

**January 27, 2026**  
**City Council Meeting**

**Written Public Comments**

# General Public Comment

## Corina Perez

---

**From:** Janice Brownfield  
**Sent:** Monday, January 26, 2026 6:38 PM  
**To:** City Council Public Comment  
**Subject:** Public Comment Non-Agenda Item

"Highlight Sully-Miller Contracting Company's contributions to Southern California" in providing "jobs and careers for the El Modena and Cypress Street barrio communities during times of segregation" is one of numerous enlightening points in the draft Santiago Creek Strategic Plan recommended for approval by the Santiago Creek Commission at its meeting January 28. The draft would then be presented for consideration at a future Orange City Council meeting.

General Portola and Fray Juan Crespi's travels through and stay along the Santiago Creek would be in a digital "section on the City website next to the Orange Barrio site to showcase another important element in Mexican & Spanish history in Orange." Signs would also mark "the Portola expedition, the site of the first orange orchard, Hoyt House . . . and opportunities for the historic El Camino Real bells which highlight the California Mission Trail (near Yorba and Grijalva Parks)." Other markers would include the historic Chinatown area, Native American history, "Boy Scouts Camp Jotham Bixby, Old County Park Road, submerged dam at Santiago Oaks Regional Park, and dropped vehicles that were used for flood overflow as well as the bridge that was detonated."

Separate e-bikes and recreational bikes trails from hiking, dog walking and equestrian trails would "give more access to the creek corridor and help reduce crime and dangerous conflicts." Also recommended are duck feeding stations, removing concrete lining and restoring natural creek bed, and "a community garden that includes an education and composting component." Creek access could be increased to surrounding neighborhoods that currently have locked gates.

The commission could "collaborate with Townsend Public Affairs, and identify potential grant opportunities to help put these recommendations into action." City staff could "develop a trail naming program to supplement ongoing maintenance and cleaning efforts." The commission could engage community groups to discuss projects and "strategize how to best maintain and manage the Santiago Creek through education campaigns and volunteerism."

At the County level, actions to improve our environment by "reducing greenhouse gas emissions, preparing for climate impacts and promoting sustainability" are expected to begin when the Board of Supervisors adopts its Climate Action Plan January 27. The CAP includes a Climate Vulnerability Assessment that "evaluates local climate risks such as extreme heat, wildfires and smoke, air pollution, sea level rise and flooding." The CAP "strengthens the County's ability to pursue state and federal funding for climate initiatives" that include "expanding green spaces and shade in vulnerable neighborhoods."

# Orange City Council

Meeting Time: 01-27-26 18:00

## eComments Report

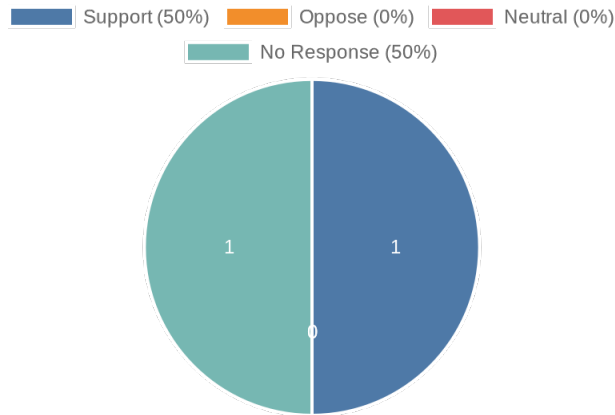
Meetings	Meeting Time	Agenda Items	Comments	Support	Oppose	Neutral
Orange City Council	01-27-26 18:00	35	31	7	18	2

Agenda Name	Comments	Support	Oppose	Neutral
2. PUBLIC COMMENTS At this time, members of the public may address the Council on matters not listed on the agenda within the subject matter jurisdiction of the City Council, provided that NO action may be taken on off-agenda items unless authorized by law. Public Comments are limited to three (3) minutes per speaker unless a different time limit is announced.	2	1	0	0
3.2. Agreement with Hinderliter, DeLlamas & Associates for Tax Administration Services.	1	0	0	1
3.6. Second Reading and adoption of an Ordinance of the City Council of the City of Orange adding Chapter 9.45 of the Orange Municipal Code prohibiting the sale and distribution of kratom products. Ordinance No. 01-26.	28	6	18	1

**Agenda Item: eComments for 2. PUBLIC COMMENTS**

At this time, members of the public may address the Council on matters not listed on the agenda within the subject matter jurisdiction of the City Council, provided that NO action may be taken on off-agenda items unless authorized by law. Public Comments are limited to three (3) minutes per speaker unless a different time limit is announced.

**Overall Sentiment**



**Guest User**

Location:

Submitted At: 3:46pm 01-27-26

January 27, 2026

To the Orange City Council,

I support the City of Orange taking action to stop the sale and distribution of products containing 7 hydroxymitragynine. This is an important first step and a clear recognition that these products pose a real risk to public safety.

My niece, Kielee Rustici, died on March 1, 2025 from acute mitragynine toxicity. She was using kratom powder to manage pain related to Ehlers Danlos syndrome and POTS. Like many consumers, she believed online and industry claims that these products were safe and helpful. Instead, what she trusted fueled an addiction and ultimately took her life.

Highly concentrated 7 hydroxymitragynine products are especially dangerous, but they are part of a broader problem. The kratom market remains unregulated, misleadingly marketed, and easily accessible, leaving communities vulnerable when stronger protections are absent.

By acting now, the City of Orange has an opportunity to reduce harm locally and prevent other families from experiencing the same loss. I urge the council to treat this action as a first step and continue evaluating broader measures that prioritize public health over industry pressure.

Respectfully,

DeNae Jones

Pocatello Idaho

Phone: 208-339-2697

Email: denaejo@yahoo.com

**Leslie Manderscheid**

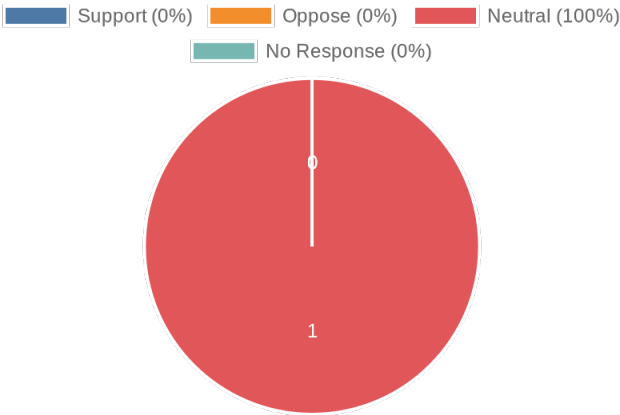
Location:

Submitted At: 3:28pm 01-27-26

All Agenda Items should post the fiscal impact directly on the Agenda.

Agenda Item: eComments for 3.2. Agreement with Hinderliter, DeLlamas & Associates for Tax Administration Services.

