



# Drug Trafficking Offenses

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Western District of Arkansas

June 11, 2025

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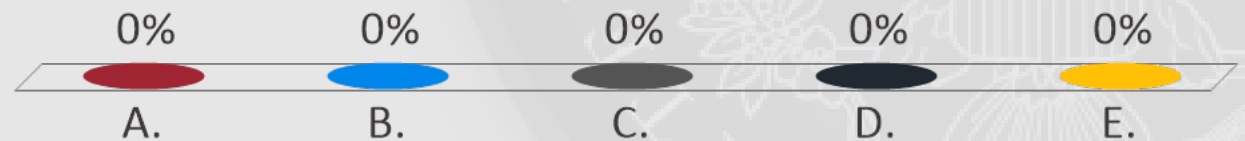
Office of Education and Sentencing Practice

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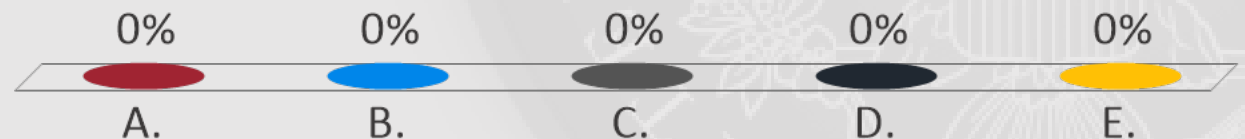
# How many drug trafficking cases have you handled?

- A. Zero**
- B. 1 to 10**
- C. 11 to 20**
- D. More than 20**
- E. I dream about drug cases**



**In the drug cases you handle, what drug type do you see most frequently?**

- A. Methamphetamine**
- B. Heroin**
- C. Fentanyl**
- D. Powder or Crack Cocaine**
- E. Other**



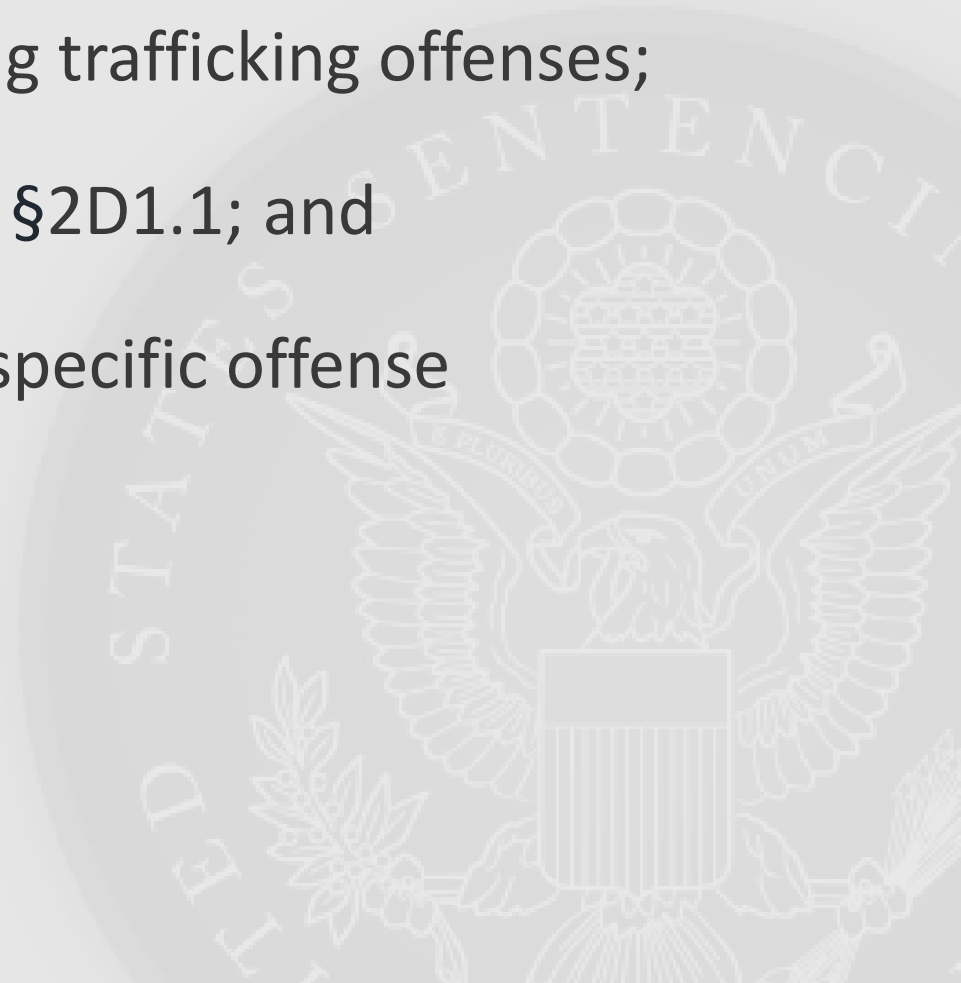
# Learning Objectives

**Your active engagement in this session will enable you to:**

**Apply** relevant conduct principles to drug trafficking offenses;

**Determine** the base offense level under §2D1.1; and

**Resolve** common application issues for specific offense characteristics under §2D1.1.



# Key Relevant Conduct Considerations

## Drug Offenses - Chapter 2D

**Jointly Undertaken Criminal Activity**

**Expanded Relevant Conduct**

**Relevant Conduct Exceptions**

# Key Relevant Conduct Considerations

## Drug Offenses - Chapter 2D

**Jointly Undertaken Criminal Activity**

**Expanded Relevant Conduct**

**Relevant Conduct Exceptions**

Avon, Stringer, D'Angelo, and Slim Charles, members of a Fayetteville street gang, were each convicted of conspiracy to distribute heroin.

At sentencing, the court applied the same §2D1.1 drug amount to all four men, reasoning that “once you’re a part of the conspiracy, then you can be held liable for the acts of the other co-conspirators throughout the duration of the conspiracy.”

**Did the district court apply the correct analysis?**

**A. Yes**

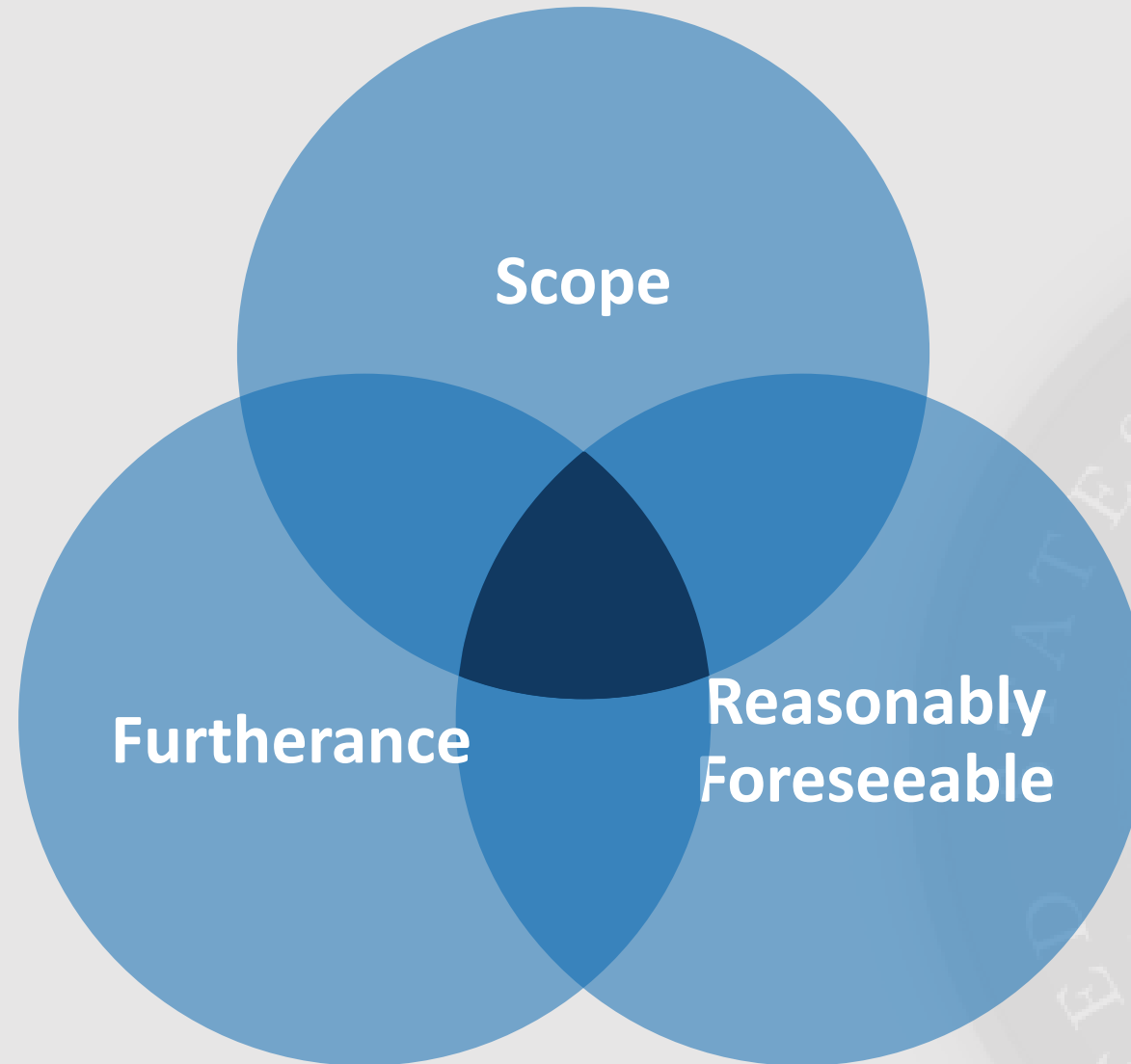
**B. No**





# Jointly Undertaken Criminal Activity

**Section 1B1.3(a)(1)(B)**



D'Angelo and Slim Charles sell heroin on the west side of the city, and Avon and Stringer sell heroin on the east side of the city. D'Angelo and Slim Charles are outspoken about only selling on the west side. They have no personal involvement in the east side sales and receive no portion of the profits from those sales.

