

Gentlemen,

Thank you for allowing me to address this important issue concerning Kratom Legislation. My name is Lance Dyer I am the Director of the Dakota Dyer Foundation based in Georgia. We are an anti Synthetic Drug Organization that has been fighting the Synthetic Industry since 2012. Over the past 12 months we have noticed a dangerous trend in the Kratom industry. Below you will find attached photographs and statements from Kratom Growers in Indonesia, Wholesalers here in the US and spokespersons for the American Kratom Association confirming exactly what I am sharing with you today. I am not speaking today to discuss the pro's or con's of Kratom. I am addressing the mislabeling, misbranding, adulteration of this product as condoned by the Kratom Industry. Kratom is listed as a drug of concern by the Federal Drug Enforcement Agency and the United State Department of Justice [http://www.dea.gov/pr/multimedia-library/publications/drug\\_of\\_abuse.pdf#page=84](http://www.dea.gov/pr/multimedia-library/publications/drug_of_abuse.pdf#page=84) Kratom has been reportedly linked to 3 deaths most recently in Georgia John Eden May 3 2015. It has been linked to 9 deaths in Sweden, Guy Garcia of Denver [Denver family warns others about dangers of legal herbal stimulant](#) Leah Nicole Waite of Longview, Washington [http://tdn.com/news/local/coroner-role-of-kratom-in-longview-mom-s-death-undetermined/article\\_0822689c-b74e-11e2-a636-0019bb2963f4.html](http://tdn.com/news/local/coroner-role-of-kratom-in-longview-mom-s-death-undetermined/article_0822689c-b74e-11e2-a636-0019bb2963f4.html) and many more. The Kratom community would have you believe that there are no reported deaths due to Kratom even when Death Certificates show other wise. Over the past 8 months we have seen a high adulteration rate of Kratom, it is being laced with Synthetic Cannabinoids and sold as Kratom. Is this an industry standard or rouge dealers trying to promote their product. There is no factual information available to make an assumption either way. What is known is its being used as a vehicle of delivery for Synthetic Cannabinoids ie: Spice, K-2, Synthetic Marijuana.

Growers and Importation.

Kratom tree's are grown in Thailand where the leaves are pick and ground up in most cases for shipment across the world, yet it is illegal in the country this tree is indigenous too. In 1943 the Government of Thailand made it Illegal. Malaysia followed in 1953. Tennessee, Indiana, Wisconsin, Louisiana and Vermont have all taken steps to ban this substance. Many other states will be considering this in the 2016 legislative session. Once Kratom is picked , usually in a rural/jungle setting it is dried and processed in open air huts next to the fields. there is zero quality control as you will see in the video's, you see the open air area's with little or no insect control, nothing to prevent mold or mildew from forming on these leaves. Dirty processing equipment and no feet covering on the people walking on it. Standards that are mandatory in the United States. Once these packages are filled they are labeled with a sticker that says "Not For Human consumption" the same warning we see on packages of Synthetic Marijuana. These packages are then smuggled into the US or this mislabeling and misbranding us used to try and get past the Customs or DHL inspectors. Just yesterday in a conversation with Paul Kemp a spokesperson for the American Kratom Association he recommended getting around the Law instead of conforming to it or complying with it. This is the

mentality of members of the Kratom industry, their greed and willingness to break local, state, and federal laws over shadows the possibility of this being a viable product. I wish to point out several months ago a flyer was sent out to many head shops and smoke shops that advised using the "Not for Human Consumption" on all Kratom bags, The address and phone number on the flyer were the same as Susan Ashe's and the American Kratom Association and the Botanical Legal Defense, when asked about this they denied all knowledge of this but within a matter of a couple of months this is exactly what we see being done to circumvent the importation process. The Federal Food and Drug Administration Import Alert list 54-15 list a company Drd Global Inc. LLC 1413 Highpoint Va this company is owned by David Darrin a major supporter of the American Kratom Association. [http://www.accessdata.fda.gov/cms\\_ia/importalert\\_1137.html](http://www.accessdata.fda.gov/cms_ia/importalert_1137.html)

One the FDA Import alert list you will see many overseas companies and some from here in the US this is an attempt to get a handle on what is being imported into this country, is it safe, what are its contents, and in this day and age of global terrorism we can ill afford to have an unchecked smuggling route coming from countries with known terrorist ties.

We ask that this board keep in place and enforce the Great State of Wisconsin's current law and request an independent study be conducted by an institute of high learning in Wisconsin to evaluate the safeness, and viability of Kratom. As there is almost no scientific evidence concerning the effects on the human body or its long term effects, It would be only prudent for such a study to be done and the information conveyed to the Wisconsin poisons Control Office and Department of Health to be used in the case of hospitalizations or deaths that possibly could occur.

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Below you will find a link to a facebook page to one of the major growers and sellers of Kratom I would like to direct your attention to his pictures and video's that show how Kratom is manufactured and processed and how the "Not For Human Consumption " labels are used to smuggle this into our country. There are many more just like this grower/importer  
<https://www.facebook.com/beng.bengs.7?fref=jewel>