Overall Sentiment



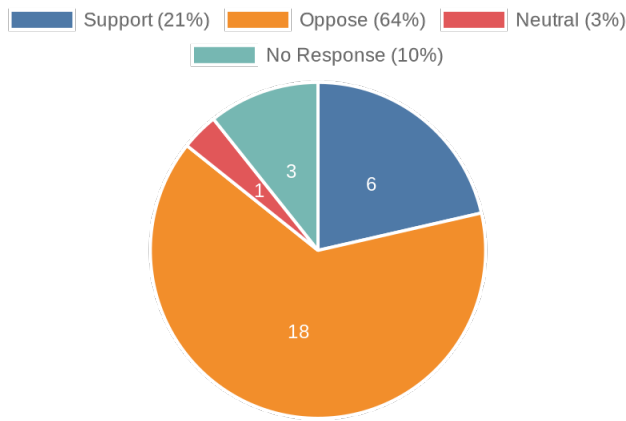
Leslie Manderscheid

Location:  
Submitted At: 3:25pm 01-27-26

This Agenda item and all Agenda Items should post the fiscal impact directly on the Agenda. This professional Service agreement with Hinderliter, De Llamas & Associates to provide Business License Administration and Discovery & Compliance, Transient Occupancy Tax Administration and Audit, and Short Term Rental Administration is nearly \$400,000. Please post this cost upfront on the actual Agenda.

Agenda Item: eComments for 3.6. Second Reading and adoption of an Ordinance of the City Council of the City of Orange adding Chapter 9.45 of the Orange Municipal Code prohibiting the sale and distribution of kratom products. Ordinance No. 01-26.

Overall Sentiment



Guest User

Location:  
Submitted At: 5:59pm 01-27-26

To whom it may concern,

I write to you today to ask that you vote NO on this ordinance. My partner has chronic pain that makes normal activities, that the able bodied have no problem doing, almost impossible most days. With the crackdown by the government on pain relieving drugs, things have been even harder. Thankfully she found natural kratom that has made things more bearable for her. With the help of natural kratom she has been able to live her life. It has been such a life saver. I hate seeing her in pain and natural kratom has made her feel better.

Thank you for your time.

Guest User

Location:  
Submitted At: 5:18pm 01-27-26

Kratom (*Mitragyna speciosa*) has a long history of traditional use in Southeast Asia as a natural, whole-plant remedy for pain management, fatigue, and opioid harm reduction. When consumed in its natural, unaltered leaf form, kratom functions as a mild, plant-based medicine with a comparatively low risk profile. The primary public-health concerns associated with kratom in the United States are overwhelmingly linked not to raw kratom leaf, but to high-potency kratom extracts and synthetic concentrates. These products dramatically alter the plant’s natural alkaloid balance, increase dependency risk, and have been disproportionately associated with adverse events, misuse, and hospitalizations. Whole-leaf kratom contains a complex spectrum of alkaloids that naturally moderate one another, producing a ceiling effect that reduces the likelihood of respiratory depression and overdose. Extracts, by contrast, bypass this natural safeguard by isolating and amplifying specific alkaloids—particularly mitragynine and 7-



hydroxymitragynine—creating pharmacological effects that are fundamentally different from traditional use. From a regulatory and public-health perspective, banning or restricting kratom extracts while protecting access to raw, unadulterated leaf kratom represents a balanced, evidence-based approach. This strategy:

- Reduces harm and abuse potential
- Preserves access for individuals using kratom as an alternative to opioids
- Respects traditional and medicinal plant use
- Encourages transparency, quality control, and responsible consumption

Prohibition of whole-leaf kratom risks pushing consumers toward illicit markets or more dangerous substances, while failing to address the true source of harm. Regulation should therefore focus on product purity, labeling, age restrictions, and the elimination of concentrated extracts, rather than blanket bans that ignore critical distinctions within kratom products.

In summary, raw kratom leaf is best understood as a medicinal plant, not a synthetic drug. Sensible regulation—rather than prohibition—can protect public health while honoring both scientific evidence and traditional practice.

### Guest User

Location:

Submitted At: 5:07pm 01-27-26

Hello my name is Mariana otero and i grew up here in orang. I  
Im writing to give you a little perspective on kratom and how its changed my life for the better.  
About 25 years ago I suffered a tragic accident that left me with debilitating pain.  
I was given opiods by my doctor's which lead me to become dependant.  
Throughout the next few years I had 3 massive back surgeries and dozens of other treatments to address my  
Injuries. But the main one was opiods. A lot of them. I became both an addict and a chronic pain patient taking up  
to 60 pills a day to get by. Id develop tolerance and then they would increase my dosage and type of narcotic.  
I was a walking zombie on long term disability.  
My constant desire to get clean and off these meds lead my to be in and out of rehab facilities. Many hospitals  
stays where I would be chemically detoxed by doctors and nurses.  
The times I would be free of the addiction I would be confronted with the chronic pain of my injuries. I was a  
prisoner to opiods.  
Unable to work, exercise or have healthy relationships with friends and family.  
Until I discovered kratom.  
Kratom saved my life. It allowed me to be able to cope with my chronic pain as well as allow to have a normal  
quality of life off of opiods.  
I now work full time, work out 6x a week and feel liberated from years of constant withdrawals and addiction.  
Its allowed me to again be able to have good relationships with family and friends.  
With 8 little grams of a green natural powder a day I feel great. All while never needing to increase the dose. It  
keeps me pain free and helps my depression and anxiety all while never needing to take the poison that stole so  
many years of my life.  
So I ask you to please keep natural kratom leaf legal and accessible. I am in favor of banning 7-oh which is not  
kratom leaf. Its a synthetic form that 100x the strength and very dangerous.  
I ask that you consider regulating kratom like more than a dozen other states and cities have done. Wirh the the  
kratom consumer protection act  
Which would ensure kratom products are not adulterated, it would limit sales to individuals at least 18 or 21 years  
and require proper labeling.  
Kratom has saved so many lives and gives people a natural way to cope with debilitating conditions including  
chronic pain and depression.  
If you took this plant away my whole world would fall apart and I would be forced to turn to very dangerous opiods  
again and that would surely destroy my life. I would lose everything I've built and back to a life of active addiction.

My story is just one of millions. Kratom is safe and a miracle to people like me.  
Thank you for listening and considering my story. I know you'll make the right decisions.  
With love,  
Mariana Otero

**Guest User**

Location:

Submitted At: 4:31pm 01-27-26

Hello Council Members,

I am writing to respectfully oppose any proposed ban on kratom. Kratom has helped me significantly manage chronic pain with no negative side effects and without making me feel impaired or “under the influence” in any way. Because of kratom, I am able to function normally, remain clear-headed, and continue working a very stressful job.

That ability to work is not a small thing. It allows me to support myself, pay a substantial amount in taxes, and contribute to society in a meaningful way. Without kratom, my pain would be far more limiting, and my quality of life — as well as my ability to remain productive — would be seriously compromised.

Many people rely on this natural plant to get through their day. It helps manage pain effectively without producing a “high,” without intoxication, and without the severe side effects or risks associated with many prescription pain medications. For countless individuals, kratom is the difference between participating in daily life and being sidelined by pain.

It is deeply concerning and disheartening to see kratom placed on the agenda for a potential ban, especially when it is being grouped with or conflated with 7-hydroxymitragynine (7OH). I strongly urge the Council to research kratom itself, not just isolated compounds, and to understand the important differences between the whole plant and synthetic or concentrated extracts.

Most importantly, I ask that you listen carefully to the public comments submitted here and shared in person tonight. You will hear from many people whose lives have been positively impacted by kratom — people who are parents, workers, caregivers, and contributing members of the community.

Please consider regulation, education, and quality control rather than prohibition. A ban would not protect people like me; it would only take away a tool that allows us to live functional, productive, and pain-managed lives.

Thank you for your time, your consideration, and for listening to the voices of the people this decision will directly affect.