**Should D'Angelo and Slim Charles be held accountable for Avon and Stringer's east side drug trafficking conduct?**

**A. Yes**

**B. No**



# Key Relevant Conduct Considerations

**Jointly Undertaken Criminal Activity**

**Expanded Relevant Conduct**

**Relevant Conduct Exceptions**

# List of Included Offenses

## Section 3D1.2(d)

Child Pornography Trafficking  
& Possession | §2G2.2

Firearms | §2K1.1

Fraud | §2B1.1

Migrant Smuggling | §2L1.1

Drugs | §2D1.1

Money Laundering | §2S1.1

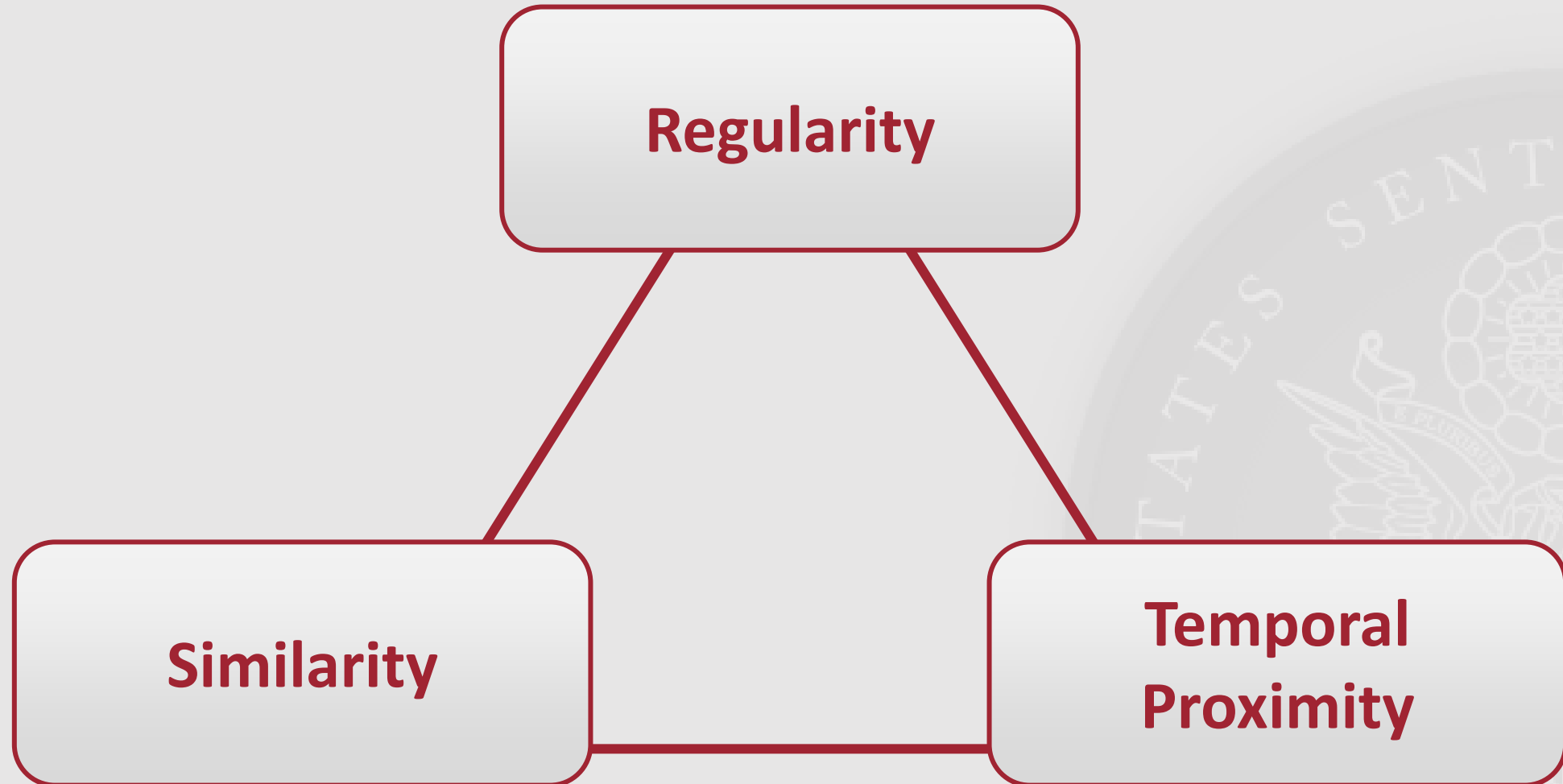
Bribery | §2C1.1

Tax Offenses | §2T1.1

Counterfeiting | §2B5.3

# Same Course of Conduct

Section 1B1.3(a)(2), App. Note 5(B)(ii)



Eleanor Shellstrop was convicted of conspiracy to distribute fentanyl. In the charged conspiracy, between 2019 and 2022, Ms. Shellstrop and her coconspirators, Tahini Al-Jamil and Chidi Anagoyne, purchased fentanyl from a supplier in Miami Beach, Florida, which they resold in Arkansas. In 2016, Ms. Shellstrop, Ms. Al-Jamil, and Mr. Anagoyne attempted to purchase fentanyl from an undercover agent in Miami Beach.

**Is the 2016 attempted purchase of fentanyl part of the same course of conduct as the charged conspiracy?**

- A. Likely Yes**
- B. Likely No**



# Common Scheme or Plan

Section 1B1.3(a)(2), App. Note 5(B)(i)

**Other Offense**



**Conviction**

**Victims**

**Accomplices**

**Purpose**

***Modus  
Operandi***

Consider again Eleanor Shellstrop. Ms. Shellstrop was convicted of conspiracy to distribute fentanyl. In the charged conspiracy, between 2019 and 2022, Ms. Shellstrop and her coconspirators, Tahini Al-Jamil and Chidi Anagoyne, purchased fentanyl from a supplier in Miami Beach, Florida, which they resold in Arkansas. In 2016, Ms. Shellstrop, Ms. Al-Jamil, and Mr. Anagoyne attempted to purchase fentanyl from an undercover agent in Miami Beach.

**Is the 2016 attempted purchase of fentanyl part of the same common scheme or plan as the charged conspiracy?**

- A. Likely Yes**
- B. Likely No**





# Key Relevant Conduct Considerations

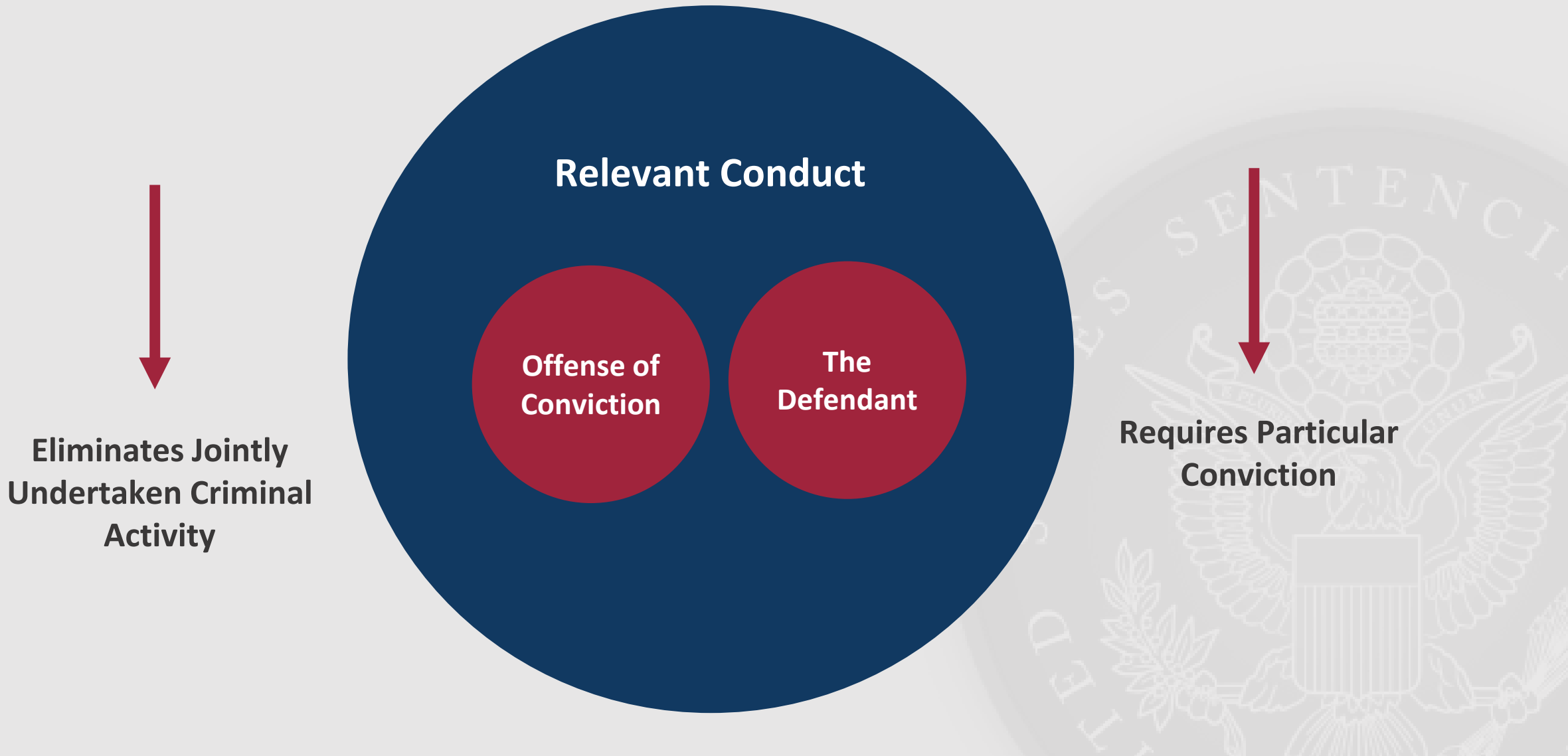
**Jointly Undertaken Criminal Activity**

**Expanded Relevant Conduct**

**Relevant Conduct Exceptions**

# Relevant Conduct Exceptions

## Section 1B1.3, Introductory Clause



# Relevant Conduct Exceptions

## Section 2D1.1

### Conviction Based

If the defendant is **convicted**  
under 21 U.S.C. § 865...

