



July 17, 2026

Admiral Brian Christine, M.D.
Assistant Secretary for Health
Office of the Assistant Secretary for Health
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

**Re: Coordinated, Duplicate, Fictitious, and Financially Incentivized Comments
Submitted to Docket No. HHS-OASH-2026-0232**

Dear Admiral Christine:

On behalf of the American Kratom Association, I am writing to bring to your immediate attention evidence of a coordinated effort by certain 7-hydroxymitragynine ("7-OH") advocates, commercial vendors, and industry-aligned organizations to manipulate the public record associated with the Office of the Assistant Secretary for Health's Request for Information concerning an appropriate threshold level for 7-OH.

The integrity of this docket is particularly important because HHS did not issue a general referendum asking whether consumers like 7-OH products or whether they would prefer that those products remain commercially available. The Department expressly limited its request to scientific information addressing:

1. Whether additional scientific data support the proposed threshold or an alternative threshold, including the concentration or quantity of 7-OH that constitutes an imminent hazard to public safety; and
2. Whether data support alternative methods for expressing or measuring the threshold necessary to avoid imminent harm to public safety.

HHS has stated that the comments received will be transmitted to the Attorney General for consideration in connection with the temporary scheduling process. That makes it essential that the docket is not distorted by fictitious identities, duplicate submissions, compensated participation, or campaigns that falsely characterize anecdotal testimonials as scientific safety evidence.

Evidence of Deliberate Duplicate and Fictitious Comments

Enclosed screenshots from a Reddit forum devoted to 7-OH show commenters openly encouraging individuals to submit multiple comments while concealing that they came from the same person.

One post is titled:

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“You can leave more than one comment!”

The author instructs participants to use an incognito browser, a different email address, a different telephone number, and “obviously use a different name or go anonymous.” The author then states:

“I’ve already left three. Please do this.”

A separate Reddit user states:

“Hell I been commenting anonymously 2–3 times pretending to be a different person each time.”

These are not innocent misunderstandings about the public-comment process. They are explicit instructions to create the false appearance that multiple distinct members of the public submitted comments when, in fact, the comments originated from a single individual.

The apparent purpose is not to provide additional scientific information. It is to inflate the number of comments and manufacture the impression of broader public opposition to the proposed scheduling threshold.

A docket corrupted by such conduct cannot reliably be evaluated by counting comments, comparing the number of comments supporting or opposing an action, or treating each submission as representing a separate person.

A Commercial Vendor Is Offering Store Credit for Comments

The enclosed materials also show that the commercial website 7OH.com is offering customers \$20 in store credit for submitting a comment to the federal docket.

The promotion states:

“GET \$20 IN STORE CREDIT FOR COMMENTING.”

It instructs customers to submit a comment, take a screenshot, provide the email address associated with their 7OH.com account, and submit the screenshot to the company for review. The company then promises to apply the store credit within two to three business days.

This is an extraordinary effort by a financially interested vendor to purchase participation in a federal public-comment process. The offer does not require that the participant possess scientific expertise, submit laboratory data, provide analytical

testing, identify the concentration of 7-OH consumed, report the presence of other alkaloids or ingredients, or disclose adverse events. The apparent qualifying act is simply submitting a comment and proving to the vendor that it was done.

The arrangement creates several serious problems.

First, it gives consumers a direct financial incentive to comment in a manner that may advance the commercial interests of the company issuing the reward.

Second, unless commenters affirmatively disclose the payment or promised store credit, HHS will have no way of knowing that the submission was financially induced.

Third, the reward is being provided in credit for additional 7-OH products, creating a particularly troubling incentive in a proceeding involving products that HHS has identified as dangerous opioids with addiction and public-health risks. HHS has publicly stated that 7-OH, mitragynine pseudoindoxyl, MGM-15, and MGM-16 are dangerous opioids that threaten public safety, while distinguishing these products from natural kratom leaf.