**Guest User**

Location:

Submitted At: 3:56pm 01-27-26

Hello,

I am an LA county resident. I'm writing as a constituent and a responsible kratom user of eight years. I use natural leaf kratom for pain management and as a safer alternative to caffeine, and it has significantly improved my quality of life.

I want to be clear that I am strongly opposed to adulterated kratom products, specifically highly concentrated 7-OH (7-hydroxymitragynine) products. These are not representative of traditional, natural leaf kratom and should be regulated or restricted separately. I fully support strict standards to prevent unsafe, synthetic, or manipulated products from being sold.

At the same time, I am in full support of natural leaf kratom and believe it should remain legal with sensible regulation. A full ban would harm responsible consumers like myself and push people toward unregulated and unsafe alternatives. Regulation, not prohibition, is the best way to protect public health.

I respectfully urge you to oppose any blanket ban on kratom and instead support policies that distinguish between dangerous adulterated products and responsibly sold natural leaf kratom.

Thank you for your time and for your commitment to public safety.

Sincerely,

Paul Todisco

**Guest User**

Location:

Submitted At: 3:50pm 01-27-26

Mayor and Members of the Orange City Council,

My name is Jordan Richard, and I appreciate your time and consideration.

For the past 13 years, I have dedicated my life to studying kratom. I have traveled across the United States and internationally, interviewing researchers, clinicians, toxicologists, and regulators, including experts associated with Johns Hopkins and the FDA. Through this work, I have developed a practical understanding of kratom and how it is used in the real world. I am also the author of one of the most widely read books on kratom, written to help policymakers separate science from speculation.

I want to highlight the position of California's own narcotics authorities. The California Narcotic Officers Association does not call for banning kratom. Instead, it supports regulating traditional kratom leaf while banning high-potency synthetic products such as 7-hydroxymitragynine, often referred to as 7-OH.

If the kratom leaf itself posed a public safety risk, law enforcement would recommend prohibition. They have not, because they recognize a clear difference between traditional kratom leaf and synthetic derivatives. One is presenting problems. The other is not.

This same framework has been adopted across California, including Orange County. Cities have chosen regulation over prohibition because it is targeted, enforceable, and evidence-based.

Federal regulators share this view. The current FDA Commissioner has stated that the FDA is not concerned with traditional kratom leaf, but rather with high-potency synthetic products. The FDA has also released its first human-focused study on kratom, funded directly by the FDA, concluding that kratom appears to be safe even at high exposure levels.

Banning 7-hydroxymitragynine is not difficult to enforce. Jurisdictions already do this by limiting total 7-hydroxy content to two percent or less, directly targeting synthetics while allowing regulated traditional products.

Independent research has found that kratom has a relatively low potential for abuse compared to traditional opioids, with a safety margin roughly one thousand times greater than prescription opioids.

I also speak from lived experience. I am a former heroin addict and today a business owner and father of five. Addiction involves compulsive behavior despite harm. Physical dependence simply reflects adaptation. Many people are physically dependent on prescribed medications, including antidepressants, without being addicted. That distinction matters here.

Traditional kratom leaf has been used daily by millions of people in Southeast Asia for over 1,000 years, including Indigenous communities such as the Dayak people of Borneo, with no documented deaths attributed to traditional use. The concerns being raised today are recent and align with the emergence of synthetic and concentrated products.

Regarding liver injury, the NIH's LiverTox database reports 26 potential cases among an estimated 20 million U.S. users, approximately 0.00013 percent. Context matters when evaluating risk.

The question before the City of Orange is not whether to allow something harmful, but whether to regulate responsibly while drawing a clear line against synthetics.

Respectfully,

Jordan Richard  
Author, The Truth About Kratom: Life-Saving Plant or Botanical Menace?

**Dan Gibbs**

Location:  
Submitted At: 3:47pm 01-27-26

I am submitting this comment in strong support of Ordinance No. 01-26, and I do so as a parent who has already paid the highest possible price for kratom being legal, normalized, and aggressively defended.

My son, Austin, was not a drug user. He was a normal young man with plans, relationships, and a future. He worked, he laughed, and he believed—because he was repeatedly told—that kratom was a “natural” and safer product.

That belief did not come from science.  
It came from organized industry messaging.

Groups such as the American Kratom Association and the Global Kratom Coalition promote kratom as safe, minimize documented harms, and flood public hearings with user testimony designed to normalize continued access. They frame themselves as advocates, but function as trade organizations whose primary goal is protecting sales, not lives.

On December 6, 2023, my son Austin died alone in his bedroom after consuming a kratom product he believed was legal and safe.

His official autopsy and toxicology report, completed by the Montgomery County, Ohio Coroner, determined:

- Cause of Death: Intoxication by mitragynine
- Toxicology: Mitragynine only
- No fentanyl, no illicit drugs, and no prescription opioids present
- Findings: Pulmonary edema and frothy airway fluid, consistent with opioid-type respiratory depression

This was not a contaminated product.  
It was not mixed with alcohol.  
It was not misuse in the way advocates often imply.

It was the predictable pharmacological effect of kratom itself.

Kratom's primary alkaloid, mitragynine, is opioid-active and is converted by the human liver into 7-hydroxymitragynine, a compound more potent than morphine. No warning label, dosage suggestion, or “responsible use” guideline can prevent that biological conversion.

And this is the point that is rarely said out loud:

When kratom users stand at podiums and say “this pure leaf powder got me off morphine, oxycodone, heroin, or fentanyl and saved my life,” they are not proving safety.

They are proving opioid equivalence.

A substance does not replace heroin unless it acts on the same opioid receptors. A product does not suppress withdrawal unless it has clinically meaningful opioid potency. You cannot simultaneously argue that kratom is weak and harmless while also claiming it is powerful enough to replace heroin.

Those statements are not evidence of safety.  
They are admissions of dependence-forming potency.

Public health is not decided by who feels better today. It is decided by mechanism of action and population-level harm. And by their own words, kratom users are describing opioid substitution—not a dietary supplement.

Austin believed kratom was safe because it was legal, sold openly, and defended loudly. That false sense of safety cost him his life.

Local governments exist to protect residents when higher systems fail. Ordinance No. 01-26 is a responsible and necessary use of the City's police power to stop the commercial sale and distribution of a product with no FDA approval, no accepted medical use, and real, documented fatalities.

Please do not allow emotional testimony or outside trade groups to override medical reality. This ordinance is not about judging users—it is about preventing the next family from standing where mine is now.

I respectfully urge the City Council to adopt Ordinance No. 01-26.

Thank you for your time and for choosing public safety over industry pressure.

**Guest User**

Location:

Submitted At: 3:40pm 01-27-26

My name is Susan Cave and i fully support 3.6

My son, William, died in 2024 from a toxic mixture of raw leaf kratom and his prescribed antidepressants. He started using kratom to supplement his antidepressants to treat his anxiety & depression. Everything he and I read on-line said it was safe and all natural and MARKED with a Good Manufacturing Practice stamp of approval. Will took kratom for about 1 year before he realized he'd become dependent. He kept having to up the dose to achieve the same desired effect. Will spent the last 3 years of his life trying to withdraw from kratom..it was a vicious cycle full of embarrassment, feelings of hopeless and helplessness.