2

Levels

### Defendant Based

If the **defendant** used  
violence, made a credible  
threat to use violence, or  
directed the use of violence...

2

Levels

# Relevant Conduct Exceptions

## Section 2D1.1

### **Conviction-Based Exception** (Requires Specific Offense of Conviction)

§§2D1.1(a)(1)–(4)

§2D1.1(b)(6)

§2D1.1(b)(10)

§2D1.1(d)(2)

### **Defendant-Based Exception** (Eliminates Jointly Undertaken Activity)

§2D1.1(b)(2)

§2D1.1(b)(9)

§2D1.1(b)(11)

§2D1.1(b)(12)

# Key Relevant Conduct Considerations



**Jointly Undertaken Criminal Activity**



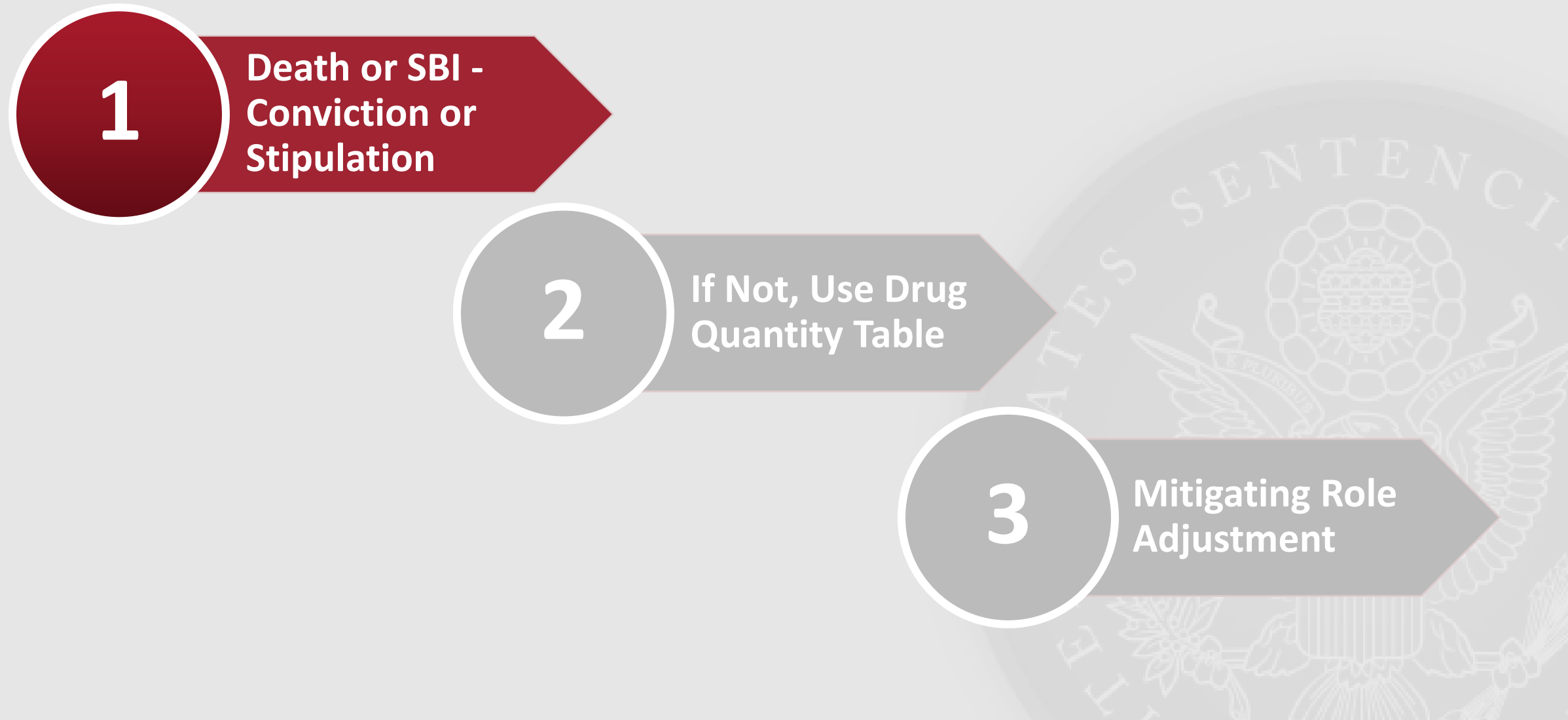
**Expanded Relevant Conduct**



**Relevant Conduct Exceptions**

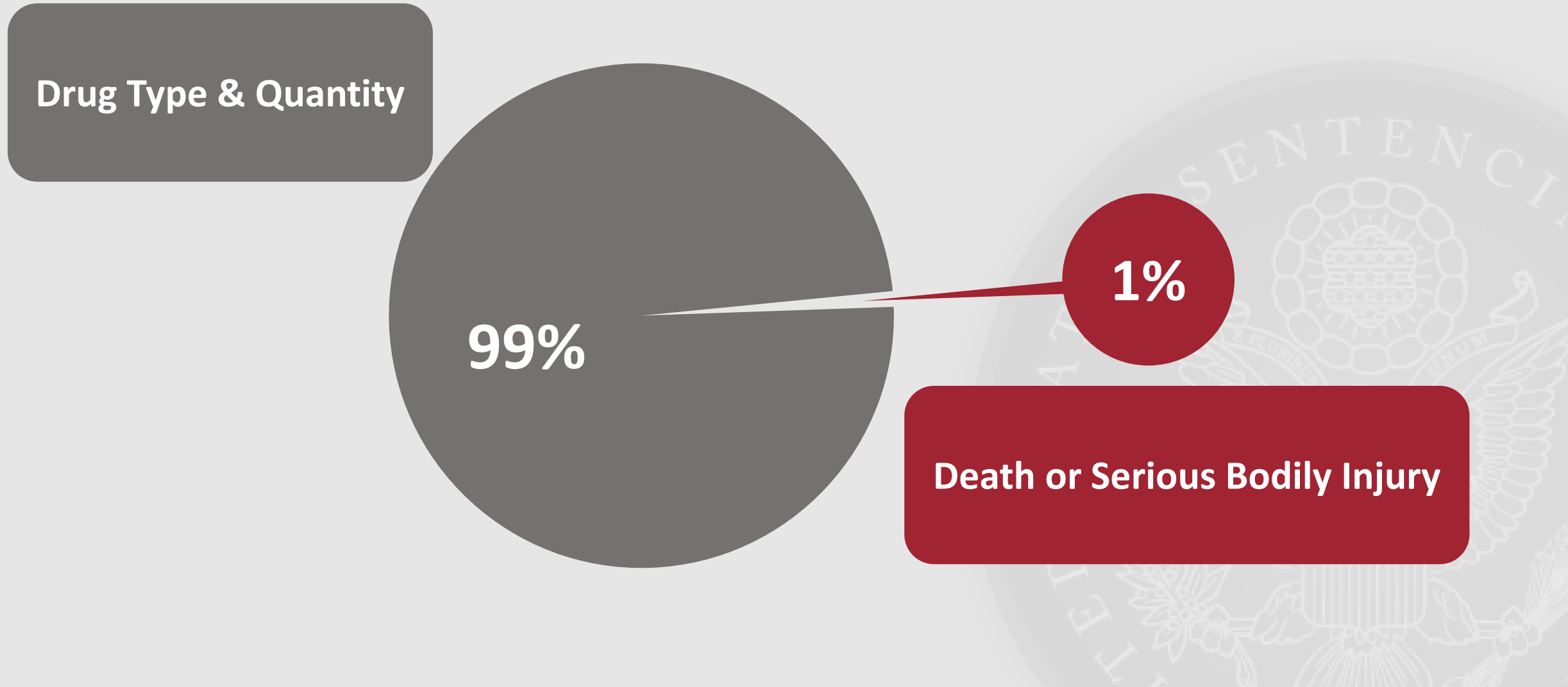
# Determining the Base Offense Level

## Section 2D1.1(a)



# Drug Trafficking: Base Offense Levels

## Two Calculation Methods



# Death or Serious Bodily Injury

Section 2D1.1(a)(1)-(4)

Offense of Conviction



or

Relevant Conduct  
(Actual Conduct)





# Death or Serious Bodily Injury

Section 2D1.1(a)(1)-(4)

Offense of Conviction



43

Statutory Minimum: Life

38

Statutory Minimum: 20 Years

30

Statutory Maximum: 30 Years

26

Statutory Maximum: 15 Years

# Stipulating to Death/SBI Offense Levels

Sections 1B1.2 and 2D1.1(a)(1)–(4)



If the **offense of conviction** does not establish death or serious bodily injury . . .



. . . the parties can **stipulate** to the higher base offense levels.

Benjamin Arellano pleaded guilty to one count of fentanyl distribution. The conviction did not establish death as an element, but the parties included the following stipulation in the plea agreement:

"The parties agree that Mr. Arellano sold fentanyl to Victim A, resulting in Victim A's fentanyl overdose and death. The parties agree that pursuant to §1B1.2(a), Mr. Arellano's guidelines will be calculated with a Base Offense Level of 38, although he is not subject to a mandatory term of 20 years' imprisonment."

