



February 10, 2015

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Joe Gorder
President and Chief Executive Officer
Valero Energy Corporation
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San Antonio, TX 78249

Dear Messrs. Dudley, Watson, Martinez, Tillerson, Heminger, Garland, Odum, Owens, and Gorder:

We, the undersigned Attorneys General, are writing to express our deep concerns over the problem of gas stations and convenience stores operating under the brand names of your companies and selling synthetic drugs that are illegal and extremely dangerous. Given the significant danger synthetic drugs present to users, especially our young people, we are extremely troubled that these drugs have been readily available in well-known retail locations.

Regrettably, over the past few years, dozens of owners, managers and employees of branded gas stations and convenience stores have been arrested

for selling synthetic drugs. A review of press accounts regarding the efforts of our offices along with other enforcement agencies has confirmed more than 130 instances of branded gas stations selling synthetic drugs in 29 states.¹ Multiple seizures in recent months unfortunately demonstrate that the problem continues across the country.²

Law enforcement agencies at the local, state, and federal levels have expended considerable resources battling the rise of synthetic drugs. These efforts were made more complicated at the outset because the drugs were designed to evade existing state and federal drug laws. While synthetic drugs are illegal, the initial confusion surrounding the legality of synthetic drugs enabled drug dealers to convince retail locations, like “smoke shops,” gas stations and convenience stores that it was lawful for the stores to sell products to consumers. With widespread access, use of synthetic drugs rose rapidly.

Making matters worse, the health consequences associated with taking synthetic drugs can be devastating and lethal. In 2010, over 11,000 people, many of whom were younger than seventeen, went to the emergency room after using synthetic marijuana.³ In 2011, that number more than doubled, growing to 28,000.⁴ Since then, thousands more have been harmed by synthetic drugs. In 2014, for example, one health department reported a 220% increase in

¹ See, e.g., The Topeka Capital-Journal, “Police: Warrants Executed at 8 Topeka Locations in Connection with Sale of K2,” (Oct. 22, 2013) (citing bust at Conoco station); The Citizen-Times, “Bizarro Bust at Local Gas Station,” (March 20, 2013) (citing bust at Exxon); Ocala Star Banner, “13 Arrested, More than 3,500 Packets of Fake Pot Confiscated,” (Sept. 12, 2013) (citing bust at Sunoco and BP stations); The MetroWest Daily, “Police: Pair Sold Drugs Out of Store Arrested for Selling Cocaine-laced Bath Salts,” (Jan. 10, 2013) (citing bust at Valero station); Los Angeles Times, “DEA Targets Gas Station, Jeweler in 29-State Synthetic Drug Sweep,” (May 7, 2014); AP, “Federal Agents Target Synthetic Drugs, Sellers,” (May 7, 2014) (citing busts of manufacturers and sellers in 29 states including Alabama, Alaska, California, Colorado, Florida, Georgia, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maryland, Massachusetts, Michigan, Mississippi, Missouri, New Jersey, New Mexico, New York, Ohio, Oklahoma, South Carolina, Tennessee, Texas, Utah, Washington, West Virginia and Wisconsin).

² See, e.g., WWSB, “Synthetic Drugs Seized from Charlotte County Convenience Store,” (July 31, 2014) (citing bust at Chevron station); Ocala Star Banner, “Store Clerk Charged with Sale of Synthetic Marijuana,” (July 18, 2014) (citing bust at Shell station); The Elkhart Truth, “20 Arrested in Michiana Synthetic Marijuana Raids,” (June 10, 2014) (citing busts at two Marathon stations); WFMD, “‘Spice’ Valued at More Than \$100,000 Seized Tues. in Gas Station Raids,” (May 21, 2014) (citing busts at two BP stations); WTVM Birmingham, “Texaco Gas Station in Birmingham Raided as Part of a Statewide Synthetic Drug Operation,” (May. 7, 2014) (citing bust at Texaco station); AL.com, “Warrants Executed in Montgomery, Lee Counties in Nationwide Synthetic Drug Raid,” (May 7, 2014) (citing bust at BP station); Chattanooga Times Free Press, “Four Arrested in Chattooga on Charges of Possession of and Intent to Distribute Synthetic Marijuana,” (May 3, 2014) (citing bust at BP station); ABC 57 News, “Police Raid gas station in search of synthetic marijuana,” (Apr. 23, 2014) (citing bust at Phillips 66); Pharos-Tribune, “Convenience Store Owner Arrested on Drug Charges,” (March 26, 2014) (citing bust at BP station); State of Rhode Island, “Press Release: Multi-Agency Effort Results in Seven Arrests on Narcotics Charges and the Seizure of Over 1,200 Packets of Synthetic Marijuana and Over \$21,000,” (Feb. 14, 2011) (citing bust at Shell station); Daily Commercial, “Gas Station Employee Accused of Selling Drugs,” (Jan. 30, 2014) (citing bust at Mobil station); Seminole Chronicle, “Seminole County Sheriff’s Office Cracks Down on Synthetic Drugs,” (Jan. 22, 2014) (citing bust at Citgo station).

³ U.S. Department of Health and Human Services, “National Estimates of Drug-Related Emergency Room Visits,” (2010).

