

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 peek 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 cleaned up 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 Aguilar, 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 Aguilar abdicated by telling the adversaries to "have a conversation." This gave Sabet, who is rude and aggressive, license

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 Aguilar 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.

Hemp Russet Mites = Grief

Towards the end of the harvest season, A.J. emailed from northernmost California:

I saw that you wrote an article about a trimmer getting sick from Avid. Well I thought I'd write you because Avid is now this looming element in my life and I thought you might be interested in this. So Russet Mites and/or Broad Mites seem to be this year's epidemic in my small town. They are microscopic, easy to misdiagnose, and can take out an entire garden. They can also spread from dried product and infest gardens.

The most common product, it seems, that is used to defend against these pests is Avid. It's available under the counter at garden stores and via Amazon. I have the pest and Avid was recommended to me but when I got it in the mail and read the instructions I had serious concerns about using it. I am going to continue to pursue other routes of action because it seems so toxic, to the applicant, the environment and obviously the end user. However, I'm terrified that if I don't use it I'll lose everything! Maybe this isn't a new thing, but it's new to me and this community. Also at the garden store the guy who I talked to about it seemed to agree that it was this year's plague and most people are reaching for the highly toxic stuff.

We asked A.J. what she knew about the destruction wrought by the hemp russet mite. She replied:

They stunt the plant, the leaves turn yellow and drop while the mites suck the resin out of the developing flowers. Amazing how destructive these invisible pests are. There are a few things the leaves will do to give you a sure ID and of course watching the flowers shrivel tells you what you're dealing with. Oh, and when you hear that your neighbors have it, it's usually a good sign that you have it, too. It can easily be confused as a nutrient defi-

ciency, rust, anything, because they are microscopic. It also spreads fast. I was told by my friend that I should either use Avid or kiss my garden good bye. Wow!

I've been doing lots of research on this and it turns out that in Canada and New Zealand, Avid is used on commercial food crops and in some cases it's used in the US, too. It is regularly sold under the counter at garden centers. I read an interesting article written by someone in Berkeley about this. The family of the mite is the Eriophyoid and I found the most interesting information by googling that. These things spread easily, by wind, on clothes, etc., and the eggs can overwinter. Who needs CAMP when you got russet mites?

On webforums addressing this, lots of the posts are from this year and last year. I also read that Colorado is dealing with this big time. That's not surprising. One thing I'm thinking about are seasonal workers (who are mostly women) who deal with this stuff day after day after day, without properly protecting themselves from residues that they probably don't even know are present. The warning label on Avid directly says that exposure could lead to birth defects! I've never asked an employer what they've sprayed on their plants, how long ago the application was applied and how I can protect myself from its effects. I've never thought about it before but it's a serious concern.

A few days later A.J. added:

I've decided to not spray with Avid and try all of the organic stuff I have around until I run out. I just don't have the money to keep at it, especially since I don't have confidence it's going to help. I haven't found any place to buy those beneficial mites, but I'll keep my eyes and ears open. I heard last night that "everyone on the river" has the russet mites. I think this is a bit of an exaggeration but it leads me to believe that it is incredibly widespread.



HEMP RUSSET MITES (*ACULOPS CANNABICOLA*) are visible on the petiole of a cannabis leaf (photo at left by Karl Hillig) and in an enlarged photomicrograph (above) made "in a secure greenhouse at the University of Indiana." Source: The Cannabis Encyclopedia by Jorge Cervantes



This Appalling Pest

By Karl Hillig

Hemp russet mites are not well-known but this appalling pest is growing in infamy because it is so hard to control. The mites are very small reaching only 0.2 mm in length and they have just two pairs of legs attached to their pale beige bodies. Even though hemp russet mites are virtually impossible to see with the naked eye, they are easy to distinguish from other destructive mites because they leave no webbing. At 80° F (27°C) hemp russet mites achieve a 30-day life cycle.

Damage: Feeds on all types of cannabis plants. They live and feed mainly on leaves, petioles, and meristems. Feeding damage causes leaflets to curl at edges followed by chlorosis and necrosis. Leaves and petioles become brittle. Infestation turns leaves beige with hemp russet mite bodies! Mites feed on female stigmas rendering them sterile. They also consume resin glands which can reduce resin production severely. Hemp russet mites feed on cannabis plants until host is dead. They congregate on the upper part of the plant as it dies. Hemp russet mites vector viruses.

Cause: Introduced to gardens by unsanitary practices, contaminated stock and bad luck. Hemp russet mites hide on plants indoors and in greenhouses. They are believed to overwinter on contaminated seed indoors and outdoors. The minute mites spread easily to nearby plants by splashing water. Wind also carries them greater distances.