**Does the BOL of 38 at §2D1.1(a)(2) apply in this case?**

**A. Yes**

**B. No**



# Determining the Base Offense Level

## Section 2D1.1(a)

1

Death or SBI  
Conviction or  
Stipulation

2

Drug Quantity  
Table

3

Mitigating Role  
Adjustment

# Determining the Base Offense Level

## Section 2D1.1(c) - Drug Quantity Table

(7)	<ul style="list-style-type: none"> <li>• At least 400 G but less than 700 G of Heroin;</li> <li>• At least 2 KG but less than 3.5 KG of Cocaine;</li> <li>• At least 112 G but less than 196 G of Cocaine Base,</li> <li>• At least 400 G but less than 700 G of PCP, or at least 40 G but less than 70 G of PCP (actual);</li> <li>• At least 200 G but less than 350 G of Methamphetamine, or at least 20 G but less than 35 G of Methamphetamine (actual), or at least 20 G but less than 35 G of 'Ice';</li> <li>• At least 200 G but less than 350 G of Amphetamine, or at least 20 G but less than 35 G of Amphetamine (actual);</li> <li>• At least 4 G but less than 7 G of LSD;</li> <li>• At least 160 G but less than 280 G of Fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] Propanamide);</li> <li>• At least 40 G but less than 70 G of a Fentanyl derivative;</li> <li>• At least 400 KG but less than 700 KG of Marijuana;</li> <li>• At least 80 KG but less than 140 KG of Hashish;</li> <li>• At least 8 KG but less than 14 KG of Hashish Oil;</li> <li>• At least 400,000 but less than 700,000 units of Ketamine;</li> <li>• At least 400,000 but less than 700,000 units of Schedule I or II Depressants;</li> <li>• At least 25,000 but less than 43,750 units of Flunitrazepam;</li> <li>• At least 400 KG but less than 700 KG of <i>Converted Drug Weight</i>.</li> </ul>	Level 26
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Drug Type

Drug Quantity

# Key Issues for Determining Drug Type

**Salts, Isomers, & Analogues**

**Fentanyl Analogues**

**Drug Conversion Table**

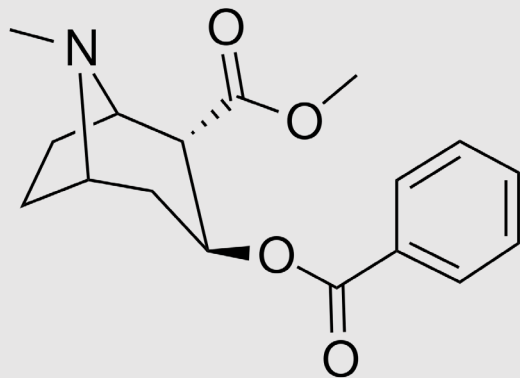
**Substances Not Listed**

**Mixtures**

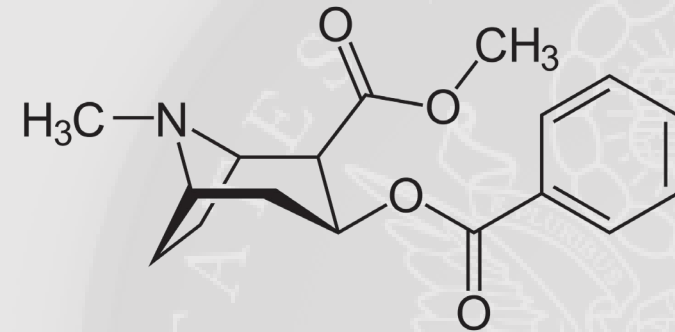
# Salts, Isomers, and Analogues

## Section 2D1.1, App. Note 6

Salts, isomers, salts of isomers, and analogues are treated as the similar controlled substance.



Pseudococaine

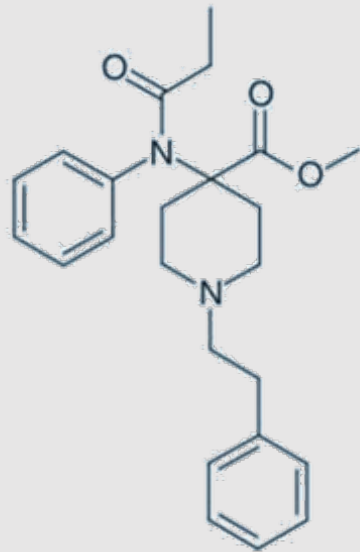


Cocaine

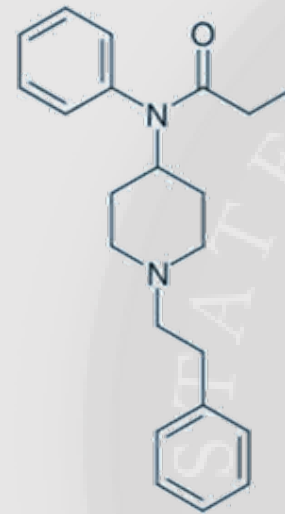
# Fentanyl Analogues

## Section 2D1.1(c) - Drug Quantity Table, Note (J)

“Fentanyl analogue” has its own definition and is listed separately in the Drug Quantity Table.



Carfentanil (45)



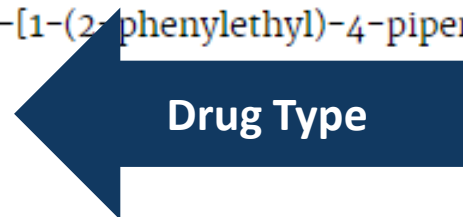
Fentanyl (6)



# Fentanyl Analogues

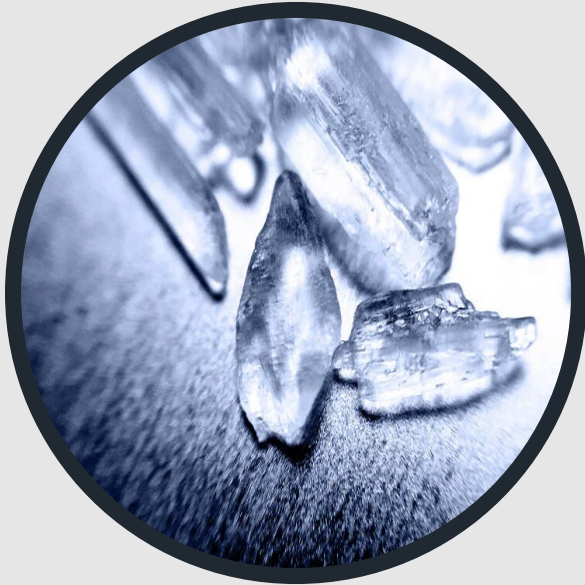
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# Other Specific Definitions

## Section 2D1.1(c) - Drug Quantity Table



**Ice**

Note (C)



**Crack**

Note (D)



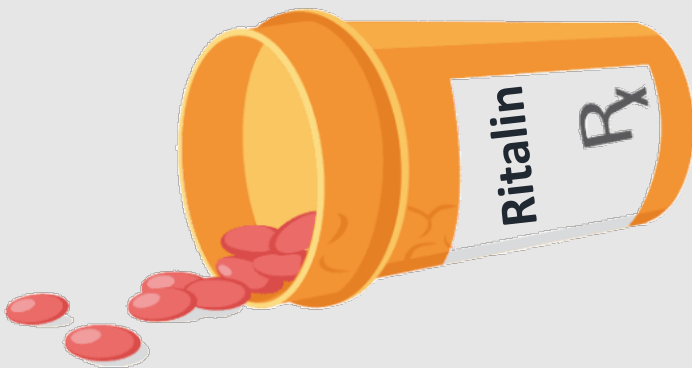
**Hashish Oil**

Note (I)

# Use of Drug Conversion Tables

## Section 2D1.1, App. Note 8

Not on Drug Quantity Table?  
Use Drug Conversion Tables



Cocaine and Other Schedule I and II Stimulants (and their immediate precursors)*	CONVERTED DRUG WEIGHT
1 gm of Cocaine =	200 gm
1 gm of N-Ethylamphetamine =	80 gm
1 gm of Fenethylamine =	40 gm
1 gm of Amphetamine =	2 kg
1 gm of Amphetamine (Actual) =	20 kg
1 gm of Methamphetamine =	2 kg
1 gm of Methamphetamine (Actual) =	20 kg
1 gm of 'Ice' =	20 kg
1 gm of Khat =	.01 gm
1 gm of 4-Methylaminorex ('Euphoria') =	100 gm
1 gm of Methylphenidate (Ritalin) =	100 gm
1 gm of Phenmetrazine =	80 gm
1 gm Phenylacetone/P2P (when possessed for the purpose of manufacturing methamphetamine) =	416 gm
1 gm Phenylacetone/P2P (in any other case) =	75 gm
1 gm Cocaine Base ('Crack') =	3,571 gm
1 gm of Aminorex =	100 gm
1 gm of N-N-Dimethylamphetamine =	40 gm
1 gm of N-Benzylpiperazine =	100 gm

# Quantity: Converted Drug Weight

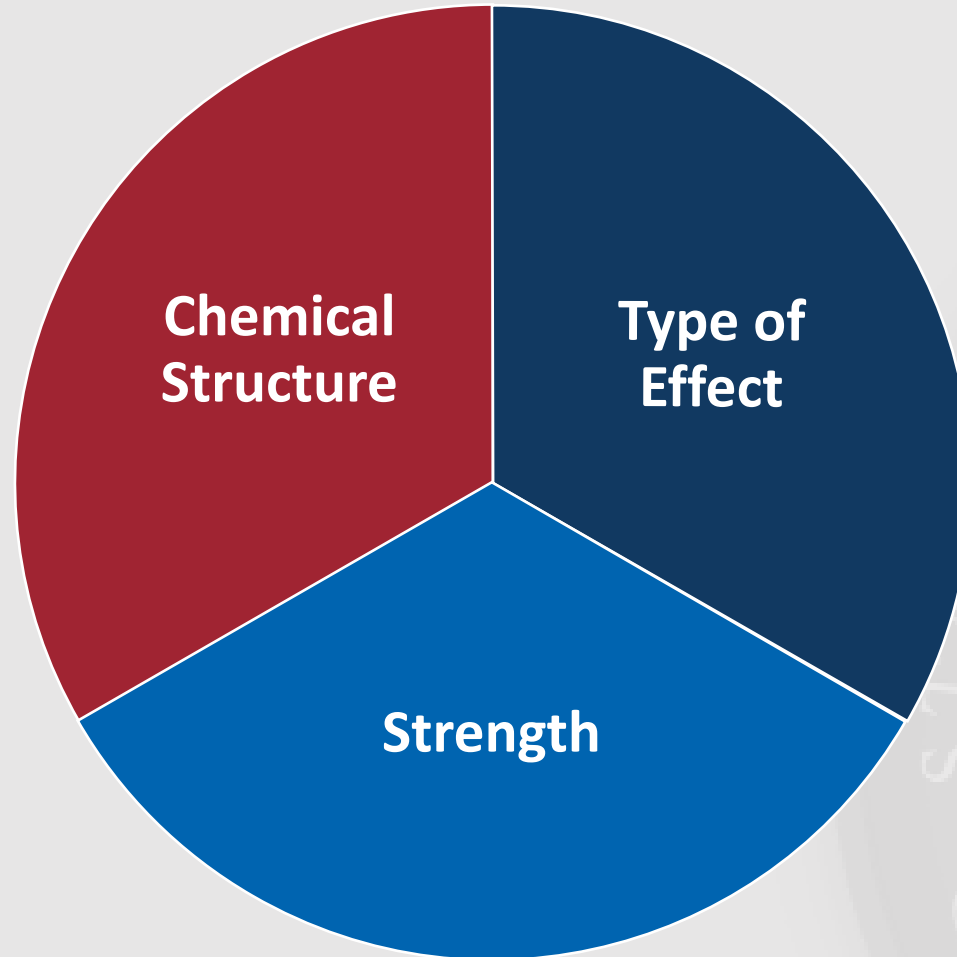
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Drug Type