⁴ U.S. Department of Health and Human Services, “National Estimates of Drug-Related Emergency Room Visits,” (2011).

emergency room visits due to the ingestion of synthetic marijuana.⁵ Dozens of overdoses and deaths have been linked to synthetic drugs.⁶ Manufacturers of synthetic drugs seek to evade state and federal law by creating chemical compounds not yet specifically regulated or prohibited in the United States. In so doing, they create synthetic versions of drugs that are just as dangerous, if not more so, than the drugs they seek to mimic.

The fact that synthetic drugs have been available at locations operating under respected brand names has only exacerbated an already growing problem. Young people are the most likely to use these dangerous drugs and their availability in stores operating under well-known brands gives the appearance of safety and legitimacy to very dangerous products. Your companies spend millions of dollars on marketing campaigns designed to convince consumers that your brands are trustworthy. Enforcing strong policies against the sale of synthetic drugs in your retail locations can only protect your brand reputation while also protecting our youth.

We ask that you work with us in our efforts to eliminate synthetic drugs from retail locations. Young people should not die or be seriously injured from using products bought at gas stations or convenience stores. While we acknowledge that the sale of synthetic drugs at retail locations is only one aspect of an ongoing problem, we do know it has greatly contributed to the growth of the problem.

We believe that your companies should consider taking the following actions to address this disturbing problem and we encourage you to implement them immediately:

- Prohibit your franchisees from selling any synthetic drugs;
- Ensure this prohibition is completely understood by your store franchisees and their employees by communicating directly with each of them;
- Establish a point of contact in your corporate office for your franchisees, should they have questions about synthetic drugs;
- Revoke your franchisee/franchisor relationship with any gas station or convenience store that sells any kind of synthetic drug;
- Provide your franchisees with ongoing instruction or training about the dangers of synthetic drugs; and
- Report to local law enforcement authorities if you learn that any franchisee is selling synthetic drugs.

⁵ Silive.com (Staten Island, New York), "Health Department Sees Huge Spike in Emergency Room Visits Because of Synthetic Pot," (July 28, 2014).

⁶ See, e.g., KXAN, "Teen Overdoses on Synthetic Drug," (Apr. 25, 2013); CNN, "Three Deaths May Be Tied to Synthetic Drugs in Colorado," (Sep. 7, 2013); Star Tribune, "New Drugs Fuel Wave of Violence and Death," (Sep. 9, 2011); CNN, "Teen Narrowly Escapes Death After Smoking Synthetic Marijuana," (Feb. 5, 2013).

It is crucial that we initiate and maintain a continuing dialogue regarding this important issue to ensure that synthetic drugs are no longer available in any branded gas station or convenience store in this country. Toward that end, we ask that you each provide us with a point of contact for your company so that we may follow up and discuss these issues. Of course, you should also feel free to reach out to us directly on these matters.

We look forward to hearing from you.

Sincerely,



Pamela Jo Bondi
Florida Attorney General



Lisa Madigan
Illinois Attorney General



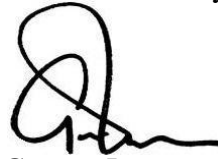
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Alabama Attorney General



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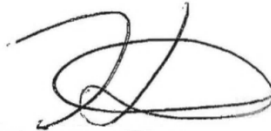
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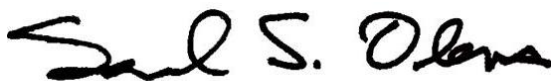
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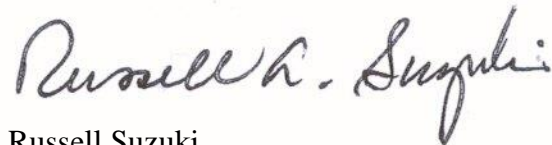
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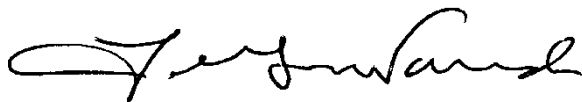
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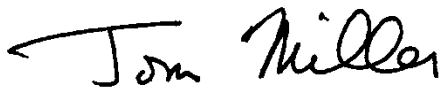
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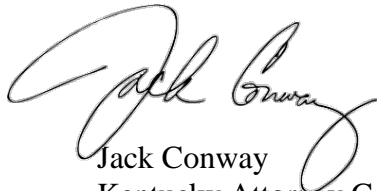
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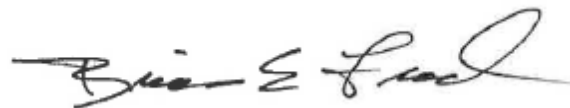
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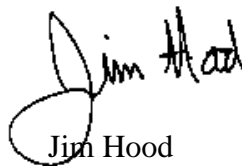
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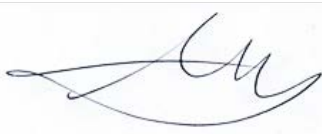
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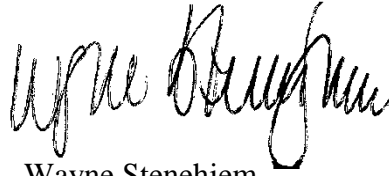
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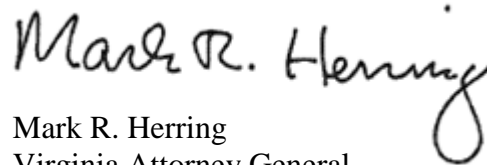
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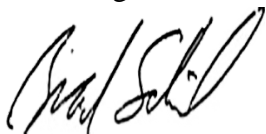
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