



## Summary: DEA Docket No. 1156, Placement of DOI and DOC in Schedule I of the Controlled Substances Act

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2,5-Dimethoxy-4-iodoamphetamine (DOI) and 2,5-Dimethoxy-4-chloroamphetamine (DOC) are two essential research chemicals in pre-clinical psychiatry and neurobiology. DOI's use in the lab brought a new era of psychiatric drug discovery since it was used to map the localization of an important serotonin receptor in the brain critical in learning, memory and psychiatric disease. Over 80% of the antidepressant drugs on the market affect the serotonin system <sup>1</sup>.

**DOI and DOC's status as an unscheduled compound has made them *de facto* tools for researchers** studying serotonin receptors. DEA has proposed to place DOI and DOC in Schedule I of the Controlled Substances Act. Placement of DOI and DOC in Schedule I of the CSA is not commensurate with its abuse potential, and is further complicated by its extensive utility in scientific research. The low abuse potential of psychedelics combined with mounting preclinical and clinical research of their efficacy provides evidence against their placement in Schedule I <sup>2-4</sup>.

### Psychedelics Show Groundbreaking Therapeutic Potential

- There is a national epidemic of overdose deaths and mental health crises. Psychedelics, including DOI, numerous papers have demonstrated DOI efficacy in preclinical models of Major Depressive Disorder, PTSD, and addiction
- **DOI reduces fentanyl consumption and anxiety-like behaviors in animal models** <sup>5,6</sup>
- New Jersey S2283 would permit psilocybin use and production for therapeutic purposes
  - Clinical trials of various psychedelics are due to preclinical work with DOI and DOC
  - Breakthrough success of psychedelic clinical trials has led to increased use of DOI and DOC in preclinical models of psychiatric disease

### Schedule I Placement is Detrimental to Medical Research

- Schedule I licenses are costly, time consuming, and difficult to obtain <sup>7,8</sup>
- The serotonin 2A receptor is one of the most important receptors in the brain and regulates memory, learning, and psychiatric disease states
- DOI is the most widely utilized compound in preclinical psychedelic research
- **DOI and DOC have been used in more than 900 research articles**

### Forecasted Impacts on Research

- Significant reduction in the number of labs studying serotonin receptors due lack of access to tool compounds
- Reduced psychiatric drug development projects

### Law Enforcement Tools Available to the DEA for DOI and DOC Misuse Outside of the Lab

- *Federal Analog Act*. DOI and DOC are analogs of DOM and DOB, and DOJ can prosecute use outside the lab

### Danger to Self and Public Health

- Psychedelics are consistently ranked amongst the least harmful substances to self or the public <sup>10-12</sup>
- Lethal dose of psychedelics are typically 1,000x higher than the intoxicating dose <sup>13</sup>
- *Zero* fatal complications involving DOI and *three* from DOC over 20 years <sup>9</sup>



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