# Substances Not Referenced

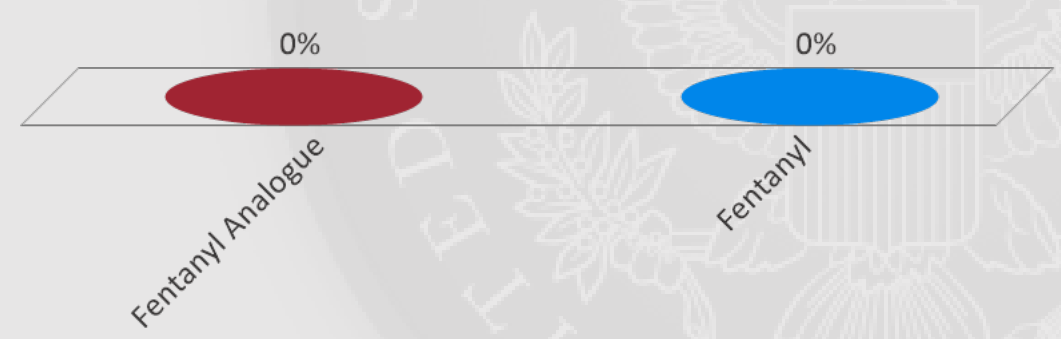
Section 2D1.1, App. Note 6



Skinny Pete is convicted of one count of distribution of Albuquerqueitazine, a fentanyl analogue.

**Which controlled substance should you use to determine the BOL on the Drug Quantity Table?**

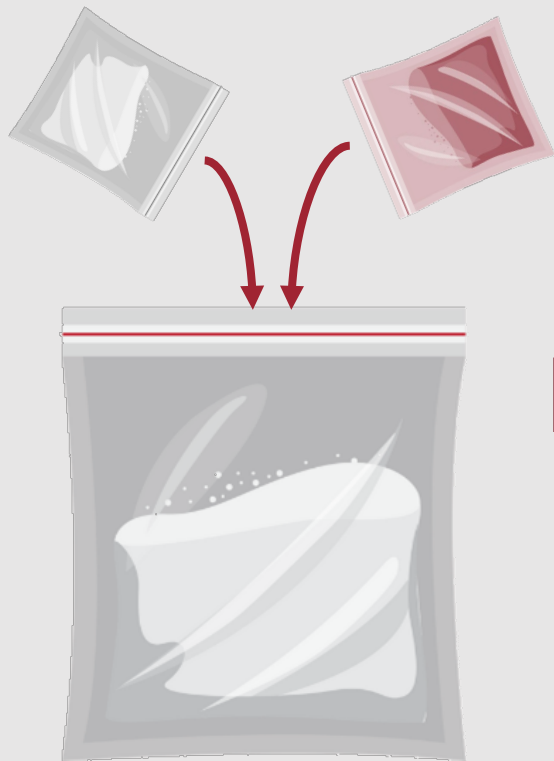
- A. Fentanyl Analogue**
- B. Fentanyl**



# Mixtures

## Section 2D1.1(c) - Drug Quantity Table, Note (A)

If a mixture contains more than one controlled substance, use controlled substance that results in the **greater** offense level.

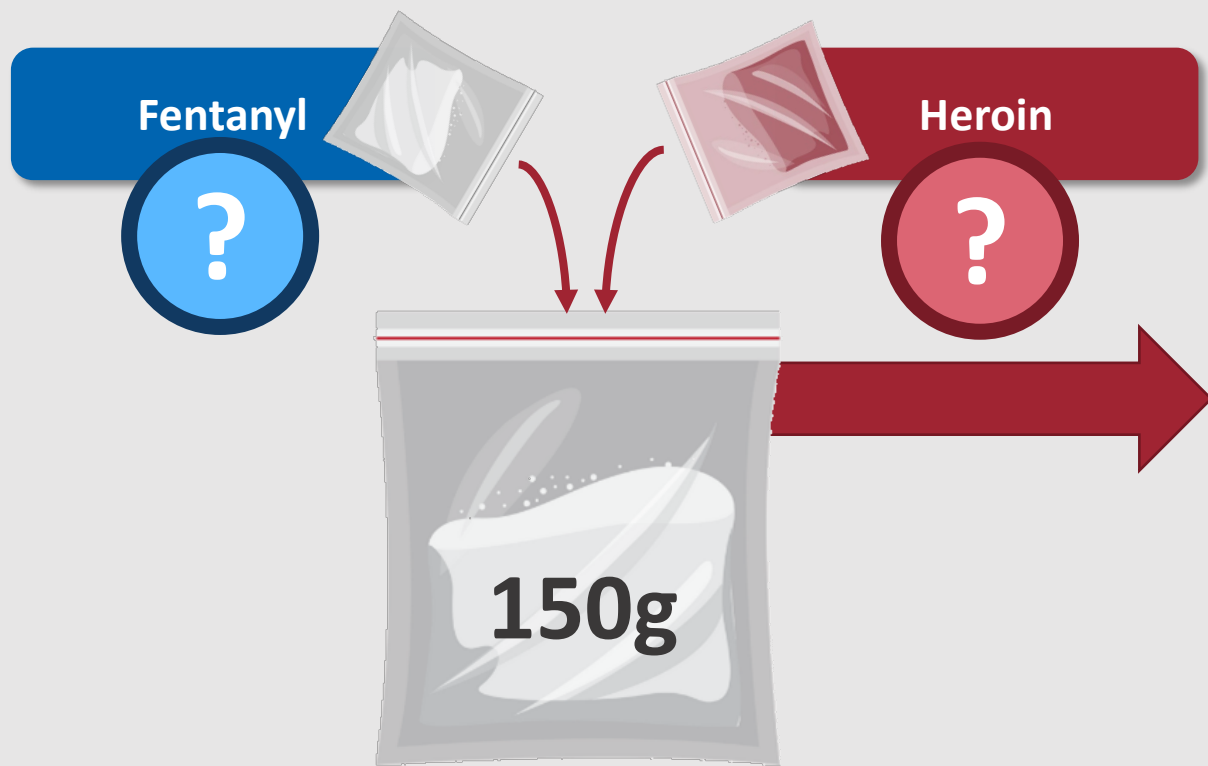


**Use Most  
Serious  
Drug**



# Mixtures

## Note (A) to Drug Quantity Table





# Mixtures

## Note (A) to Drug Quantity Table



Fentanyl

150g

# Key Issues for Drug Type



**Salts, Isomers, & Analogues**



**Fentanyl Analogues**



**Drug Conversion Table**



**Substances Not Listed**



**Mixtures**



# Determining the Base Offense Level

## Section 2D1.1(c) - Drug Quantity Table

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Drug Type

Drug Quantity

# Key Issues for Drug Quantity

**Weight of Mixtures**

**Actual Weight**

**Multiple Drug Types**

**Minimum BOLs + Maximum Converted Drug Weights**

# Weight of Mixtures

## Section 2D1.1(c) - Drug Quantity Table, Note (A)



**Mixture Weight: 100 gm**  
**Purity: 80% Cocaine**  
**Actual Weight: 80 gm**

**Use Mixture  
Weight, Not Actual  
Weight\***

*\*Unless otherwise specified*

# Weight of Mixtures

## Section 2D1.1, App. Note 3

**Exclude** materials that must be separated before use.



Baggie Not Counted



# Actual Weight (Purity)

Section 2D1.1(c) - Drug Quantity Table, Notes (B) & (C)

**Hydrocodone**

**Oxycodone**

**Use Actual Weight**

**PCP**

**Amphetamine**

**Greater of  
Actual or Mixture**

**Methamphetamine**

**Ice, Actual, or Mixture**

# Actual Weight (Purity)

## Section 2D1.1(c) - Drug Quantity Table, Notes (B) & (C)

Hydrocodone

Oxycodone

Use Actual Weight

PCP

Amphetamine

Greater of  
Actual or Mixture

Methamphetamine

Ice, Actual, or Mixture



# Calculating Offense Levels for Meth Cases

## Section 2D1.1(c) - Drug Quantity Table, Notes (B) & (C)

If substance is...	Classify as...	Calculate BOL by...
d-methamphetamine hydrochloride $\geq 80\%$ purity	Ice	Mixture Weight
$\geq 10\%$ purity (not ice)	Methamphetamine (Actual)	Mixture Weight x Purity
$\leq 10\%$ or unknown purity	Methamphetamine	Mixture Weight

Clay Morrow is convicted of distribution of 50 grams of methamphetamine.

His relevant conduct involves the sale of a one 1-kilogram package that contained 975 grams of d-methamphetamine hydrochloride at 95% purity.

**What drug type and weight is used to determine the BOL in the Drug Quantity Table at §2D1.1?**

- A. 1kg Meth (Actual)**
- B. 1kg Ice**
- C. 975g Meth (Actual)**
- D. 975g Ice**



# Methamphetamine Report

June 2024



## Key Findings:

- Meth is highly and uniformly pure – avg. 93.2%
- Sentences imposed are impacted by local laboratory testing practices, which vary nationally
- Production of meth has shifted outside the US

# Multiple Drug Types

## Section 2D1.1, App. Note 7


Where there are multiple drug types, the quantities of drugs are to be added using the Drug Conversion Tables.



