Psychoactive Products of Concern Accessible to Minors in Colorado

1) **Cannabis Products**
    a. Regulated marijuana products (Delta 9-THC products)
        i. Sold as vapes, flower, edibles, concentrates
            1. Most concerning would be concentrates and high-THC vapes
    b. Hemp derived intoxicating cannabinoid products
        i. Sold as vapes, flower, edibles, concentrates
            1. Many of the newer cannabinoid products beyond just Delta 9-THC are believed to be much more potent/stronger than "regular marijuana" or Delta 9-THC, this includes substances like THC-O and HHC, which are commonly found in Colorado stores and from websites. These products come in the exact same form/types as regulated marijuana products but are not subject to the same regulatory/tracking/testing requirements.
            2. A common lab test performed by a hemp testing lab would include testing for the following cannabinoids, all of which are psychoactive and intoxicating. CDPHE regulations prohibit the direct sale to consumers in Colorado of all "Intoxicating Cannabinoids" derived from hemp, such as Delta 8-THC, THC-O and HHC. The following intoxicating hemp products can only be sold as "Safe-Harbor" products, outside the state of Colorado. Any type of THC must now be sold in regulated marijuana dispensaries and not unregulated retail stores, such as vape shops. However, these products can still be acquired through thousands of websites and in smoke/vape shops across Colorado who are not adhering to CDPHE regulations:
                a. Delta 9-THC
                b. Delta 9-THCA (just the precursor to Delta 9, so turns into regular Delta 9-THC when heated)
                c. Delta 8-THC
                d. Delta 10-THC
                e. Delta 9 THC-O
                f. Delta 8 THC-O
                g. HHC
                h. HHC-O

2) **<u>Natural Medicine Products/Natural Tryptamines</u>**
    a. The Natural Medicine Health Act decriminalized/legalized the following substances, specifically, but does not allow for any commercial sales of any of these:
        i. <u>Psylocibin/Psilocin (the two psychoactive components of "Magic Mushrooms")</u>
            1. You will find a lot of commercially branded products containing psylocibin/psilocin throughout Colorado, including some sold illegally at vape/head shops. These are sold as gummies and chocolate bars. These may not disclose those as an ingredient or may just be sold in violation of the NMHA, which prohibits commercial sales of the legalized substances of any kind. There are approximately 200 strains of mushrooms that are believed to contain psylocibin and these products are often marketed as to the specific effects of the strain used in the products, which may vary significantly as to both effects and potency.
            2. DOR/DORA are in the process of issuing licenses throughout Colorado to establish what are known as regulated "Healing Centers". These healing centers are limited to distributing psylocibin/psilocin, but are limited to the use of only one strain of mushrooms (Penis Envy) and limited in the type of products provided. Outside of Healing Centers, the law does not allow for the commercial sale/purchase of any of the legalized substances, including Magic Mushrooms. Outside of licensed "Healing Centers" these products can be gifted to other persons or as part of a ceremony performed outside the regulated market for which a person may provide renumeration to the provider for the services provided, creating what is essentially an unregulated market for spiritual or other ceremonial use by consumers.
            3. Many of the products that are available or accessible to minors and which are marketed as Magic Mushrooms often don't contain psylocibin or psylocin at all, but rather an analogue or substance that essentially mirrors those legalized substances.

These are known as “synthetic tryptamines” and are addressed in more detail below.

ii. Ibogaine
    1. Not commonly found in consumer products and is much less prevalent as a consumer-focused psychedelic. This substance also carries more specific risks in consumption than traditional psychedelics, such as Magic Mushrooms

iii. Dimethyltryptamine (DMT)
    1. DMT is a sertonergic hallucinogen and occurs naturally in various plants (ie cactus) or animals (toads). It is an analogue to Psolicin and therefore very similar in effects. It is one component of Ayahusasca.
    2. This substance is one which is found in vape products as well, and when vaporized and inhaled produces a very intensive psychedelic experience similar to a full psychedelic trip, but lasting only minutes instead of hours. This product would be found in the same vape hardware which might be used for Cannabis vape products, and on its face would look identical to a cannabis vape.

iv. Mescaline (excluding Peyote)
    1. Not commonly found in consumer products and is much less prevalent as a consumer-focused psychedelic.

v. Other unregulated Natural Tryptamines/substances of concern
    a. Amanita Muscaria mushrooms
        i. These mushrooms contain the following two psychoactive substances and are marketed and sold as similar to “Magic Mushrooms” in gummy and chocolate form. They are not regulated in the state of Colorado and often contain byproducts/other substances of concern.
            1. Muscimol
            2. Ibotenic Acid

