



U.S. Department of Justice
Drug Enforcement Administration

Office of the Administrator

Washington, D.C. 20537

AUG 17 1992

Mr. Carl E. Olsen
P.O. Box 4091
Des Moines, Iowa 50333

Dear Mr. Olsen:

This is in response to your letter of July 21, 1992, regarding my decision with respect to the Marijuana Rescheduling Petition.

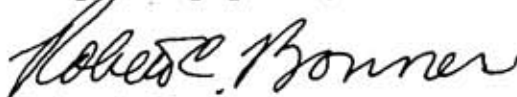
Your letter correctly states that one of the factors to be considered in determining whether a substance has a currently accepted medical use in treatment is that it is a scientifically established chemical compound capable of reproduction in standardized dosages. While you are also correct in noting that Congress placed coca and opium plant materials in Schedule II, your attempt to analogize those substances to marijuana, and to find inconsistency in their scheduling, fails.

In placing coca leaves and opium plant material in Schedule II, Congress was very much aware that these plant materials have historically been recognized as the source for a variety of accepted and useful medications. Neither of these plants are used medicinally as plant material. In both instances, the medically active alkaloids are extracted from the plant material after which pharmaceutical compounds capable of reproduction in standardized dosages are produced. These compounds are the medications which may then be lawfully marketed in the United States. While indigenous populations in various parts of the world brew coca teas, chew coca leaves, and smoke opium for various purposes, these practices are not permitted in the United States under the Controlled Substances Act.

Unlike pharmaceuticals derived from opium and coca leaves, the petition to reschedule marijuana did not involve the scheduling of any medically useful compound to be extracted from the plant material. Instead, the petition involved unsupported claims for the medical use of smoked marijuana. There is, therefore, no

inconsistency in my finding that such claims did not make a case for accepted medical use in treatment in the United States.

Very truly yours,

A handwritten signature in cursive script that reads "Robert C. Bonner". The signature is written in black ink and is positioned above the typed name.

Robert C. Bonner
Administrator of Drug Enforcement