scientist for DOW Chemical and is credited with synthesizing MDMA in 1976. SHULGIN is currently still active in researching mind altering drugs including LSD.)

(b)(7)(C)

REPORT OF INVESTIGATION

(Continuation)

1. File No.
CC-99-0007

2. G-DEP Identifier
(b)(7)(E)

3. File Title
(b)(7)(C)

4. Page 4 of 6

5. Program Code

6. Date Prepared
4/25/99

(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 (R3-93-2077).

(b)(7)(C)

DEA Form
(Aug. 1994)

-6a

(b)(7)(C)

DEA SENSITIVE
Drug Enforcement Administration

1-Prosecutor

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

Previous edition dated 5/80 may be used.

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. KF-11-0031	2. G-DEP Identifier (b)(7)(E)
	3. File Title (b)(7)(C)	
4. Page 7 of 11		
5. Program Code	6. Date Prepared 01-27-2011	

(b)(7)(C)

[Analyst's Note: The DEA raided a laboratory belonging to Alexander SHULGIN (NADDIS 294983) in 1994. The books, PiHKAL, A Chemical Love Story, and TiHKAL, The Continuation, are believed to be used as cookbooks on how to make illegal drugs. They also contain synthesis information for tryptamines.]

(b)(7)(C)

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. G3-08-0148	2. G-DEP Identifier (b)(7)(E)
	3. File Title (b)(7)(C)	
4. Page 4 of 7		
5. Program Code	6. Date Prepared 02/19/09	

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

U.S. Department of Justice
Drug Enforcement Administration

REPORT OF INVESTIGATION

1. Program Code SEP-581	2. Cross File <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Related Files <input type="checkbox"/> (b)(7)(C)	3. File No. GFR3-01-9282	4. G-DEP Identifier
5. By: I/A (b)(7)(C),(b)(7)(F) At: San Francisco, CA			6. File Title MDMA	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:			8. Date Prepared 1/23/01	
9. Other Officers:				
10. Report Re: The Rave Culture and Drug Intelligence				

SYNOPSIS:

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

DETAILS

Detective (b)(7)(C),(b)(7)(F) gave the following in-depth overview of the rave culture and scene:

1. The Rave Culture and History:

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

2. The Music and Dance

11. Distribution: Division see last page District Other	12. Signature (Agent) I/A (b)(7)(C),(b)(7)(F)	13. Date 11/07/01
	14. Approved (Name and Title) (b)(7)(C),(b)(7)(F) Group Supervisor	15. Date

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. GFR3-01-9282	2. G-DEP Identifier
	3. File Title MDMA	
4. Page 2 of 13	6. Date Prepared 1/23/01	
5. Program Code SEP-581		

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

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. GFR3-01-9282	2. G-DEP Identifier
	3. File Title MDMA	
4. Page 3 of 13	6. Date Prepared 1/23/01	
5. Program Code SEP-581		

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.

(b)(7)(E)

5. Rave Flyers

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

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

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

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. GFR3-01-9282	2. G-DEP Identifier
	3. File Title MDMA	
4. Page 4 of 13	6. Date Prepared 1/23/01	
5. Program Code SEP-581		

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

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. GFR3-01-9282	2. G-DEP Identifier
	3. File Title MDMA	
4. Page 5 of 13	6. Date Prepared 1/23/01	
5. Program Code SEP-581		

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

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

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

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

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

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

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

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

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

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

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. GFR3-01-9282	2. G-DEP Identifier
	3. File Title MDMA	
4. Page 6 of 13	6. Date Prepared 1/23/01	
5. Program Code SEP-581		

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 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

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. GFR3-01-9282	2. G-DEP Identifier
	3. File Title MDMA	
4. Page 7 of 13	6. Date Prepared 1/23/01	
5. Program Code SEP-581		

