

Commentary & Correspondence

Saying no to GMP Cannabis

From John Gilmore (in response to the Epidiolex story at BeyondTHC.com):

GMP stands for "Good Manufacturing Practices." Requiring vendors to follow "Good Manufacturing Practices" is a theoretically good idea that has gone extremely wrong. The more I have looked into the "GMP" regulations, the more I am convinced it is a cartel-creating scam. It seems to me that GMP certification is the reason that it's illegal for US residents to buy drugs from Canadian or Indian pharmacies. FDA is careful in its public statements to never exactly say why "Canadian pharmacies" are illegal to buy from (in a world of generally free trade across borders), but this seems to be the underlying regulation that is being violated.

FDA has decided that it doesn't matter whether the drugs are pure — what matters is whether reams of paperwork got done before they were made. (At MAPS we have already investigated, and determined that you can't do the paperwork after the drugs are already made and are already tested to be pure. A drug that wasn't "born GMP" can never be "made GMP" later.)

The FDA is not doing this to protect the public. Instead they have been captured by the drug manufacturers and made to "force" the manufacturers to do all this expensive paperwork to protect the drug makers' oligopoly from foreign competition. (Like the airlines captured FAA and later TSA, which "forced" the airlines to check ID cards, "incidentally" preventing people from reselling airline tickets, which made excessive "change fees" and "non refundable tickets" viable revenue sources. Or how the monopoly telcos captured the FCC and got fiber optics exempted from the requirement to share their monopoly facilities with their competitors, thus giving themselves a monopoly on any Internet access faster than DSL.)

So, I see "GMP" cannabis as evil — the price of joining the cartel that keeps US drug prices artificially high.

By the way, MAPS has been soliciting bids to make MDMA for our clinical trials. The GMP MDMA costs something like 3x the price of non-GMP MDMA. But most synthesis labs won't even agree to do the onerous GMP paperwork, even if you overpay them for doing it.

It will be quite easy for the unregulated "free market" or "black market" to underprice FDA-legal GMP marijuana, if that ever happens. I think it's more likely that most patients will just use legal recreational marijuana that isn't made to GMP standards — assuming we follow through and manage to legalize recreational marijuana throughout the country.

PS: I would be happy to learn about anything I am getting wrong.

Deferred Entry of Judgment

By Sandy Untermeyer

About a year ago, I was put through some marijuana re-education when I had to attend court-ordered Deferred Entry of Judgment classes. Every Wednesday night for 18 weeks, I met with a health department leader and other unfortunate drug war casualties. The class would start off with roll call and paying a weekly fee. We would watch a video on addiction or the teacher would read some course work to us. Then he would give us some questions that we were required to answer. Most of them were things like, "How does your addiction affect your daily life?"

The teacher started singling me out by reading my answers, thinking that I would buckle from public shame.

At first I quietly just didn't answer most of the questions or I just wrote in, "I'm not addicted. I use cannabis as a medicine. It helps me control my migraines." The teacher started singling me out by reading my answers, thinking that I would buckle from public shame.

It's important to realize that the attendees in the Deferred Entry of Judgment classes were given a free pass from the court and they are scared of going to jail.

Defendants who are offered a DEJ have no prior record or they have stayed out of trouble for more than five years and have no violent crime history. A DEJ means that after you complete the program, you can say that you were never convicted.

It's a way to run a lot of drug related cases quickly through the judicial system using fear. If you don't make it through the program the court will order you to jail for whatever the sentence was without any hearing because you have already pled guilty.

That is a scary prospect because typically the DA overcharges a defendant in order to entice a plea deal.

But I didn't buckle when I was presented with quiz after quiz that asked me to admit

You do what you have to do, and so they answered the questions as if they believed they were addicted.

to addiction. I stood up for myself. Without cannabis, my life would again center around debilitating migraines, which honestly were driving me toward suicide.

After I started speaking up, I was approached by almost everyone in the class. They all had heartbreaking stories and also felt like they were being herded through a BS program, but you do what you have to do, and so they answered the questions as if they believed they were addicted.

In the end, the instructor graduated me early to get rid of me and didn't even pee test me because he knew it would come up positive for THC. He was aware of my court documents stating that I could not only smoke cannabis but grow it.

Under the guise of "treatment," what they were doing was working on creating statistics that would support a HUGE money grab for more services and create a story of crisis that doesn't really exist!