**Converted  
Drug  
Weight**

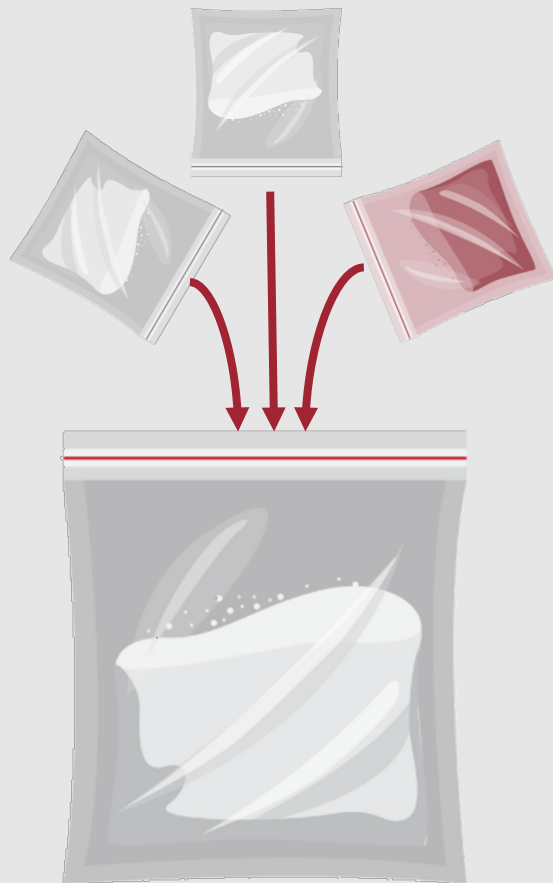
Grey Larson is convicted of one count of distribution of heroin. His relevant conduct is limited to the delivery of 14 grams of powder containing a mixture of heroin (11 grams), fentanyl (2 grams), and carfentanil (a fentanyl analogue) (1 gram).

**Which controlled substance should you use in determining his base offense level under the Drug Quantity Table?**

- A. Heroin**
- B. Fentanyl**
-  **C. Fentanyl Analogue**
- D. Converted Drug Weight**



# Mixture Scenario



Mixture Weight	Controlled Substance	Base Offense Level
14 grams	Heroin	14
14 grams	Fentanyl	16
14 grams	Fentanyl Analogue (Carfentanil)	24

# Multiple Drug Types Scenario

Elmer Murray was arrested and charged with possession with intent to distribute 3 grams heroin sold to an undercover officer on June 11, 2023. During a search of Mr. Murray's car at the time of his arrest, officers located an additional 1 kilogram of marijuana. The court finds the marijuana is relevant conduct.



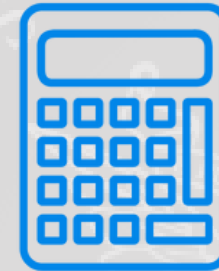
1 kg marijuana

8



3 g heroin

12



Converted  
drug weight = 4 kg

10

Base Offense  
Level

# Multiple Drug Types Scenario

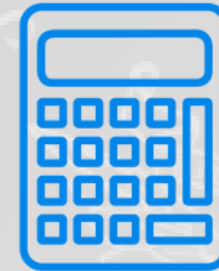
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1 kg marijuana



3 g heroin



Converted  
drug weight = 4 kg

*\*Provided, that the minimum offense level from the Drug Quantity Table for any of these controlled substances individually, or in combination with another controlled substance, is level 12.*



# Drug Conversion Tables – Minimum BOLs and Maximum Weights

Section 2D1.1, App. Notes 8(B) & (D)

Drug Schedules	BOL Minimum	CDW Maximum
Schedule I	12	None
Schedule II	12	None
Combined Schedules III, IV, and V	6	79.99 kg
Combined Schedules IV and V	6	9.99 kg
Schedule V	6	2.49 kg

# Drug Conversion Calculator

[guidelines.ussc.gov](https://guidelines.ussc.gov)

Use the Drug Conversion Calculator to convert the quantity of up to three controlled substances at the same time to its converted drug weight. Results will also display the offense level that corresponds to this converted drug weight in the Drug Quantity Table at §2D1.1(c). For certain controlled substances, the Drug Conversion Tables at §2D1.1 set minimum base offense levels in the Drug Quantity Table. Similarly, the converted drug weights assigned in the Drug Conversion Tables for certain controlled substances are “capped” at specified amounts. The resulting calculations in the Drug Conversion Calculator already consider such minimum base offense levels and “caps.”

SUBSTANCE 1

Select Substance



Enter Weight

SUBSTANCE 2

Select Substance



Enter Weight

SUBSTANCE 3

Select Substance



Enter Weight

Submit

# Key Issues for Drug Quantity



**Weight of Mixtures**



**Actual Weight**



**Multiple Drug Types**



**Minimum BOLs + Maximum Converted Drug Weights**

# Evidentiary Issues

**Estimating Drug Type and Quantity**

**Monetary Seizures**

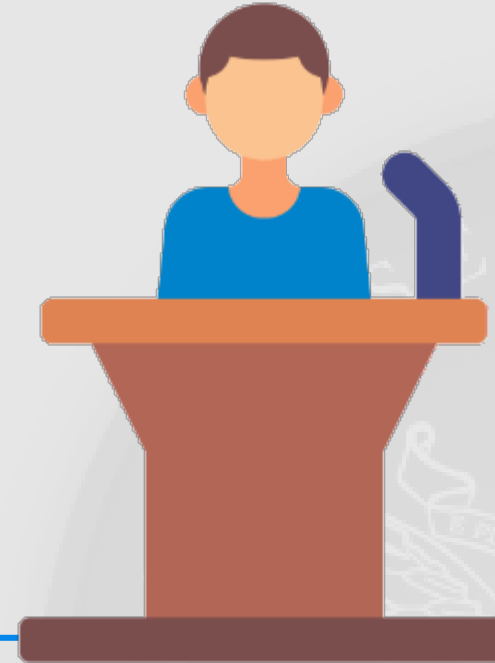
**Agreements to Sell**

# Determining Drug Types and Quantities

## Section 2D1.1, App. Note 5



Lab report is generally not required.

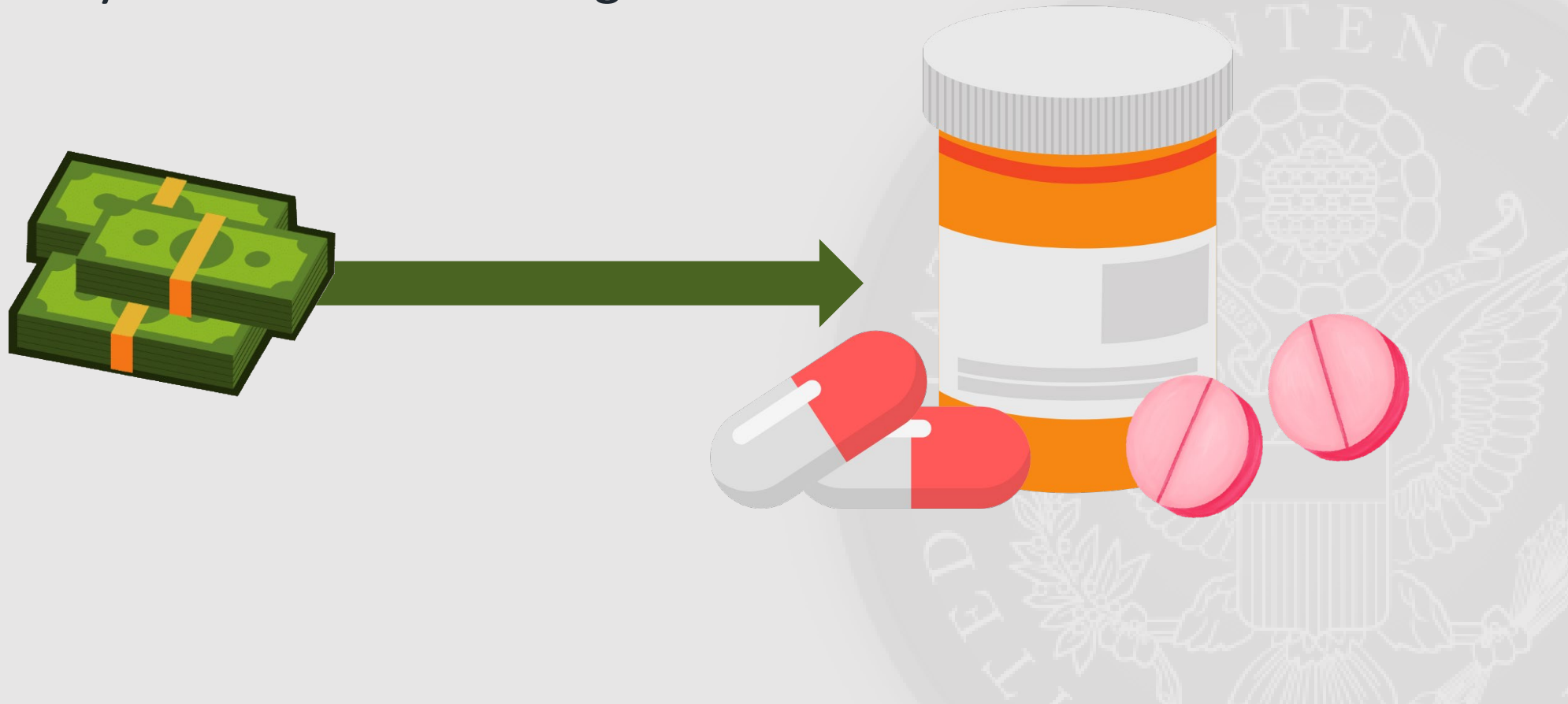


Court may estimate drug type and quantity based on any reliable evidence.

# Evidentiary Issues: Currency

## Section 2D1.1 , App. Note 5

The court may convert cash to drugs.

