



Written testimony of Dr. Michele Ross
Advisor, 7-HOPE Alliance Foundation
RE: SB25 072

April 29, 2025

Mr. Chairman and members of the House Finance committee,

Good morning. My name is Dr. Michele Ross, and I am an Advisor at the 7-HOPE Alliance Foundation, a national, nonpartisan, non-profit organization focused on research, education, and advocacy for users of kratom leaf and kratom leaf-derived products such as 7-hydroxymitragynine, abbreviated as 7-OH.

I am providing testimony in **OPPOSITION of SB 072 unless the language in SB 072 is STRIKEN banning kratom products that have over 2% of 7-hydroxymitragynine content as well as the ban on semi-synthesized or synthesized kratom products.**

I voice these concerns not only as a former resident of Denver, Colorado, but as someone who continues to educate and consult chronic pain patients in Colorado and throughout the United States via online harm reduction coaching, courses, and books.

I am one of the leading experts on kratom and kratom alkaloids such as 7-OH. I authored the book "*Kratom is Medicine*" in 2021. I am a neuropharmacologist with a PhD in Neuroscience (2008) and my work has focused on drug addiction. I have consulted companies, healthcare professionals, and consumers on kratom and plant-based products such as cannabis for over 13 years, and am the CEO of Infused Partners.

7-OH products are a subdivision of kratom products that should be subjected to the same rigorous safety, testing, and labeling requirements as whole leaf kratom products, rather than simply banned. 7-OH products offer many benefits to consumers when manufactured safely and used responsibly. To ban 7-OH products while leaving kratom whole leaf products and kratom extracts on the market simply does not make sense.

I'd like to share my personal story using kratom and specifically 7-OH products today. I have suffered with extreme chronic pain every day of my life since 2014. I was diagnosed with fibromyalgia and peripheral neuropathy, and started taking natural products including kratom leaf powder to manage pain and fight fatigue. Over the years I beat cancer and had additional health issues and my pain increased. After having discovered 7-OH, I was able to stop using my

cane and take on more work hours because I was able to function without excruciating pain, and I wasn't drowsy. It has improved the quality of my life substantially.

But I'm not the only one who has benefited from 7-OH. In addition, The 7-Hope Alliance has hundreds of testimonials from 7-OH users who have benefited from using 7-OH products, ranging from pain relief, recovery from substance abuse of more dangerous drugs such as heroin, fentanyl, or oxycontin, and relief from anxiety or depression.

These 7-OH users would be forced to purchase 7-OH from the black market, or other states, if SB 072 passes in its current form.

I'd also like to clear up misinformation on 7-OH today.

Myth #1 7-OH is not a kratom product

To say 7-OH is not kratom is to say caffeine is not coffee or THC is not cannabis. It simply does not make sense.

7-hydroxymitragynine (7-OH) is one of over 40 alkaloids found in the kratom leaf and kratom leaf products. It can be processed and purified into a 7-OH extract product through simple chemistry.

There's also another way to be exposed to 7-OH. Kratom leaf products contain the alkaloid mitragynine (MG), which is converted to 7-hydroxymitragynine (7-OH) in the human body by liver enzymes. Mitragynine is the major alkaloid in kratom, so all humans who consume kratom have 7-OH in their body.

Myth #2 7-OH is as addictive as heroin

While 7-OH can be habit-forming, many products sold legally are, including caffeine, alcohol, nicotine, THC in cannabis, and even the MG in kratom. Education on proper use of 7-OH is key, not a ban that reduces consumer choice in how they manage their quality of life including pain, mood, and energy.

Myth #3 7-OH kills people

Hundreds of thousands of doses of 7-OH have been commercially sold in the United States, with no deaths reported to companies.

A study published in 2019 by Smith et. al did not find an LD50 for 7-OH when taken orally, which meant they could not find a dose that could kill rodents.

In addition, a 2020 study by Todd et. al found 7-OH, similar to other kratom alkaloids such as mitragynine (MG), minimally recruits the beta-arrestin pathway. This makes it hard to cause respiratory depression and death by itself.

The FDA Adverse Event Reporting System (FAERS) has only reported a total of 2 deaths in 2023 and 2024 involving 7-OH, both involving multiple drugs such as morphine, mitragynine, anti-anxiety drugs, and antidepressants.

If you compare this to hundreds of thousands of Americans who die each year from alcohol, prescription drugs such as opioid painkillers and benzodiazepines, and illegal drugs such as heroin, cocaine, methamphetamine, and even kratom leaf products, you can see that 7-OH products are in fact quite safe.

Legal Status

I'd like to point out that **The Federal Government & International Agencies have declined to schedule 7-OH**, and I'd recommend that this committee also reject a ban.

In October 2016, the **DEA** withdrew its notice of Intent and soliciting comments from the public regarding the scheduling of mitragynine (MG) and 7-hydroxymitragynine (7-OH) under the Controlled Substances Act.

In August 2018, the **United States Department of Health and Human Services (HHS)** withdrew its recommendation for scheduling kratom, including MG and 7-OH.

"Therefore, I conclude at the current time, available evidence does not support mitragynine and 7- hydroxymitragynine being controlled in Schedule I of the Controlled Substances Act."
- Assistant Secretary of Health, Brett Giroir, MD

In December 2021, the **Expert Committee on Drug Dependence (ECDD)**, part of the **World Health Organization (WHO)**, concluded there was no evidence to recommend a review of kratom (including MG and 7-OH) for scheduling.

In Conclusion

The ban on 7-hydroxymitragynine (7-OH), semi-synthesized, and synthesized product sales in Colorado proposed in SB 072 is not evidence-based. A ban on 7-OH not only harms the businesses that make 7-OH, but consumers of 7-OH that depend on it to ease chronic pain, stay in recovery from more dangerous opioid painkillers and illegal drugs, and cope with anxiety, depression, post-traumatic stress disorder (PTSD).

Accordingly, I urge lawmakers to amend SB 072 in a manner that eliminates inclusion of this language.

Respectfully Submitted,

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Supporting references are available by clicking a link to the dropbox folder below:

<https://www.dropbox.com/scl/fo/8oxiy28n8d7ucgl49rwdf/AGHHCP5R7ht6UgFXTgltyvA?rlkey=vtnkjbbpi0ywsb2yxxaugf4ay&st=4lpe5l3u&dl=0>