Fortune Magazine reported in 2012 that Bain Capital (yes, the company that cleaning Mitt Romney used to run) "is trying to consolidate an unlikely industry: addiction treatment centers."

Bain purchased an outfit called CRC Health Group for \$723 million in 2006, and proceeded to go on a shopping spree, snapping up nearly 20 new treatment facilities over the next two years. The company took a breather during the financial crisis, but in 2011 resumed its buying binge with the purchase of some smaller treatment centers.

Sandy Untermeyer was growing marijuana legally for a California collective. The DA did not want to charge her but a zealous cop exerted pressure and she was prosecuted. She was advised by a lawyer to take the deferred entry of judgment and go through the "treatment" charade. Looking back, she regrets the decision.

Wrestling With Self-Promoters

The Washington Generals were — maybe still are — a basketball team that toured with and played against the Harlem Globetrotters. The Washington Generals would give it their all but lose because the Globetrotters had superior skills.

A pudgy man named Kevin Sabet, 30-something, has invented a similar niche for himself, jet-setting around to debate advocates of drug policy reform. Sabet can never win because the reformers have superior arguments.

"I want to thank the Commonwealth Club for inviting me" was the first of many misleading statements Sabet made when he came to San Francisco to debate Clint Werner, the author of *Marijuana: Gateway to Health*. The Commonwealth Club is an institution that stages talks by "thought leaders." Club members can attend talks for free, members of the public can buy tickets. The presentations are taped for broadcast on National Public Radio.

Sabet had invited himself. It was he who contacted the Commonwealth Club to request a speaking slot to promote "Smart Approaches to Marijuana," an organization he launched with former Rhode Island Congressman Patrick Kennedy. Sabet had been employed by the Drug Czar's office from 2009 through 2011. Either he was not rehired or he chose to work instead for the University of Florida College of Medicine, Division of Addiction Medicine, Department of Psychiatry.

An off-hand remark by Werner — "I'd love to debate him!" — to a Commonwealth Club official was conveyed to Sabet, who parlayed it into a twofer by arranging a second appearance for himself in the near future to promote his inevitable book, *Smart Approaches to Marijuana Regulation*.

Sabet's smart approach is to divert the money Americans are no longer willing and/or able to spend incarcerating marijuana users and direct it into the bank accounts of therapists, counselors, drug-court bureaucrats and other "helping professionals." In brief, he's a shill for the Treatment Racket.



KEVIN SABET

Werner was anticipating a serious give-and-take in which assertions are documented, challenged, defended, and refuted or substantiated in coherent volleys of facts and ideas. The moderator, a local radio personality named Rose Aguillar, asked Werner to begin by stating why he supports marijuana legalization. Werner did so eloquently, starting with his observation of the herb's appetite-inducing properties as he nursed a friend with AIDS in 1991. He succinctly summarized what scientists and doctors have learned in the ensuing years about marijuana as medicine. These points were the last Werner would get to make without interruption, and the first of many that Sabet would avoid responding to.

Unfortunately for Werner (and the audience), there was no structure to the debate. Ms Aguillar abdicated by telling the adversaries to "have a conversation." This gave Sabet, who is rude and aggressive, license



CLINT WERNER

to cut in whenever Werner, who is polite and restrained, was about to complete a thought.

It was like watching a boxing match where one fighter, knowing he's outclassed, keeps grabbing and clenching, getting in punches to the kidney — but there was no ref stepping in to break the clinches. Frustrated members of the audience began directing comments like "Let him answer!" at Sabet. Ms Aguillar kept on smiling to herself as she silently leafed through the cards on which people had submitted questions. Occasionally she would read one aloud, without directing it at either speaker. If Werner began to respond, Sabet would cut in. If Werner then tried to complete his statement (which involves raising one's voice), Sabet would look offended, as if victimized by incivility.

When the show was over he complained to the Commonwealth Club hosts that he had been dissed by pot partisans in the audience, and the officials promised to make amends in the near future by having him return to plug his book.

Sabet is a self-promoting nonentity who has no audience or constituency of his own. Many reformers are keen to debate him, but they should remember the words of George Bernard Shaw: "Never wrestle with pigs. You get dirty and the pig likes it."



GRAPHIC IS FROM THE JACKET OF A BOOK BY ROGER "DROODLES" PRICE.