You will hear from the pro kratom community which consists of chronic pain sufferers and drug addicts who claim the can not possibly function without kratom. All I can tell you is I lost my son--HE IS DEAD--because kratom is readily available in gas stations, smoke shops and on-line. How can a person be a responsible kratom consumer if so little is know about how to consume kratom safely. No lethal dose has been established, no studies of how kratom interacts with other drugs, no studies how kratom might effect a person with pre-existing health conditions or how chronic use effects the body. I honestly cant even believe my son is dead when kratom is not even suppose to be in this country...why won't the DEA enforce IMPORT ALERT 54-15 ?? I sincerely applaude the efforts of the people on this committee in keeping your citizens safe from this deadly poison...SusanCave

**Guest User**

Location:

Submitted At: 2:57pm 01-27-26

It makes no sense to punish the 97% of responsible adult citizens because of adverse events from the 3% addiction (profile) be mindful that addiction is a mental illness that infects family members, co-dependency also a mental illness. That's equal to banning guns because of the unstable users and criminals. I'm offended as a USMC veteran and a working senior citizen that laws are shaped because of the 3%. To add insult to injury to ban kratom is a "death sentence " to untold thousands of responsible citizens who have broken no laws or misuse this natural leaf product, none of this makes sense especially when quality,enforced regulations are the practical solution. SMH

**Guest User**

Location:

Submitted At: 2:39pm 01-27-26

My name is Susan Eppard,

In 2021 my 22 year old son Matthew Eller died from whole leaf Kratom Powder (the least potent form of Kratom available in the United States). Kratom caused him to have a seizure, go into cardiac arrest and die. His toxicology showed he died from the "TOXIC effects of Mitragynine" an alkaloid found only in Kratom. He had no prescription drugs, no street drugs nor alcohol in his system when he died, and his autopsy showed he had no underlying health conditions. It's important to note my son didn't die from 7-OH/7-hydroxymitragynine.

**Guest User**

Location:

Submitted At: 2:20pm 01-27-26

Hello, my name is Bunny Baker and I'm from Tulare County Ca

Pure, plain leaf powder Kratom has had a profoundly positive impact on my quality of life. Before I started using it, I had been diagnosed with severe depression and struggled with chronic migraines. My days were often spent in bed, exhausted and unmotivated. I felt disconnected from my family and from life itself.

Since incorporating kratom into my wellness routine, I've experienced a complete turnaround. My energy levels have improved dramatically, and my migraines have become far less frequent. Most importantly, the heavy cloud of depression that once controlled my life has lifted. I now wake up feeling motivated and capable.

I'm an involved mother, a supportive wife, and an active member of my community. I've been able to return to regular exercise, eat healthier, and live fully again—something I never thought I'd be able to say.

Kratom hasn't just improved my mood; it's given me back my sense of purpose, balance, and well-being. It's helped me reduce dependence on antidepressants and reconnect with life in a natural, sustainable way.

Please regulate and keep lab tested plain leaf kratom legal.

Thank you,  
Bunny Baker

**Guest User**

Location:

Submitted At: 2:17pm 01-27-26

Public Testimony Regarding Natural Kratom

City of Orange

Good evening Mayor and Council Members,

My name is Christopher Deaney. I am a lifelong American, a small business owner, and someone who has lived with chronic pain since childhood after being struck by a car at the age of eight.

For many years, I followed the traditional medical path and was prescribed opioid pain medications long-term. While legal and doctor-prescribed, those medications came with escalating risks. In 2015, after careful research and consideration, I transitioned away from that path and began using plain, natural kratom leaf prepared as a traditional tea.

I want to be very clear about what I am speaking about tonight.

I am not here to defend synthetic products, isolated alkaloids, or highly concentrated substances being sold under the name "kratom." I share concerns about those products, and I believe they should be addressed directly through regulation or removal.

What I am asking you not to ban is natural kratom leaf.

This distinction is supported by the American Herbal Products Association (AHPA), the national trade organization representing the herbal products industry. In 2025, AHPA published a new entry in its Botanical Safety Handbook recognizing *Mitragyna speciosa* leaf as a traditional herbal material and clearly distinguishing it from synthesized or chemically altered kratom alkaloids. AHPA has also issued guidance stating that synthetic kratom alkaloids should not be conflated with the natural botanical.

This information is publicly available here:

[https://www.ahpa.org/blog\\_home.asp?Display=279](https://www.ahpa.org/blog_home.asp?Display=279)

Policy works best when it is based on accurate classification. Treating natural leaf the same as synthetic or altered products misidentifies the risk and leads to unintended consequences.

Natural kratom is a whole-plant botanical related to the coffee family. In its traditional form, it has been used responsibly in Southeast Asia for generations and by millions of Americans for over two decades. For people like me, it functions as a stability tool, not an intoxicant and not a recreational drug.

History consistently shows that blanket bans do not eliminate demand. They push responsible adults away from transparent products and toward unregulated or illicit alternatives. That outcome increases risk rather than reducing it.

If the City's goal is public safety, a more effective approach is targeted regulation, not prohibition:

- Distinguish natural leaf from synthetic or altered products
- Require proper labeling and testing
- Keep products out of the hands of minors
- Hold bad actors accountable without punishing responsible consumers

I am also a father, and I take public safety seriously. That is why I am asking the City to focus on the real sources of harm rather than removing a traditional botanical that many adults use responsibly to maintain quality of life.

Natural kratom leaf is not the problem.  
Lack of distinction is.

Please consider an evidence-based, balanced approach that protects public health without unintended harm.

Thank you for your time and consideration.

Respectfully,  
Christopher Deaney

**Guest User**

Location:

Submitted At: 2:01pm 01-27-26

Hello Mayor, Councilmembers, and staff,

Please do not pass Ordinance 01-26 as currently written. The draft unintentionally bans natural kratom leaf instead of focusing on the products that actually pose the highest risk to public health.

You correctly identified that 7-hydroxymitragynine and synthetic kratom derivatives are dangerous and should be removed from stores. These are potent, highly addictive, and lack safety data. Natural kratom leaf is different. It contains only trace 7-OH and has research supporting its relative safety in a regulated market.

Scientific evidence shows that natural leaf kratom:

- Does not trigger the respiratory depression pathway associated with opioids
- Shows lower addiction potential in preclinical studies
- Is used by adults to improve daily functioning or reduce more dangerous substances
- Was well tolerated in a recent randomized, double-blind human study
- Causes serious harm mainly when adulterated or synthetic

Other California jurisdictions, including Riverside, Orange County, Huntington Beach, Fresno, and Laguna Niguel, allow regulated natural kratom while prohibiting high-potency extracts and synthetics. This protects consumers without pushing them to illicit markets.

In July 2025, FDA and HHS stated they support scheduling 7-OH products but not natural kratom. They have formally asked DEA to begin scheduling only 7-OH.

Banning natural leaf eliminates oversight and testing. Regulation allows for age restrictions, product testing,

labeling standards, limits on extracts, and explicit prohibition of synthetic derivatives.

A regulatory approach addresses the real sources of harm while preserving responsible access for adults.

Thank you for considering a practical and public-health-focused solution. I am happy to provide research or assist with refining the ordinance.

**Guest User**

Location:

Submitted At: 1:56pm 01-27-26

Hello Mayor, Councilmembers, and staff,

My name is Anthony Rosa, and I'm a lifelong California resident. I'm 29 years old, and I've been a kratom user for six years. I'm not here to defend synthetic 7-hydroxy derivatives — I've never used them, and I fully agree they should be restricted. But please don't punish responsible adults who use natural kratom leaf powder. It's a mild, traditional plant that has been safely used for generations. Kratom is NOT 7-OH.

I still struggle every day with anxiety, stress, and depression. The pressure of my life is constant, but kratom is what gets me through it. It's the only thing that keeps me functional, stable, and able to provide for my family. Without it, I would likely fall back into alcoholism.

