

United States Senate

October 28, 2025

The Honorable Terrence C. Cole
Administrator
U.S. Drug Enforcement Administration
8701 Morrisette Drive
Springfield, VA 22152

Dear Administrator Cole,

I write to recommend that the Drug Enforcement Agency (DEA) take action to emergency schedule 7-hydroxymitragynine (7-OH) and related products as Schedule I controlled substances. The pseudoindoxyl metabolite of 7-OH (7-OHS), along with the compounds MGM-15 and MGM-16, are being falsely marketed as “kratom extracts.” These substances pose significant dangers to consumers, as 7-OH is approximately 13 times more potent than morphine. This regulatory gap blurs the distinction between a natural botanical product and a dangerous synthetic drug.

Naturally occurring kratom (*Mitragyna speciosa*) leaf contains only trace amounts of 7-OH – typically around 0.02% to 0.08% of the leaf’s content. In contrast, synthetic 7-OH products are chemically concentrated to far higher levels – often 98% or more of total alkaloids – representing an artificial potency increase of several hundredfold.¹ These products are adulterated chemical analogues engineered to deliver intense opioid-like effects that no natural Kratom product could produce.

By exploiting regulatory gaps and flooding communities with synthetic compounds, the manufacturers of these substances are contributing to a potential fourth wave of the opioid epidemic. Marketed as “natural” supplements despite their high addiction potential, these substances are dangerously operating in an unregulated market.

I ask the DEA to consider taking the following action:

¹ Matsumoto, K., Horie, S., Ishikawa, H., Takayama, H., Aimi, N., Ponglux, D., & Watanabe, K. (2003). *Antinociceptive effect of 7-hydroxymitragynine in mice: Discovery of an orally active opioid analgesic from the Thai medicinal herb Mitragyna speciosa*. Science Direct. <https://www.uthscsa.edu/art/AddictionJC/7-hydroxymitragynineantinociception.pdf>.

1. **Emergency Scheduling:** Fast-track controlled substance scheduling for 7-OH, 7-OHS, MGM-15, MGM-16, and similar synthetic derivatives.
2. **Proactive Enforcement:** Strengthen oversight to block new synthetic derivatives from reaching the market.

The DEA has the authority under the Controlled Substances Act and the Federal Food, Drug, and Cosmetic Act to act swiftly by temporarily scheduling 7-hydroxymitragynine products and their analogues. Delaying action risks the proliferation of distribution networks and more victims.

Congress stands ready to provide legislative support, appropriations, or oversight. I urge you to act decisively to eliminate these dangerous synthetics while preserving legitimate commerce. The time to prevent this crisis is now.

Thank you for your dedication. I look forward to collaborating to address this urgent threat.

Sincerely,

A handwritten signature in black ink that reads "Roger W. Marshall". The signature is written in a cursive, flowing style.

Roger Marshall, M.D.
United States Senator