- b. Drop, roll and ecstasy are code words for drugs/doing drugs.
- c. Lotus is a popular rave magazine that is produced in Los Angeles, CA.
- d. DANCE SAFE - a harm reduction organization based in Oakland, CA. Dance Safe has chapters in Oakland, Seattle and Canada. They will test suspected drugs at raves and post the results on their website: www.dancesafe.org. They have a slide show on MDMA on their website. They don't clean the razor blade when testing ecstasy tablets, so they have cross contamination. They use the marquis reagent kit, so they have a lot of false positives and cannot identify other narcotic substances in the pills.
- e. Historical rave intelligence can be obtained at www.ravedata.com.
- f. You can run rave promoters in www.whois.com for current intelligence.
- g. SHA SHA SHOES has a web site that sells shoes with hidden compartments at: www.sha-sha.com
- h. Ravers hide drugs in candy, breath mints and in Pez containers.
- i. Three stores in California that sell rave clothing and paraphernalia are HOT TOPICS, MR. RAGS and GADZOOKS.
- j. KIKWEAR makes pants with hidden compartments and HEADCASE makes ballpark hats with hidden compartments for drugs. They also make shirts with a hidden compartment inside the label for drugs.
- k. "EKG" = Ecstasy, Ketamine and GHB.

11. Club Drugs:

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

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. GFR3-01-9282	2. G-DEP Identifier
	3. File Title MDMA	
4. Page 8 of 13	6. Date Prepared 1/23/01	
5. Program Code SEP-581		

- 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.

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. GFR3-01-9282	2. G-DEP Identifier
	3. File Title MDMA	
4. Page 9 of 13	6. Date Prepared 1/23/01	
5. Program Code SEP-581		

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 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.

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

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. GFR3-01-9282	2. G-DEP Identifier
	3. File Title MDMA	
4. Page 10 of 13	6. Date Prepared 1/23/01	
5. Program Code SEP-581		

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

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

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

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

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

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

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

13. MDMA Powder:

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

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. GFR3-01-9282	2. G-DEP Identifier
	3. File Title MDMA	
4. Page 11 of 13	6. Date Prepared 1/23/01	
5. Program Code SEP-581		

b. Homemade tableting 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. Tableting 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.

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. GFR3-01-9282	2. G-DEP Identifier
	3. File Title MDMA	
4. Page 12 of 13	6. Date Prepared 1/23/01	
5. Program Code SEP-581		

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.

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. GFR3-01-9282	2. G-DEP Identifier
	3. File Title MDMA	
4. Page 13 of 13	6. Date Prepared 1/23/01	
5. Program Code SEP-581		

g. Ketamine abusers may work in a veterinary clinic (or break into one) or go to Mexico to obtain Ketamine.

h. Ketamine leaves one's blood in 2-3 hours and the urine in 36-48 hours. Ketamine is NOT detected with drug field test kits.

INDEXING

- 1. AD 5335598 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. AT HEADCASE - NADDIS Negative (WS) www.headcase.com 4997663
- 10. AT www.bluelight.nu - NADDIS # 5173242
- 11. AT SHULGIN, Alexander - NADDIS #294983
- 12. NI www.ravedata.com - NADDIS Negative
- 13. NI www.whois.com - NADDIS Negative

Distribution:

SFFD/Group 2
HIDTA/Clifton
Houston (I/A (b)(7)(C),(b)(7)(F))
NDAD, EPIC, SARI
New Orleans (I/A (b)(7)(C),(b)(7)(F))

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. R3-97-0285	2. G-DEP Identifier [REDACTED]
	3. File Title [REDACTED]	
4. Page 2 of 7	6. Date Prepared 10/21/99	
5. Program Code SEP 581		

[REDACTED]

4. At approximately 2202 hrs. S/A's [REDACTED] observed a white male with collar length white hair at the open passenger door of a blue 1995 GMC van displaying California license plate number [REDACTED] S/A [REDACTED] recognized this man to be Dr. Shulgin. California DMV records show the registered owner of this van to be Alexander T. or [REDACTED] Shulgin at 1483 Shulgin Rd., Lafayette, CA. (Note: S/A [REDACTED] had seen Dr. Shulgin at his Lafayette residence in December 1998 during an alleged methamphetamine lab investigation conducted by the Contra Costa County Sheriff's Dept.) Surveillance, S/A's [REDACTED] [REDACTED] followed Dr. Shulgin to the entrance of Shulgin Rd. in Lafayette, CA.

[REDACTED]

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. R3-97-0285	2. G-DEP Identifier (b)(7)(E)
	3. File Title (b)(7)(C)	
4. Page 3 of 7		
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 (R/O): Alexander T., or (b)(7)(C) Shulgin at 1438 Shulgin Rd., Lafayette, CA.

(b)(7)(C)