

V. J. M. L. S.

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## LEGAL ASPECTS OF MDMA

For information write to George Greer, M.D., 141 East Palace Ave., Apt 218, Santa Fe, New Mexico 87501  
Also, Alexander and Ann Shulgin, 1483 Shulgin Rd., Lafayette, Calif. 94549. Phone 415-934-4930.

The DEA has no jurisdiction as long as MDMA is not a controlled substance. But we must check whether by implication it is controlled. The FDA has jurisdiction if interstate transport of a drug is involved, according to Greer. Under CA law apparently the drug regulations do not prevent any licensed doctor from prescribing any drug, officially approved or not; and drug manufacturing regulations do not apply when a drug is manufactured by the person who prescribes it. Greer synthesized his MDMA in the laboratory of Shulgin and under his supervision. Apparently he also prescribed it in CA. There is a Board of Medical Quality Assurance in CA which requires that any Medical Research project include: 1. Reference to literature supporting safety and indicating possible usefulness. 2. Peer review. 3. Informed consent. No prior approval is necessary.

We have to look at the MA law on this.

Greer also followed guidelines of the N. Mexico Board of Medical Examiners for experimental medical practice, according to his published article. So apparently he did prescribe the drug in New Mexico. Did this involve interstate transport?

The information of Greer on CA law is based on a response by

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the attorney general of CA to questions from the State Board of Pharmacy on May 2, 1978. It is also based on the opinion of the legislative counsel of CA in answer to a question from a state senator in May, 1981. Similar information needed for MA.

We also need to talk to Justin WEiss about Human Studies approval.

Write to Shuigin.