Comments purchased with commercial rewards should not be treated as independent expressions of public opinion, much less as scientific evidence supporting a particular threshold.

Mischaracterizing Consumer Testimonials as “Safety Data”

We are also concerned by advocacy appeals being made by the 7-Hope Alliance telling consumers that their personal experiences with 7-OH constitute “safety data” and urging them to submit those experiences in response to the HHS solicitation.

Consumers have every right to communicate with their government and describe their experiences. But an uncontrolled testimonial is not, standing alone, scientific evidence establishing a safe concentration, dose, serving size, package limit, pharmacokinetic profile, dependence liability, or threshold below which a product does not present an imminent hazard.

A testimonial generally cannot establish:

- The actual quantity or concentration of 7-OH consumed;
- Whether the product contained mitragynine pseudoindoxyl, MGM-15, MGM-16, or other undisclosed compounds;
- Whether the product’s label was accurate;
- Whether the user consumed alcohol, prescription medications, illicit substances, or other products;

- Whether the user developed tolerance, dependence, withdrawal symptoms, or escalating use;
- Whether adverse effects were clinically assessed;
- Whether adverse events were underreported;
- Whether the experience is representative of the broader population; or
- What threshold is scientifically necessary to protect public safety.

Anecdotes may generate hypotheses or identify issues warranting further investigation. They do not substitute for controlled human studies, validated analytical chemistry, toxicology, pharmacology, adverse-event surveillance, dose-response data, or other scientifically reliable evidence.

Portraying consumer testimonials as equivalent to safety data is particularly misleading where the products entered the market without the premarket safety work ordinarily expected for products containing potent opioid-active compounds. The absence of an immediately reported adverse event by a self-selected commenter cannot establish that a particular 7-OH concentration is safe.

Requested HHS Actions

We respectfully request that OASH take appropriate steps to protect the integrity of Docket No. HHS-OASH-2026-0232, including the following:

First, do not evaluate the docket by raw comment volume. The number of comments for or against the proposed threshold should not be treated as evidence of safety, scientific validity, or the prevalence of any particular view.

Second, identify and appropriately account for apparent duplicate submissions. HHS should use available metadata, common language, submission timing, repeated narratives, and other lawful means to identify multiple comments likely originating from the same individual.

Third, separately categorize compensated, form-generated, duplicate, and anecdotal comments. These comments should not be given the same evidentiary weight as peer-reviewed studies, laboratory analyses, pharmacokinetic research, toxicology data, adverse-event datasets, or scientifically supported threshold proposals.

Fourth, remind the public of the limited purpose of the RFI. OASH should make clear that the solicitation seeks scientific evidence concerning the concentration, quantity, and measurement of 7-OH associated with an imminent hazard—not votes, generalized opposition to scheduling, or unsupported claims that any individual experience establishes product safety.

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Fifth, provide the Attorney General with an assessment of docket integrity. When OASH transmits the comments, it should explain the evidence of duplicate-comment campaigns, fictitious identities, commercial inducements, and organized efforts to characterize testimonials as scientific data.

The Scientific Record Must Control

The American Kratom Association strongly supports the right of every citizen to petition the government. That right, however, does not include a right to impersonate multiple people, conceal financial inducements, or deliberately create a false appearance of public participation.

Nor should a commercial industry be allowed to compensate its customers to flood a federal docket and then cite the resulting number of comments as evidence that its products are safe.

HHS and FDA have already explained that the present action addresses dangerous enhanced 7-OH products and specified synthetic derivatives, while not intending to regulate natural kratom leaf that does not contain enhanced levels of 7-OH. The threshold determination should now be based on credible scientific evidence about imminent hazards to public safety—not on an orchestrated popularity contest funded and promoted by companies whose products are directly affected.

We respectfully request confirmation that OASH will evaluate the docket accordingly and will advise the Attorney General that the apparent volume of submissions may have been artificially inflated through duplicate, fictitious, financially incentivized, and coordinated comments.