Kratom didn't turn me into an addict — It helped me overcome crippling lethargy, rebuild my motivation, and become a small business owner. I am living proof that kratom can save lives.

Lumping lab-tested kratom leaf together with synthetic 7-OH is a scientific and moral mistake. Those synthetic capsules contain up to a thousand times the alkaloid concentration of natural kratom powder. Even The federal dept of health and human services. reached out to the state in late September urging California to make that distinction clear. Texas chose a 7OH limit over a blanket ban. Why can't we? The actions of our state public health department are authoritarian, and are not making that distinction.

How can we allow adults to legally buy alcohol and cigarettes — substances proven to kill — yet criminalize a natural plant that helps people live?

Please, Do not force people like me back into despair and addiction.

Thank you for your time and compassion.

**Guest User**

Location:

Submitted At: 1:10pm 01-27-26

Good afternoon,

My name is Holly Trouville and I am writing to you as a mother who lost her only child Ty, to mitragynine toxicity, on February 6th, 2024. I am not a lobbyist, a business owner making money, nor a user. My only goal is to prevent any parent from feeling the complete and utter devastation I felt losing my only child. I am trying to prevent having a parent only be able to speak to their child, 6 feet under, in a cemetery.

Mitragynine toxicity was Tyrell's sole cause of death, with no secondary causes nor opioids in his system. And, it was ruled as only an accident. Tyrell died from a Kratom seltzer drink that is marketed as caffeine free, sugar free, and alcohol free. He drank them at the Kava bar he would go to.

Regulation does not work, as much as people may think it does. The majority of deaths are men over 21, to regulate under 21 is futile. Due to there being no federal regulations, oversight, nor FDA approval, we do not know if mixing anything with Kratom, even something such as Benadryl or prescription medicine will give an adverse effect. There is not enough information known to say how much could be taken to prevent an adverse effect. There is no labeling saying what could cause an adverse effect. There are also no dosage recommendations on any of these packages. So when talking about selling Kratom to uninformed consumers, people who are looking for help and trusting sellers to do the right thing, that is not always happening.



Here are proven facts. The majority of people using whole leaf, synthetic, or 7OH are recovering addicts. You can hear it in almost every hearing. Why did Fell Free Wellness Tonic, one of the largest sellers of Kratom drinks, have to pay 8.75 million dollars and add a disclaimer on the back of their can stating "Individuals with a history of substance abuse are advised against use." If it is so natural, why can't you use it if you have a history of substance abuse and why does it state you should consult a physician before trying it, if you are on any medication? This should be gravely concerning to you.

You will hear people testify that veterans use it to help them with their PTSD. Then please answer this, why did the DOD ban Kratom in ALL armed forces? Use of it is punishable by the Uniform Military Code of Justice. That in and of itself is telling. The DOD obviously does not believe it benefits military people. I could go on and on but these are just a couple examples of how Kratom, in all forms, is being recognized as dangerous, addictive, and deadly.

I implore you to ban ALL forms of Kratom, natural and synthetic. You will be saving more lives than not. Lastly, all of these people testifying that Kratom has saved their life, that is opinion only. I have yet to see one letter from a doctor stating that it has saved a life. You will not see that because a doctor will not put their stamp on that. However, I have a letter from a doctor stating that Kratom took my son's life. Death certificates do not lie, autopsy reports do not lie.

Please don't allow another parent to have to live the rest of their life without their child, due to a substance that if it already hasn't, will kill some of the people you represent..

Thank you and with much respect,  
Holly

#### **Guest User**

Location:

Submitted At: 1:00pm 01-27-26

Im in full support for a full ban on kratom. My perspective comes from a loss no parent should ever experience. My daughter Kielee died on March 1st 2025 of a mitragynine overdose. She was only 23. Because she was so young they had to do an investigation. After an autopsy and toxicology screen was preformed mitragynine overdose was determined to be the factor of death.

Kratom took my daughter's life and robbed the world of the light she brought into it. She trusted the word natural. Kielee used the natural kratom powder. She believed it was safe to use for pain because that is how the industry markets it. She was not using extracts or 7OH products. The leaf itself killed her. Regulations wouldn't have saved her because she was 23 and didn't buy it from a gas station.

Mitragynine and 7OH both bind to the same opioid receptors as morphine. The idea that the natural powder is harmless while only certain extracts are dangerous is not supported by what is happening in real families. Both forms take lives.

My state of Idaho reported 83 kratom involved deaths between 2020 and 2024. Bonneville County recorded six deaths in eighteen months. Four were from mitragynine alone one of was my daughter. Mitragynine overdose is what i have to read on her death certificate. These deaths mirror what other states are seeing, especially as kratom becomes more available in small shops and gas stations.

I want you to understand this because your decision will shape what families in your community face. Parents don't know what it is. Young people assume it's safe. The reality does not match the marketing.

You may hear the argument that the Kratom Consumer Protection Act is the safer middle ground. It is important to understand what the KCPA actually is. It was written and promoted by the kratom industry, not by medical or toxicology experts. Its purpose is to protect sales,

States that passed the KCPA continue to see addiction, poison center calls, emergency room visits, and kratom

related deaths. The KCPA does not place real caps on potency. It does not control online sales. Local agencies have no practical way to enforce it. And banning 7OH alone is pointless because mitragynine naturally converts to 7OH once it is inside the body.

The industry is already developing new derivatives like MGM 15 and MGM 16. A full ban is the only approach that closes the loopholes and keeps this opioid acting substance out of your community.

I know bans are not easy decisions. But I also know what it feels like to stand in my daughter's empty bedroom and wonder how something sold as a "natural herb" destroyed her life. I would give anything to go back and warn her. I can't. But I can warn you.

I am asking you to put a ban on kratom so no family has to learn the same lesson through the loss of a child parent spouse or friend. Thank you for taking the time to listen and for putting the safety of your residents first.

Sincerely, Tia

### **Guest User**

Location:

Submitted At: 12:55pm 01-27-26

### **Public Comment in Support of the Orange City Kratom Prohibition Ordinance**

Good evening Mayor and Councilmembers,

My name is Wendy Chamberlain. I am the founder and Chair of Kratom Danger Awareness, Inc., a national nonprofit, and I am here today as a mother who lost her only child because the dangers of kratom were never made clear.

My son, Joseph S. Lumbrazo, was a healthy, hardworking father of three. He did not use illicit drugs. He did not use prescriptions. He used plain kratom leaf powder, sold legally and marketed as a "natural" and "safe" supplement for energy. On August 30, 2020, Joseph died from mitragynine toxicity, the primary active alkaloid in kratom.

Seeing something sold openly in gas stations and smoke shops listed as the cause of your child's death is something no parent should ever experience.

This ordinance is important because regulation has not worked. Across the country, states that chose regulation instead of prohibition have seen continued injuries, poison center calls, addiction, and deaths. Products are mislabeled, adulterated, or sold with little to no meaningful warnings. Enforcement is inconsistent, and the market simply shifts to new formulations and more potent derivatives.

Local governments like Orange City are often the first line of defense when higher levels of government fail to act quickly enough. Prohibiting kratom is not about criminalizing people—it is about preventing harm, protecting families, and stopping a dangerous product from being sold as a harmless supplement.

I urge you to support this ordinance and take a clear, decisive stand for public health and safety. Your action here has the power to prevent future tragedies like mine.

Thank you for your time, your leadership, and your commitment to protecting your community.

