February 10, 2015

Bob Dudley  
Chief Executive Officer  
BP  
501 Westlake Park Blvd.  
Houston, TX 77079

Greg Garland  
Chairman and Chief Executive Officer  
Phillips 66  
3010 Briarpark Dr.  
Houston, TX 77042

John Watson  
Chairman and Chief Executive Officer  
Chevron Corporation  
6001 Bollinger Canyon Rd.  
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Marvin Odum  
President  
Shell Oil Company  
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Nelson Martinez  
President and Chief Executive Officer  
Citgo Petroleum Corporation  
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Robert Owens  
President and Chief Executive Officer  
Sunoco  
1735 Market St. Ste L1  
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Rex Tillerson  
Chairman and Chief Executive Officer  
Exxon Mobil Corporation  
5959 Las Colinas Blvd.  
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Joe Gorder  
President and Chief Executive Officer  
Valero Energy Corporation  
1 Valero Way  
San Antonio, TX 78249

Gary Heminger  
President and Chief Executive Officer  
Marathon Petroleum Corporation  
539 South Main St.  
Findlay, OH 45840

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


emergency room visits due to the ingestion of synthetic marijuana.  Dozens of overdoses and deaths have been linked to synthetic drugs. 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.

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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

Luther Strange
Alabama Attorney General

Mark Brnovich
Arizona Attorney General

Cynthia Coffman
Colorado Attorney General

George Jepsen
Connecticut Attorney General

Matthew P. Denn
Delaware Attorney General

Karl A. Racine
District of Columbia Attorney General

Samuel S. Olens
Georgia Attorney General

Russell Suzuki
Hawaii Attorney General (Acting)

Lawrence Wasden
Idaho Attorney General

Greg Zoeller
Indiana Attorney General
Tom Miller  
Iowa Attorney General

Jack Conway  
Kentucky Attorney General

Janet Mills  
Maine Attorney General

Maura Healey  
Massachusetts Attorney General

Lori Swanson  
Minnesota Attorney General

Chris Koster  
Missouri Attorney General

Douglas Peterson  
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Joseph Foster  
New Hampshire Attorney General

Derek Schmidt  
Kansas Attorney General

James “Buddy” Caldwell  
Louisiana Attorney General

Brian Frosh  
Maryland Attorney General

Bill Schuette  
Michigan Attorney General

Jim Hood  
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Tim Fox  
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Adam Paul Laxalt  
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Hector Balderas  
New Mexico Attorney General
Roy Cooper  
North Carolina Attorney General

Wayne Stenehjem  
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/s/
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Robert W. Ferguson  
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Patrick Morrisey  
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Brad Schimel  
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