Thank you for your attention to this serious matter. We are prepared to provide the original images, associated webpages, dates of capture, and any additional documentation that may assist the Department's review.

Sincerely,



Mac Haddow
Senior Fellow on Public Policy
American Kratom Association

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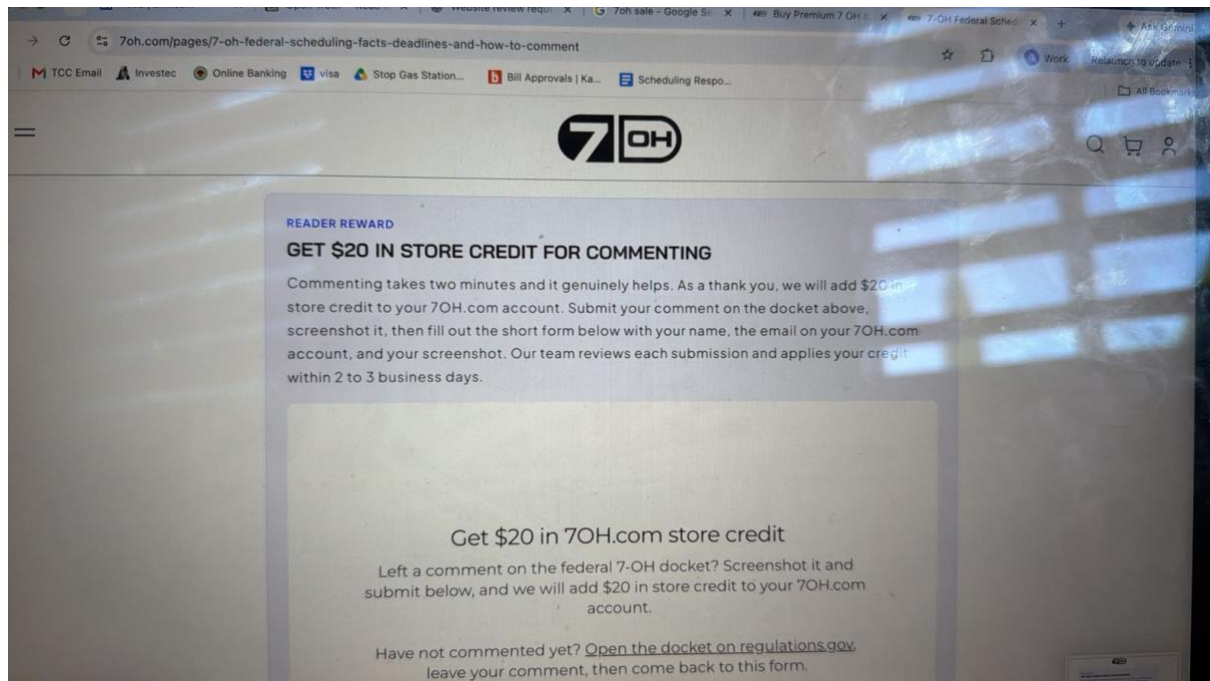
Enclosures

1. **Exhibit A:** Screenshot of 7OH.com offer of \$20 in store credit for submitting a federal docket comment.
2. **Exhibit B:** Reddit post instructing users to employ different names, email addresses, telephone numbers, and anonymous submissions to file multiple comments.
3. **Exhibit C:** Reddit post admitting to filing two or three anonymous comments while pretending to be a different person each time.