Wendy Chamberlain  
Kratomdangerawareness.org

**Lora Romney**

Location:

Submitted At: 12:23pm 01-27-26

Dear Orange City Council,

Please do not pass Ordinance 01-26 as currently written at today's meeting. While much of the ordinance is well intentioned, it unintentionally bans natural kratom leaf rather than targeting the products that pose the greatest risk to public health.

You correctly identified that 7-hydroxymitragynine (7-OH) and synthetic kratom derivatives are dangerous and should be removed from store shelves. These products are strong, synthetic, highly addictive, and have no established safety record. Natural kratom leaf is fundamentally different. It contains only trace amounts of 7-OH and has extensive scientific research supporting its relative safety when sold in a regulated marketplace.

Kratom is a natural plant, not a synthetic isolate. Hundreds of peer-reviewed studies on kratom's chemistry, pharmacology, and public health impact show:

- Natural kratom leaf does not activate the same biological pathway responsible for opioid-related respiratory depression
- Preclinical studies demonstrate lower addiction potential than traditional opioids
- National surveys show many adults use kratom to improve daily functioning or reduce reliance on more dangerous substances
- A recent randomized, double-blind human study found encapsulated kratom leaf powder to be well tolerated with no serious short-term safety concerns
- The most serious harms are consistently linked to adulterated, contaminated, or synthetic products—not natural leaf kratom

Riverside set an important precedent in California by banning products above a 2% alkaloid fraction (targeting 7-OH) while allowing regulated natural leaf kratom. Other jurisdictions that have taken this balanced approach include Orange County, Huntington Beach, Fresno City, Fresno County, Riverside, and Laguna Niguel. These policies protect consumers without driving them into illicit markets.

At a July 29, 2025 press conference, the FDA and HHS made clear they support scheduling 7-OH products while leaving natural kratom legal. They have formally requested that the DEA begin the scheduling process for 7-OH—but not kratom itself.

A ban on possession and sale of natural kratom removes the city's ability to regulate, test, or label products and eliminates oversight altogether. Regulation provides tools; prohibition takes them away.

A regulatory framework modeled on the Kratom Consumer Protection Act would allow Orange to:

- Set age limits
- Require product testing
- Ensure accurate labeling
- Limit high-potency extracts
- Explicitly prohibit synthetic or semi-synthetic derivatives such as 7-OH, pseudoindoxyl, and MGM-15 & 16

This approach directly addresses the sources of harm while preserving access to a plant-based product many adults use responsibly.

Thank you for your time and for considering a practical, public-health-focused path forward. I am happy to provide education, research materials, or assist with ordinance refinement.

Sincerely,

Lora Romney

President, International Plant & Herbal Alliance

**Guest User**

Location:

To whom it may concern,

Thank you for taking the time to hear this written request. I am writing to advocate for raw leaf kratom, asking that the board consider regulating raw leaf kratom while outright banning the synthetic product known as "7-OH."

Currently, there is widespread misinformation/miseducation in the public media regarding kratom's safety.

Unfortunately, the synthetic product 7-OH has appeared in smoke shops across America, marketed as a kratom product over the last 2 years causing problems with break-ins at smoke shops (to steal the product) concerns of children under the influence while also possibly being linked to some overdose deaths;.

Most 7-OH products are displayed alongside Raw Leaf Kratom products misleading consumers all the more while also trying to entice the younger under aged consumers with brightly colored packaging using familiar cartoon characters and grandiose wording to further entice others who are not looking for a maintenance level adjustment but seeking more of a "trainwreck" like experience.

While 7-OH shares a common alkaloid with kratom, it is in fact a very different substance—chemically manipulated and derived from compounds similar to those found in pool-cleaning solvents. It is far stronger and far more dangerous than natural kratom.

There is several years of reliable scientific fact based evidence of raw leaf kratom's safety and use over 100 to possibly thousands of years. Used for pain management, mood enhancement, energy or even soothing withdrawal symptoms for those with SUD. Kratom has been a savior for millions in America allowing them to remain in the community as productive individuals seeking self help and independence.

And you may hear from organizations like "Mothers Against Kratom." or the "Kratom Danger Awareness" group that have testified in Congress and receiving support from state legislatures and others who have professional medical license to push for kratom bans. At the same time, not recognizing, ignoring, or are they possibly being misled that the pharmaceutical interests—including those tied to opioid treatment medications like Suboxone—have financial incentives to oppose kratom's legalization?. Medical professionals prefer medications over nature though the natural supplements come with far less side effects or adverse effects as compared to medications such as Suboxone. Relying on shorter trial times than that of kratom's known historical use is several countries as well as information available in the U.S. If one would "Follow the money" funding these advocacy groups , much of their support is coming from these medical professional groups standing on their "institutional and clinical success" within the prescription treatment regime and (ironically) their stance that addiction is the problem and not the initial prescribing issues, be it the weaning or length or strength of initial prescription that got the patient needing treatment in the first place.

I respectfully ask that you consider the lead of the several states across the US that have adopted Kratom Consumer Protection Act–style regulations, ensuring safe access to raw leaf kratom while banning 7-OH altogether.

Raw leaf kratom has been shown to provide beneficial and positive support for harm reduction, particularly for individuals struggling with opioid use disorders and chronic pain.

Thank you for your time and consideration

**Guest User**

Location:

Submitted At: 11:21am 01-27-26

Dear city council,

I oppose this potential ban on kratom. My concern is that the ordinance does not distinguish between traditional kratom leaf and newer high-potency 7-OH products, which have very different risk profiles.

A blanket ban on all kratom products removes lower-risk, widely used products from the legal market while failing to specifically target the newer concentrated products that are driving safety concerns. In many cases, broad prohibitions like this can make enforcement harder and unintentionally push consumers toward unregulated alternatives.

I respectfully encourage the Council to consider a narrower approach that:

- \* Allows regulated sale of kratom leaf with appropriate safeguards, and
- \* Specifically prohibits or restricts 7-OH products.

Thank you for considering this perspective as you review the ordinance.

Michelle Eagan-White  
Tax Payer  
Orange, CA

**Guest User**

Location:

Submitted At: 11:16am 01-27-26

Dear Orange City Council,

I respectfully urge the Council to reconsider a full ban on kratom and instead adopt a more targeted, common-sense approach.

The easiest way to understand this issue is with a familiar analogy: coffee.

Coffee has been around forever. Millions of adults consume it safely every day. It is widely understood, regulated, and relatively low risk when used normally.

Now imagine someone isolates caffeine, chemically concentrates it, and sells it as a tiny pill or shot. People begin getting hurt because the effects are faster, stronger, and harder to control.

In that situation, you would not ban coffee.

You would regulate or prohibit the dangerous, high-potency caffeine products.

That distinction matters here.

Kratom leaf is like coffee. It is a whole-plant product, slower acting, and widely used by adults.

7-OH products are like super-potent caffeine pills. They are chemically manipulated, highly concentrated, and are where the real safety concerns originate.

Banning kratom leaf because of 7-OH products would be like banning coffee because someone created dangerous caffeine pills. It would not solve the underlying problem — and history shows that prohibition does not work. It tends to push consumers toward unregulated or higher-risk alternatives.

A more effective approach would be to:

Regulate kratom leaf, including age limits, labeling, testing, and manufacturing standards.

Prohibit or strictly regulate 7-OH products, which do not belong in the supplement marketplace.

This approach protects public health while avoiding unnecessary prohibition and ensures enforcement is focused on the products that actually pose elevated risk.

