

-2-

- (c) The firm had shipped approximately 950 kilos of amphetamine resin since January 1970, (enough to produce 45,000,000 dosage units of Difenotamina) to the subsidiary firm in Mexico City, Mexico.
- (d) That there were distinct differences in filled weights, capsule markings, etc., between Bifenotamina produced for domestic distribution by the plant in Rochester, New York, and Difenotamina produced by the subsidiary firm Laboratorios de Strasensburgh, Mexico City, Mexico.
- (e) Many dosage units which had been seized by authorities were in original containers indicating production by the firm in Mexico City.
- (f) Flow patterns of illicit distribution throughout the Southern and Southeastern United States showed points of origin to be several locations along the US/Mexico border.
- (g) This product had become the drug of choice in the illicit traffic for truck drivers, and related industries and was available at truck stops throughout New Mexico, Texas, Georgia, Kentucky, Florida, Colorado, Oklahoma, Louisiana, Alabama and Tennessee.
- (h) The term "Black Hollies," "Black Beauties," "RJS's" and "Black Widows" were common street terms for this product, and over 173,000 dosage units of Difenotamina had been purchased and seized between April 1, 1971, and October 1, 1971.

The above factors clearly pointed out a situation where a U. S. firm was exporting large quantities of a Schedule II substance without maintaining effective controls against diversion into other than legitimate medical channels. The obvious over-production of Difenotamina in Mexico was then entering the illicit traffic through numerous sources along the US/Mexico border and being distributed throughout the southern portion of the United States.

It was decided at this time to take a Task Force approach to the problem. The objectives of the Task Force were:

- (a) To document as fully as possible the extent of diversion of Difenotamina by a concentrated program of purchases and seizures of evidence.