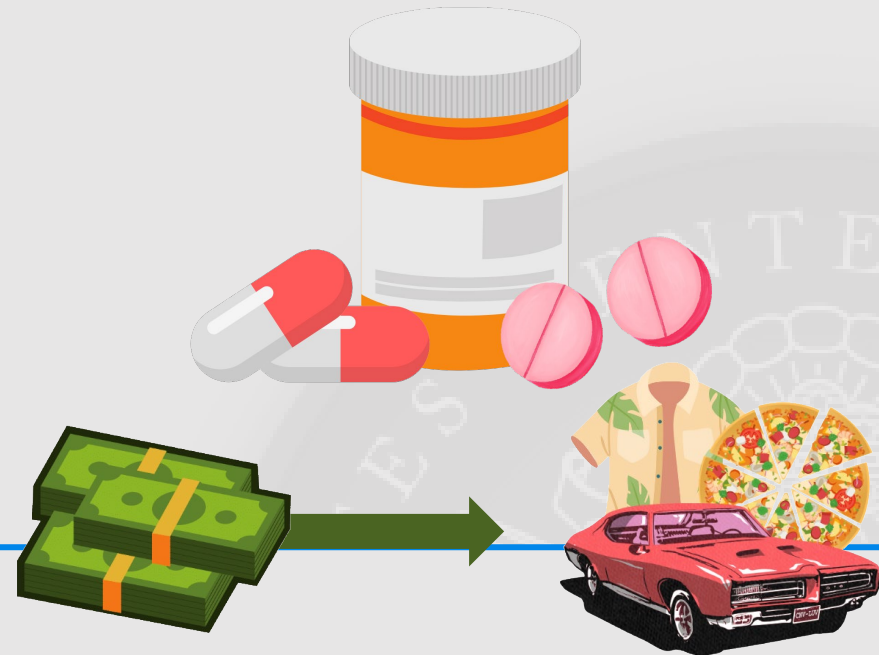


# Evidentiary Issues: Currency

Section 2D1.1 , App. Note 5



Not All Cash is Drug Proceeds.



Don't Assume Drug Proceeds Will  
Buy More Drugs

# Agreements to Sell

## Section 2D1.1, App. Note 5

In the case of an agreement to sell,  
use the amount of the agreement. . .



...unless the sale is completed and more  
accurately reflects the scale of the offense.



# Agreements to Sell

Section 2D1.1, App. Note 5



**Use Agreement, Not  
Completed Sale**



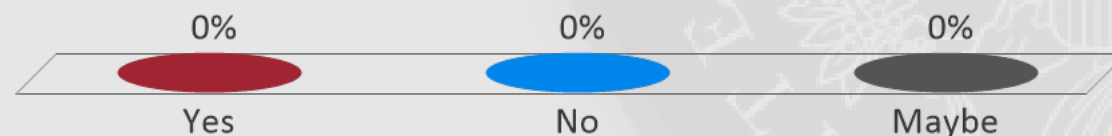
**Use Amount Defendant  
Intended to or Capable  
of Providing**

Stringer Bell was convicted of possession with intent to distribute cocaine. In addition to selling drugs, Mr. Bell also operated a bar.

During a search of his home after his arrest, officers located \$100,000 in cash in a safe in his home office.

**Should the \$100,000 in cash be converted to drug weight to calculate the BOL at §2D1.1?**

- A. Yes**
- B. No**
- C. Maybe**



# Evidentiary Issues



**Estimating Drug Type and Quantity**



**Monetary Seizures**



**Agreements to Sell**

# Determining the Base Offense Level

## Section 2D1.1(a)

1

Conviction  
Involves Death  
or SBI

2

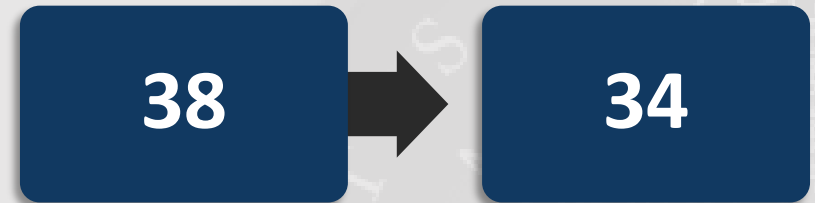
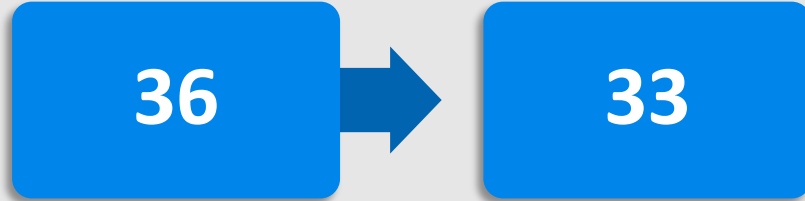
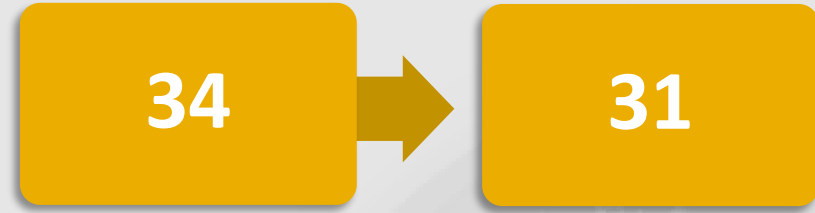
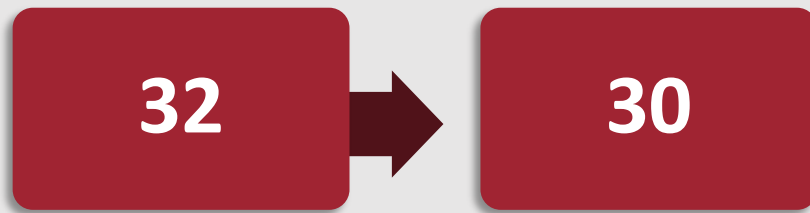
Drug Quantity  
Table

3

Mitigating Role  
Adjustment

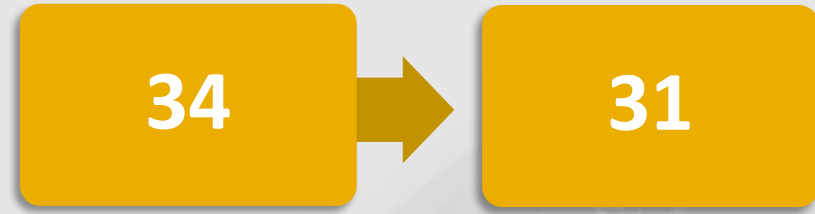
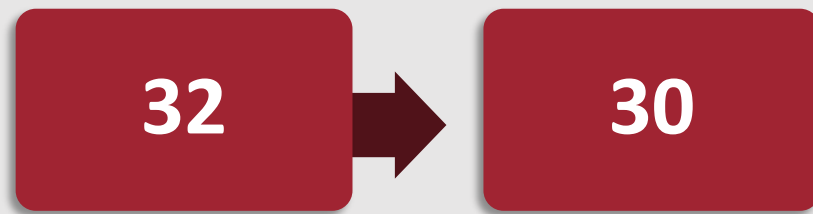
# Adjusting the BOL for Mitigating Role

Section 2D1.1(a)(5)



# Adjusting the BOL for Mitigating Role

Section 2D1.1(a)(5)



Promulgated §2D1.1(a)(5)



Apply  
BOL Reduction  
and  
§3B1.2  
Adjustment

# Commonly Applied SOC

Section 2D1.1(b)(1), (b)(12), (b)(13), & (b)(18)

**Weapon Enhancement**

**Premises Enhancement**

**Safety Valve Reduction**

**Fentanyl Enhancement**

# Dangerous Weapon Enhancement

Section 2D1.1(b)(1) & App. Note 11(A)

IO

A dangerous weapon (including a firearm) was possessed

1

Government proves that  
the **weapon** and **drugs**  
are present

2

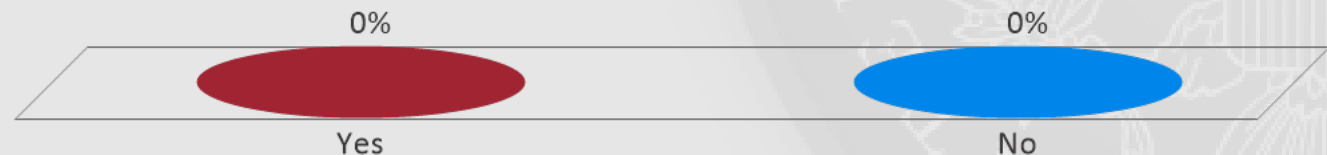
SOC applies unless  
defendant can prove  
“**clearly improbable.**”



Juan Carlos “Juice” Ortiz pleaded guilty to drug trafficking, related to a series of controlled purchases conducted in the parking lot outside of a Walmart. During one sale, Mr. Ortiz was accompanied by a friend, who agreed to act as “muscle” during the sale and carried a loaded firearm in his waistband.

**Does the 2-level weapons enhancement under §2D1.1(b)(1) apply?**

- A. Yes**
- B. No**



# Drug Trafficking: Premises Enhancement

**Section 2D1.1(b)(12)**



**P IO**

**Defendant Maintained a Premises for the Purpose of  
Manufacturing or Distributing a Controlled Substance**

**Defendant**

**Maintained**

**Purpose**

# Drug Trafficking: Premises Enhancement

Section 2D1.1(b)(12), App. Note 17



## Maintained

Possessory Interest  
(*e.g.*, Owned, Rented)

Control of the Premises



## Purpose

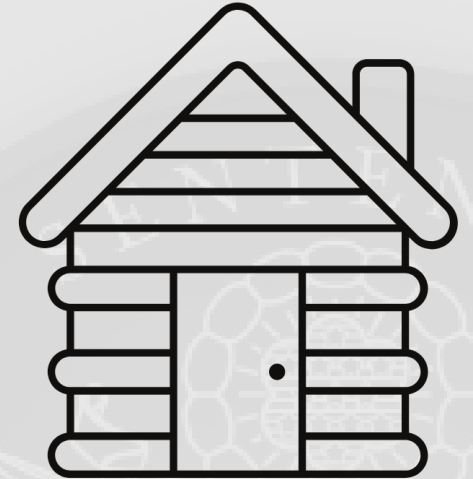
Need Not be Sole Purpose

Compare Frequency – Drug  
Trafficking v. Lawful Purpose

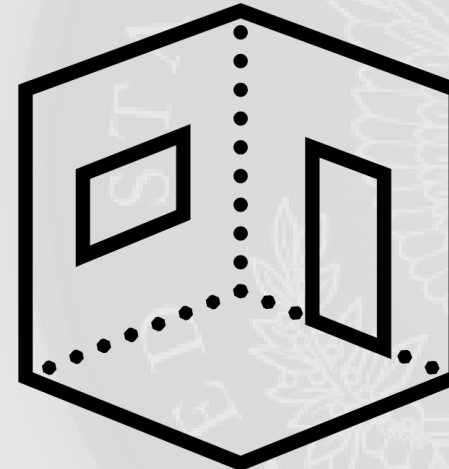
# What is a Premises?