Thank you for your time and consideration as you deliberate this item.

Thank you for your time.

Best,

Jeff Michaels  
Resident  
Orange, CA

**Guest User**

Location:

Submitted At: 11:08am 01-27-26

Dear Members of the Orange City Council,

My name is Justin Wolf, and I'm the Founder & CEO of New Brew, a California-based 21+ alcohol-free beverage company. Our products contain small, clearly disclosed servings of natural kratom leaf -- a botanical that has helped many adults, including myself, move away from alcohol.

I understand and respect your goal of protecting public health, especially for young people. However, I strongly urge you to reject Ordinance No. 01-26 if it includes a blanket ban on kratom. That approach is not common-sense public health policy -- it is prohibition, and it will cause real harm while failing to address the true source of risk in this category.

A full ban does not target bad actors. It targets responsible adults, people seeking alternatives to alcohol, and small businesses operating transparently and legally. It would effectively criminalize law-abiding residents for accessing a natural leaf product that remains legal federally and is already regulated responsibly in many states.

The core issue is that natural kratom leaf is being wrongly lumped together with 7-hydroxymitragynine (7-OH) isolate products. These high-potency, often synthetic products carry a drastically different risk profile. But 7-OH is not kratom. A blanket ban on kratom leaf will not stop 7-OH -- it will push everything underground, remove responsible sellers, and make enforcement harder.

We don't claim kratom is risk-free. But regulation works better than bans.

California already has a framework underway through AB 1088, which would restrict sales to adults, require clear labeling and third-party testing, enforce potency limits, and ban synthetic or spiked products including 7-OH isolates. Many cities and counties have adopted similar approaches after reviewing the facts. Orange can do the same.

Bans do not eliminate demand -- they increase risk by driving consumers toward unregulated products that are more likely to be mislabeled, contaminated, or sold without age restrictions.

My request is simple: please reject Ordinance No. 01-26 if it includes a blanket kratom ban, avoid conflating natural kratom leaf with 7-OH isolates, and instead pursue common-sense regulation that protects residents while respecting adult choice and supporting responsible businesses.

Thank you for your time and thoughtful consideration. I would be happy to speak with City staff or Council members directly and provide additional information and consumer perspectives.

Respectfully,  
Justin Wolf  
Founder & CEO, New Brew

**David Woolf**

Location:

Submitted At: 9:36am 01-27-26

I oppose Ordinance No. 01-26 banning all kratom products in the City of Orange. Please protect the safe, plain leaf Kratom. My wife, Melody, has had a very positive experience with it. This is her story: My name is Melody Woolf, and I've been working on kratom advocacy at the local, state, and now federal level, focusing on reasonable policy and responsible regulation. Most recently, I participated in the July 29 HHS-FDA joint press

briefing, where I was invited to the stage by the FDA Commissioner. I spoke about the benefits of kratom, shared how it has positively impacted my family, and clarified how it differs from the dangers associated with opioids. I also highlighted the importance of science-based regulation to protect consumers while ensuring access to safe, legal products.

On a personal note, I've lived with chronic pain for over 20 years and have several painful conditions. For eight years, when my kids were in elementary school, they had to keep a fan on in their room at night just to sleep because I was crying in pain nearly every night. Kratom has allowed me to reclaim my life, care for my family, and function without being debilitated by pain.

In 2022, when my daughter and son-in-law's childcare shut down just before paternity leave, I was able to step in and care for my granddaughter for a year. I gladly moved in with them to help. The same thing happened this past summer: I watched my granddaughter all summer long, taking her to the zoo every week—the same zoo where, years ago, my kids had to push me around in a wheelchair, and now I was chasing my granddaughter around it. Kratom made that possible.

There are 50 to 100 million chronic pain patients in the United States. Every person with pain should have every tool in the toolbox available to manage their condition safely. Everybody is only one accident or diagnosis away from living with chronic pain. Please remove 708 and protect kratom with reasonable, science-based regulations so that patients like me and millions of others can continue to live productive, meaningful lives.

For more information and the related science, please see her LinkedIn profile:

[https://www.linkedin.com/in/melody-woolf-](https://www.linkedin.com/in/melody-woolf-366a7b146?utm_source=share&utm_campaign=share_via&utm_content=profile&utm_medium=ios_app)

[366a7b146?utm\\_source=share&utm\\_campaign=share\\_via&utm\\_content=profile&utm\\_medium=ios\\_app](https://www.linkedin.com/in/melody-woolf-366a7b146?utm_source=share&utm_campaign=share_via&utm_content=profile&utm_medium=ios_app)

### **Guest User**

Location:

Submitted At: 2:00pm 01-26-26

I oppose Ordinance No. 01-26 banning all kratom products in the City of Orange. This proposal relies on broad federal agency statements and conflates ordinary kratom leaf with high-risk concentrated products such as 7-hydroxymitragynine, without distinction. California has no statewide kratom statute, and Orange County itself chose regulation rather than a total ban. An outright prohibition ignores less restrictive alternatives like age limits, product standards, and enforcement against specific high-risk products. I urge the City Council to reject a blanket ban and pursue a narrowly tailored, evidence-based regulatory approach instead.

Marcelle

### **Stephen McIntosh**

Location:

Submitted At: 7:15am 01-26-26

To the City Council and Director of Code Enforcement:

My name is Stephen McIntosh, I spoke at the 1st reading of this agenda item as a chronic pain patient who uses kratom to manage my chronic pain. I won't spend your valuable time repeating what I said in the meeting here.

I would like to add a few items as they came to mind while listening to testimony from staff, and/or had time to think about them since the last meeting.

First: It is true that kratom has no approved medical purpose. This is because no dietary supplement is approved for specific medical purposes, though consumers do routinely take them for some benefit. Only drugs that go through the FDA New Drug Application process are approved for a specific purpose which allows vendors to make approved health claims such as fitness for a particular purpose. This is not a flaw or detriment, but by design under the Dietary Supplement Health and Education Act (1994) that sets a very different standard for dietary supplements that may be helpful. It is why they carry the notification "These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease."

Second, for all FDA has said about kratom in media, by its own admission it has not made a determination about the safety of kratom when asked under oath. In the Federal Case "3:23-cr-00179-TWR Page ID.1032 Exhibit 6; United States of America, Plaintiff, v. Nine2Five, LLC (1) Sebastian Guthery (2), Defendants" the US attorney told the judge "They [FDA] have refused to provide us with witnesses or documents to support our position. The reason they gave was that they have not yet made a determination regarding whether kratom is dangerous."

Since this admission, it has conducted the Single Ascending Dose Study where test subjects were given up to 12 grams of botanical kratom and none experienced a severe adverse effect. The results are available as Trial NCT06072170 at: <https://cdek.pharmacy.purdue.edu/trial/NCT06072170/>

The FDA was also chastised by HHS in 2018 by then Undersec. Dr. Giroir for submissions to prohibit kratom as "embarrassingly poor evidence and data" when those were withdrawn by HHS.

CDPH is, at present, using these exact claims from FDA to justify their action, which FDA refused to make under oath, doesn't align with their newer studies, and that they have been chastised for in the past.

CA Narcotics Officers Assn, American Medical Assn (Res. 515), and the US Nat. Inst. for Drug Addiction support availability of botanical kratom for adults and further research.

I am again imploring you to re-consider this Ordinance to limit itself to adulterated high "7-OH" products and to exempt botanical kratom.