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Exhibit A

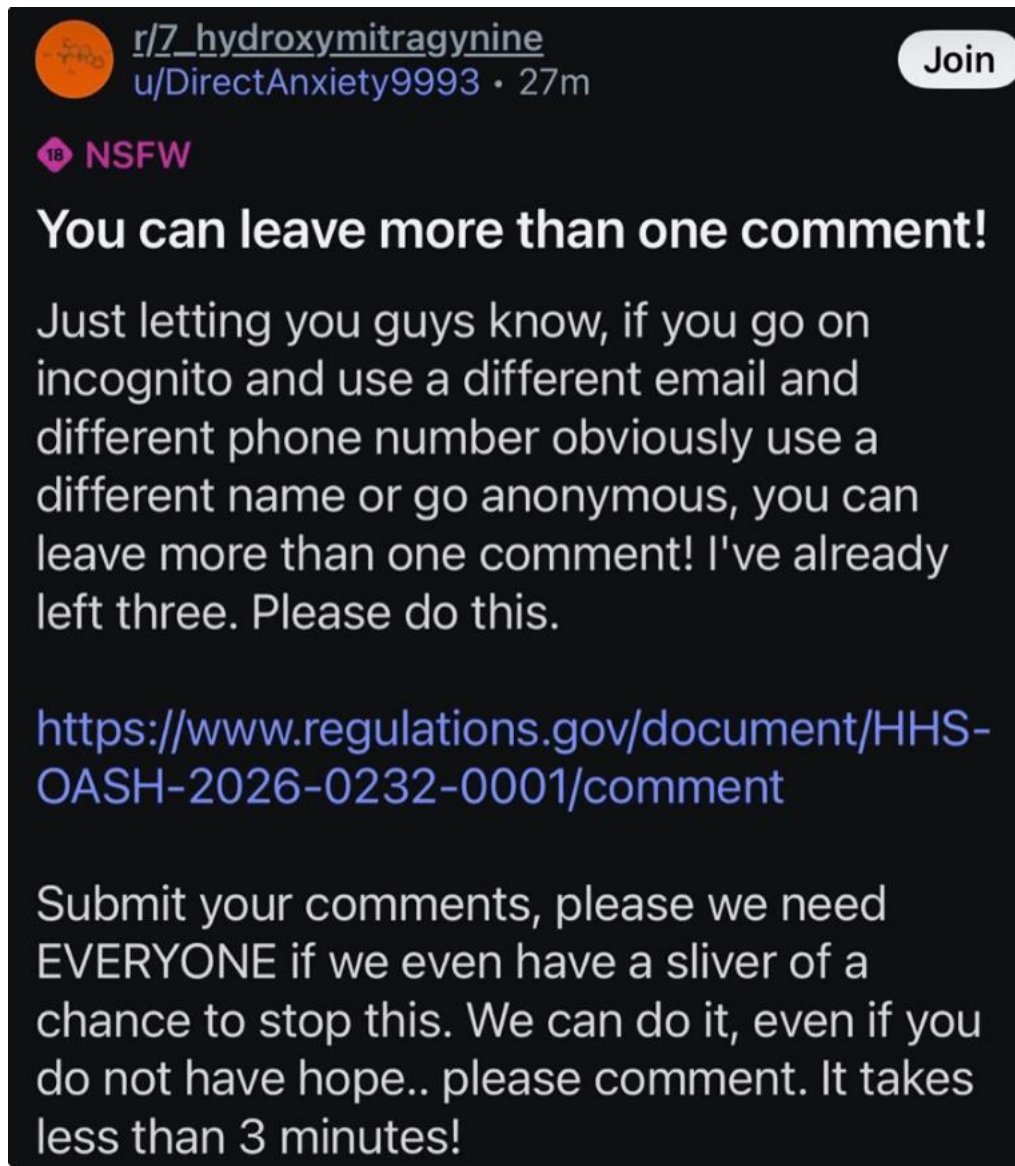
Screenshot of 7OH.com offer of \$20 in store credit for submitting a federal docket comment.



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Exhibit B

Reddit post instructing users to employ different names, email addresses, telephone numbers, and anonymous submissions to file multiple comments.



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Exhibit C

Reddit post admitting to filing two or three anonymous comments while pretending to be a different person each time.