Section 2D1.1(b)(12) & App. Note 17

**Building**



**Room**



**Enclosure**

Jesse Pinkman was arrested and charged with possession with intent to distribute methamphetamine. Phone calls, text messages, and surveillance showed that Mr. Pinkman repeatedly used his Winnebago recreational vehicle, where he lived, to cook, package, store, and distribute methamphetamine at a local campground.

**Will the enhancement for maintaining a drug premises under §2D1.1(b)(12) apply?**

- A. Probably**
- B. Probably Not**



# Guidelines Safety Valve

Section 2D1.1(b)(18)

**2**

Levels

If the defendant meets the  
criteria in §5C1.2(a)(1)–(5)



# Safety Valve Criteria

## Section 5C1.2(a)(1)

(1)

Limited  
Criminal  
History

(2)

Defendant Did  
Not Use  
Dangerous  
Weapon  
or Violence

(3)

Offense Did  
Not Result in  
Death or  
Serious Bodily  
Injury

(4)

No Leadership  
Role

(5)

Safety Valve  
Proffer

# Limited Criminal History

## Section 5C1.2(a)(1)(A)–(C)

(1)

Defendant Does Not Have Any of the Following:

Limited  
Criminal  
History

**+4**

Criminal  
History Points\*

**+3**

Point Offense

**+2**

Point Violent  
Offense

\*excluding any criminal history points resulting from a 1-point offense



# Safety Valve Criteria

## Section 5C1.2(a)(1)

(1)

Limited  
Criminal  
History

(2)

**Defendant Did  
Not Use  
Dangerous  
Weapon  
or Violence**

(3)

Offense Did  
Not Result in  
Death or  
Serious Bodily  
Injury

(4)

No Leadership  
Role

(5)

Safety Valve  
Proffer

Recall “Juice” Ortiz. Mr. Ortiz was accompanied by a friend on a drug sale. That friend agreed to act as “muscle” during the sale and carried a loaded firearm in his waistband. Mr. Ortiz was assessed a 2-level enhancement at §2D1.1(b)(1) because a firearm or dangerous weapon was possessed.

**Is Mr. Ortiz automatically excluded from the 2-level reduction at §2D1.1(b)(18)?**

**A. Yes**

**B. No**



# Remember - Relevant Conduct Exceptions

**§2D1.1(b)(1)**

Offense-Based



**§5C1.2(a)(2)**

Defendant-Based

# Fentanyl and Fentanyl Analogue Enhancements

## Section 2D1.1(b)(13)

Defendant

knowingly misrepresented or knowingly marketed as another substance

+4

represented or marketed as a  
legitimately manufactured drug

&

willful blindness or  
conscious avoidance of knowledge

+2

# Fentanyl and Fentanyl Analogue Enhancements

## Section 2D1.1(b)(13)

Defendant

knowingly misrepresented or knowingly marketed as another substance

+4

represented or marketed as a  
legitimately manufactured drug

&

reckless disregard

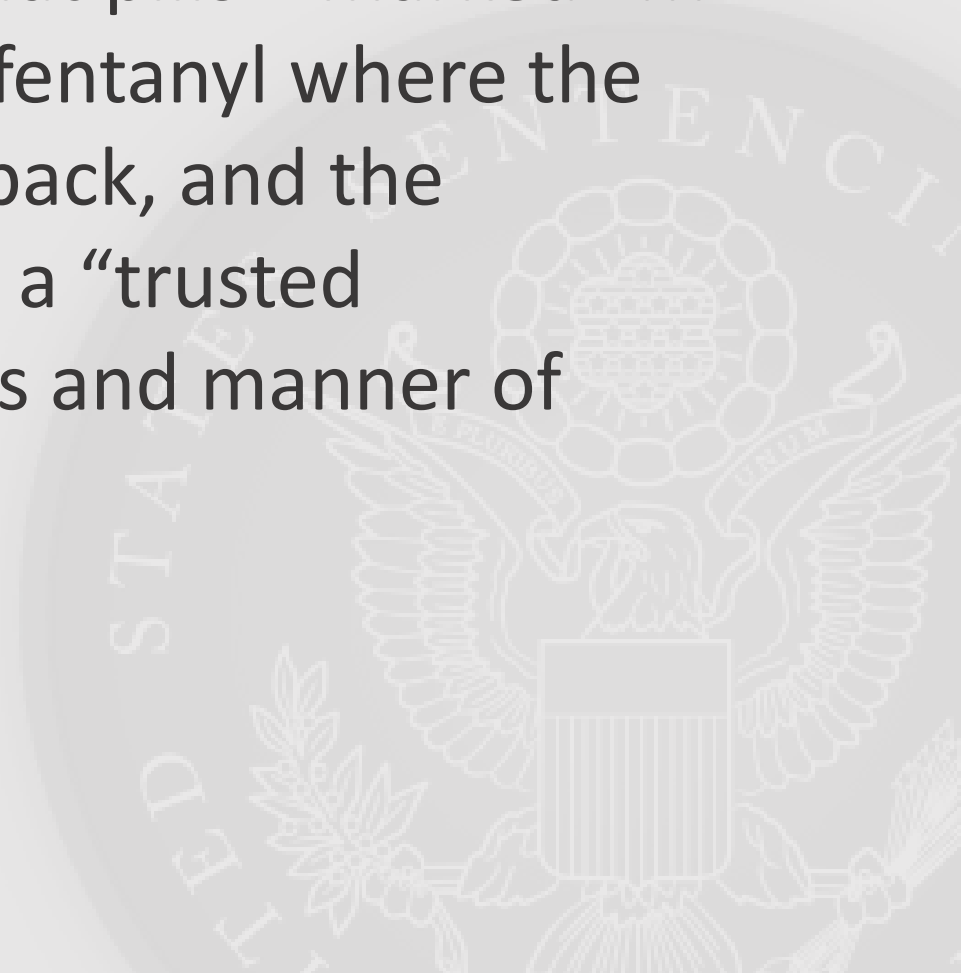
+2

Promulgated

# *United States v. Salinas*

**132 F.4th 1083 (8th Cir. 2025)**

Defendant acted with willful blindness that pills—marked “M-30” to resemble oxycodone—contained fentanyl where the pills were found in the defendant’s backpack, and the defendant was “not a ‘typical mule’” but a “trusted distributor” based on the quantity of pills and manner of transportation.



# Commonly Applied SOC's

Section 2D1.1(b)(1), (b)(12), (b)(13), & (b)(18)



**Weapon Enhancement**



**Premises Enhancement**



**Safety Valve Reduction**



**Fentanyl Enhancement**

# Please Review Our Session





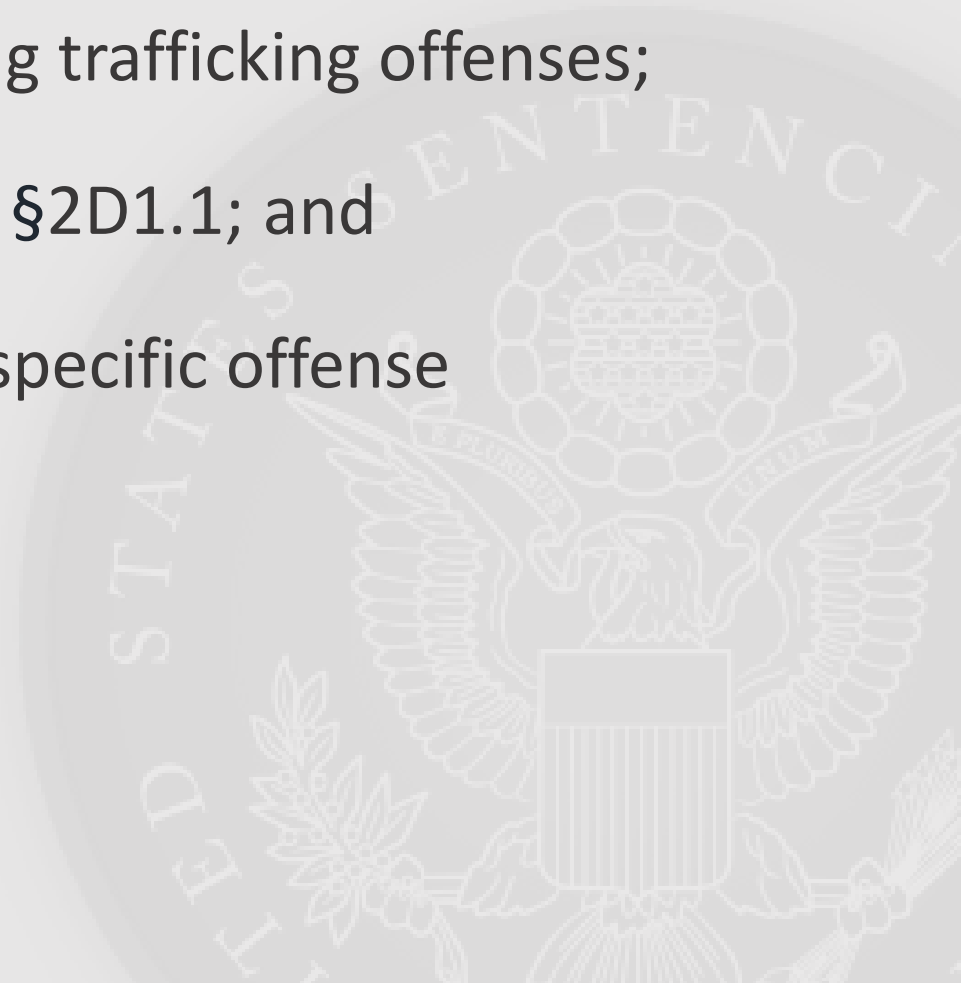
# Learning Outcomes

**You should now be able to:**

**Apply** relevant conduct principles to drug trafficking offenses;

**Determine** the base offense level under §2D1.1; and

**Resolve** common application issues for specific offense characteristics under §2D1.1.



# Questions?



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