Prevention: Keep garden area clean and disinfected. Introduce only pest-free stock into gardens. Disinfect seeds. Keep the garden below 70°F (22°C) and below 50% humidity to slow reproductive process. Remove seriously damaged foliage and plants from garden.

Control: Biological: The fungus *Hirsutella thompsonii* is a pathogen to hemp russet mites, but I have not seen it available commercially.

Sprays: Miticides and sulfur sprays are somewhat effective. Make sure to get complete foliage when spraying.

Deadliness of Downers Documented

Pharmaceutical downers are "associated with premature mortality" (meaning they can kill you dead). A gold-standard study which came to that ominous conclusion was published by the *British Medical Journal* recently, but has been virtually ignored by the mass media.

Investigators led by Scott Weich, MD, a professor of psychiatry at the University of Warwick, concluded that people using pharmaceuticals marketed as sleeping pills (Ambien, Sonata, Lunesta) and anti-anxiety meds (Valium and Xanax) greatly increase their risk of dying within seven years.

The records revealed an astonishing four "excess deaths" per hundred users of pharmaceutical downers!

Weich's team looked at primary-care prescription records from 273 practices in the UK — 34,727 patients who'd been prescribed downers and 69,418 controls. They adjusted for "confounding" factors such as age, cigarette smoking, use of other drugs (including alcohol), and socioeconomic status.

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maceutical downers! The harm was found to be dose-dependent, meaning the less you take, the better off you are.

So... Get off them if you can. Use only for long airplane rides.

From the abstract in the BMJ

Participants: 34,727 patients aged 16 years and older first prescribed anxiolytic or hypnotic drugs, or both, between 1998 and 2001, and 69,418 patients with no prescriptions for such drugs (controls) matched by age, sex, and practice. Patients were followed-up for a mean of 7.6 years (range 0.1–13.4 years).

Main outcome: All cause mortality ascertained from practice records.

Results: Physical and psychiatric comorbidities and prescribing of non-study drugs were significantly more prevalent among those prescribed study drugs than among controls. The age adjusted hazard ratio for mortality during the whole follow-up period for use of any study drug in the first year after recruitment was 3.46 (95% confidence interval 3.34 to 3.59) and 3.32 (3.19 to 3.45) after adjusting for other potential confounders. Dose-response associations were found for all three classes of study drugs (benzodiazepines, Z drugs (zaleplon, zolpidem, and zopiclone), and other drugs).

After excluding deaths in the first year, there were approximately four excess deaths linked to drug use per 100 people followed for an average of 7.6 years after their first prescription.

Conclusions: In this large cohort of

patients attending UK primary care, anxiolytic and hypnotic drugs were associated with significantly increased risk of mortality over a seven year period, after adjusting for a range of potential confounders. As with all observational findings, however, these results are prone to bias arising from unmeasured and residual confounding.

O'Shaughnessy's Summer 2011 published a redwood-standard study, "Cannabis and Insomnia," by Drs. Rolando Tringale and Claudia Jensen. Tringale analyzed 166 patients' records from Jensen's office and concluded: "Patients commonly report that use of cannabis reduces the time it takes them to fall asleep — whether or not insomnia was the complaint with which they presented."

Tringale noted, "the adverse effects of Benzodiazepines such as Xanax include physical dependence and withdrawal, and irritability. Newer hypnotics such as Ambien and Lunesta can cause complex sleep-related behaviors." To which we can now add "excess death."

There is a widespread type of insomnia that cannabis can hardly treat. The cause is economic insecurity — you wake up in the middle of the night worrying about how to pay the bills and that's it, you can't go back to sleep, you just lie there and worry.

Cannabis heavy in myrcene can be helpful, but it can also make your worries more vivid and imaginative. The proper treatment for insomnia of this type is economic security.

The Iraq vet named Lopez who went on a deadly rampage at Fort Hood last year had been denied a PTSD diagnosis but was being treated for "depression and anxiety."

I bet he had not been denied Prozac and Ambien. The Pentagon put out a statement distinguishing Lopez's assignment — driving a truck in a war zone — from combat itself, and denying that he had been wounded. But obviously he had been wounded.

And about that Luna moth featured in the Lunesta ad... Why are they almost extinct? Because an Italian wasp was brought in by "experts" to control a noxious caterpillar that was destroying forests — and the wasp attacked the Luna Moth caterpillar instead.



"The genius of our ruling class is that it has kept a majority of the people from ever questioning the inequity of a system where most people drudge along, paying heavy taxes for which they get nothing in return... We should stop going around babbling about how we're the greatest democracy on earth, when we're not even a democracy. We are a sort of militarised republic." — Gore Vidal

