

**Subject:** Technical Clarification Regarding Toxicological Statements in Council File 25-0002-S82

**To:** Los Angeles City Clerk (Council and Public Services); Office of the City Attorney

**From:** Dr. Michele Ross, PhD, MBA, Principal Scientist, Infused Partners

**Date:** February 5, 2026

**Re:** Council File 25-0002-S82 – Rules, Elections and Intergovernmental Relations

I am submitting this memorandum in my capacity as an independent scientist specializing in neuropharmacology and addiction science to provide technical clarification regarding certain toxicological and pharmacological statements referenced in Council File 25-0002-S82, scheduled for consideration by the Rules, Elections and Intergovernmental Relations Committee.

This memorandum is limited to scientific accuracy. It does not address policy preferences, enforcement strategy, or legislative authority.

### **Summary of clarification**

Council File 25-0002-S82 references six overdose deaths described as being “due to 7-hydroxymitragynine (7-OH) ingestion” and relies on a public health press release characterizing these fatalities as “tied to synthetic kratom.” Based on publicly available toxicological descriptions, this language overstates what can be concluded from the evidence presented.

The reported cases are described as polysubstance overdoses in which 7-hydroxymitragynine was detected as *present*. The available summaries do not report quantitative concentrations, do not identify 7-OH as a primary or contributing cause of death, and do not establish a causal mechanism attributable to 7-OH.

### **Detection versus causation**

In forensic toxicology, detection of a substance does not, by itself, establish causation. Polysubstance overdose cases frequently involve the presence of multiple compounds, some of which may be incidental or pharmacologically secondary relative to the cause of death.

Absent quantitative concentration data, toxic thresholds, or formal causal attribution, describing deaths as “due to 7-OH ingestion” exceeds what the toxicological record supports. A more precise characterization is that 7-hydroxymitragynine was detected in the context of polysubstance overdose.

## **Interpretation of 7-hydroxymitragynine presence**

The resolution language further characterizes 7-hydroxymitragynine as a “synthetic kratom compound” and appears to treat detection of 7-OH as evidence of exposure to synthetic or isolated 7-OH products. Scientifically, this inference is not supported without additional context.

7-Hydroxymitragynine is a known kratom alkaloid that may be present at low levels in the plant and may also be formed metabolically from mitragynine in vivo. Accordingly, detection of 7-OH in toxicology results does not, by itself, distinguish between consumption of whole-leaf kratom, kratom extracts, or isolated or synthetic 7-OH formulations. Such distinctions require validated analytical methods, quantitative data, and product-specific investigation.

## **Importance of precision**

Accurate distinction between detection and causation, and between compound presence and product type, is essential in legislative and regulatory contexts. Precision in these areas helps ensure that policy deliberations are grounded in the scientific record and reduces the risk of overgeneralization from limited or non-specific data.

## **Request**

I respectfully request that the City review and, if appropriate, clarify the referenced language in Council File 25-0002-S82 to accurately reflect the available toxicological evidence, particularly with respect to polysubstance involvement, the distinction between presence and causation, and the interpretation of 7-hydroxymitragynine (7-OH) detection.

Respectfully submitted,

**Dr. Michele Ross, PhD, MBA**

Principal Scientist, Infused Partners

Neuropharmacologist and Addiction Expert