Doing so would create an ordinance in the City that is compatible with both SB 578 and AB 1088 that are progressing through the legislature with considerable support from legislators and members of the general public. These bills and the OC Ordinance limit sales to 21+, bar 7-OH products from sale, and prohibit products attractive to children (similar to regulations for marketing/labeling alcohol or tobacco).

It would allow for individuals such as myself who use it for important purposes, sometimes as a last resort or due to being under-treated by their limited medical options to still obtain botanical kratom which has been in regular sale since at least 2000 and centuries of indigenous use.

Thank you again.

**Abdullah Mamun**

Location:

Submitted At: 10:57am 01-24-26

To Whom It May Concern:

I am Abdullah Mamun, the owner of Authentic Kratom. For the past 12 years, I have operated as a responsible kratom retailer, committed to consumer safety, transparency, and regulatory compliance. I appreciate the City of Orange for bringing this important matter forward for discussion. I plan to attend in-person, but just in case sending my comment prior hand.

I respectfully oppose the proposed ordinance to ban "kratom products," as the current language lacks clarity and risks unintentionally prohibiting natural kratom, which has been safely used by millions of Americans for decades. I believe this issue requires careful distinction between natural kratom and synthetic 7-hydroxymitragynine (commonly known as 7-OH) products.

Kratom is a natural botanical derived from *Mitragyna speciosa*, a plant belonging to the same plant family as coffee (Rubiaceae). Traditionally, kratom leaves are brewed into tea and consumed in many parts of Southeast Asia and the United States. Many consumers use kratom for energy, focus, and overall wellness, and in my personal experience, it has been helpful in managing chronic back discomfort.

Kratom contains multiple naturally occurring alkaloids, the primary ones being mitragynine and 7-hydroxymitragynine (7-OH). In natural kratom leaf powder, capsules, and even extracts, mitragynine is the dominant alkaloid, while 7-OH is present only in trace amounts. I have included laboratory test results demonstrating the full alkaloid profile of our products, which confirms these trace levels.



In contrast, around 2023, certain manufacturers began producing synthetic pills/liquids labeled as “7-OH”, containing unnaturally high concentrations of 7-hydroxymitragynine. These products do not reflect the natural composition of kratom and represent a fundamentally different—and far more concerning—category.

Research conducted by Dr. Chris McCurdy of the University of Florida College of Pharmacy, a leading authority in kratom science, has identified unknown and potentially dangerous chemical constituents in these synthetic 7-OH products (see attached study). Additionally, a comprehensive 8-factor abuse liability analysis conducted by Dr. Jack Henningfield and colleagues concluded that synthetic 7-OH presents a significantly elevated risk profile compared to natural kratom (see attached).

Furthermore, during a public press conference on July 29, 2025, the U.S. Food and Drug Administration (FDA) explicitly stated that natural kratom containing trace levels of 7-OH is not their regulatory target, and instead recommended that the DEA focus enforcement efforts on banning synthetic 7-OH products.

In summary, the emerging public health concerns are not caused by natural kratom, but rather by synthetic, chemically manipulated 7-OH products. I strongly urge the City of Orange to consider legislation that specifically bans synthetic 7-OH, while preserving legal access to natural kratom for the thousands of responsible adults who rely on it to maintain their quality of life—particularly when traditional treatments have failed.

That said, I fully support reasonable regulation of kratom, including strict age requirements, proper labeling, laboratory testing, and consumer education. At Authentic Kratom, we already enforce a minimum purchase age of 21, provide transparent labeling, and conduct rigorous third-party laboratory testing.

Thank you for your time and thoughtful consideration.

Abdullah

#### **Guest User**

Location:

Submitted At: 2:20pm 01-23-26

I urge you to reconsider this ordinance that would take away many chronic pain patients' quality of life. My kratom story: After waking up one day in 2005, paralyzed from my neck down, I was eventually diagnosed with Transverse Myelitis, and became a chronic pain patient. For years, I was able to manage my chronic pain with prescription medications, but eventually with more DEA cutbacks and new regulations over the years those were no longer an option for me. I was left to endure living in pain every single second of every single day just like so many other chronic pain patients in the same position. Luckily I discovered whole leaf kratom powder in May of 2019. I've been consuming it responsibly for 6 years and it has granted me a second chance at life! I no longer suffer every day, I can get out of bed and be a mom! I can go to school functions run errands, go to the store, and just live life without suffering. Though I regained mobility I still face many physical limitations, however I'm no longer confined by constant pain. Kratom gave me my life back. My story is just one of many chronic pain patients that have been able to manage their pain with kratom.

There is a big difference between natural whole-leaf kratom VS the semi-synthetic 7-OH products being marketed as kratom. I've been encouraged to see even the FDA has stepped in, not only to educate the public on this distinction, but also to warn about the risks of 7-OH. They've made it clear their concern is with 7-OH products, NOT with whole leaf kratom.

I'm asking you to support regulation instead of prohibition and keep natural, whole-leaf kratom legal. We need clear safety standards such as age restrictions, mandatory lab testing, accurate labeling, and limits on 7-hydroxymitragynine (7-OH). These are the kinds of measures that protect public health while preserving the freedom of choice for responsible adults.

Thank you so much for your time and letting me use my voice to represent the many others in the chronic pain community.

Sincerely, Jennifer Gillis

#### **Guest User**

Location:

Submitted At: 10:12am 01-23-26

Dear Members of the City Council,

There is a critical scientific difference between whole-leaf kratom and the products being sold today as "7-hydroxymitragynine," or 7-OH.

Whole-leaf kratom is simply the dried leaf of *Mitragyna speciosa*. Its primary alkaloid is mitragynine. When someone consumes kratom, the human body naturally converts only a very small amount-typically well under one percent-into 7-OH through normal liver metabolism. This process is slow and self-limiting.

By contrast, the 7-OH products now appearing on the market contain laboratory-isolated or chemically converted 7-hydroxymitragynine in amounts far beyond what the human body could ever produce from kratom leaf. At those levels, 7-OH behaves much more like a conventional opioid and carries much higher risk.

When these high-potency 7-OH products are lumped with natural kratom, it leads to misleading risk assessments and poor public policy. Regulating or restricting 7-OH does not require banning whole-leaf kratom-and that distinction matters, because kratom saved my life.

From 2008 to 2019, I lived trapped in FDA-approved pain pills, benzodiazepines, and muscle relaxers prescribed for my degenerative disc disease. Over 11 years, chronic pain management turned into full-blown addiction. What began as dependency slowly became a cycle of misuse, desperation, and shame.

In April of 2019, I was dismissed from pain management after failing a required pill count. I was short on my medication and couldn't find what I needed. Cut off from prescriptions, I turned to the streets, and in that desperation, I slipped into cocaine use while trying to find another doctor.

By June of 2019, I was in withdrawal and at rock bottom when I watched a documentary called *A Leaf of Faith*. That moment changed everything. The next day, I walked into a shop, showed my ID, and bought whole-leaf kratom..not synthetic 7-OH.

Kratom quieted the relentless cravings. The voice that kept saying, "one more pill, one more snort, one more escape," finally went silent. For the first time in over a decade, I felt stable. Kratom gave me the breathing room to heal and allowed me to rebuild my life.

I have not returned to pain management in over six and a half years. Today, I am a thriving mother, a first-time grandmother, and a contributing member of society. I am no longer a burden to my children. I am an example of recovery.

I will always be grateful that I had access to safe, lab-tested, whole-leaf kratom. And that is why I speak out to protect others who are still fighting for their lives.

Misty Brown