3) **Synthetic Tryptamines/Research Chemical Products**
    a. This has been an emerging trend over the last two years, with more products entering the market daily. Many of these products don’t disclose their active ingredients on the packaging, as a way to avoid detection, regulation or law enforcement intervention.

b. Many of the brands of products which are marketed as “Magic Mushrooms” or “Nootropics” actually contain a variety of often unregulated and somewhat unknown psychoactive substances, alongside what are marketed as functional mushroom products, such as Lion’s Mane, Reishi, Turkey, or Oyster Mushrooms which are used for health/wellness purposes.
c. These Synthetic Tryptamines often mimic or produce similar effects to well known synthetic drugs such as MDMA and LSD, both of which are similarly synthesized in a laboratory environment using various chemicals
    i. Diamond Shruumz was an example of such product that caught the attention of the FDA/CDC and which was recalled and which is believed to have injured at least 180 people from 34 states, sending 73 to the hospital and causing 3 associated deaths
    ii. Neptune’s Fix was another product that has been described in the media as “Gas Station Heroin” and which contained both cannabis ingredients, as well as other unregulated psychoactive substances, such as Tianeptine, an unregulated Chinese anti-depressant which was contained in those products, but which was not disclosed as an ingredient.
d. After the Diamond Shruumz and Neptune’s Fix recalls, companies started producing similar products but using a host of new/unknown research chemicals, many of which aren’t regulated/illegal per se, but are analogues or derivatives of known Schedule 1 illicit substances. Many of these substances, generally referred to as “Synthetic Tryptamines” are used because they are so new/novel and not generally tested for by any labs or looked at by any regulatory agency. These are often marketed as analogous to a Schedule 1 Substance, or which mirror the effects of taking those substances, such as Psylocibin, Psilocin, MDMA, MDA, etc.
e. Example of current Synthetic Tryptamines used in products sold at vape/head shops in Colorado, or elsewhere:
        i. 4-acetoxy DMT (4-ACO-DMT) (this was contained in many Diamond Shruumz products and was widely used in these products when we first encountered them in 2024. It is not believed many products have moved to more undetectable substances now
        ii. 4 hydroxy DET
        iii. 4-acetoxy MET

a. We have confirmed the presence of this tryptamine in commercially branded and available products sold in retail locations in the state of Colorado

iv. 4-acetoxy DET
v. 4-acetoxy MIPT
vi. Methlycybin (4-HO-MET); we've confirmed this as present in current mushroom products being sold in Colorado and online; this is an analogue of Psylocin and is thought to act the same way when consumed)
vii. 4-propanoyloxy DMT
viii. DiPT (N, N-Diisopropyltrptamine)

4) **Kratom Products**

a. Kratom is an herbal substance that is found in a species of tree native to southeast Asia. In the United States, it is marketed and sold in consumable products that promote energy, well-being and pain relief or use as a substitute for opiates.
b. Until 2025, Kratom was essentially unregulated at the state level as to current products being sold on the market. Kratom is banned for human consumption within the city of Denver. In 2025, SB 25-072 was passed which will establish a regulatory system for the manufacture, distribution and sale of Kratom products, similar to other regulated intoxicating products sold in the state of Colorado, such as marijuana or intoxicating hemp products.
    i. SB 25-072 requires persons to be 21 years old to purchase these products and limits the amount of synthesized or semi-synthesized kratom alkaloids that can be contained in these products to 2% of the total alkaloid content of the products
c. Kratom is found in two primary forms in consumer products:
    i. Whole Leaf Kratom
        1. Generally sold in packages containing the raw powder or capsules/edibles containing raw kratom. These products are in a natural form and contain only trace amounts (approx. 2%) of kratom alkaloids, such as Mitragynine.
    ii. Synthesized/Semi-Synthesized Kratom Products
        1. These products are manufactured using other toxic and harmful chemicals (such as pool cleaning chemicals) and are extracted in much more concentrated or potent amounts than

naturally occur in the plant, making these products much stronger than they naturally occur.

2. These are the specific types of Kratom products which research shows to be very addictive, even compared to prescription opioids. However, these products are marketed as a substitute or less harmful alternative than opioids. Under SB 25-072, the new law caps the amount of these substances that can be contained in any consumable product to 2% of the active alkaloids, such as the following:
    a. Mitragynine
        i. Occurs naturally in plant around 2%
    b. 7-OH-Mitragynine (often called "7")
        i. Occurs naturally in the plant around .01-.02%
            1. This product is the most prevalent in retail/online and is the most concerning, as it is believed to be much more potent than morphine and highly-addictive.
            2. This is sold in capsules, pills, drinks/shots, gummies and various other edible products. We've recently seen advertisements for this being placed into vapes and other non-ingestible forms.
            3. FDA has issued a number of warnings on kratom products
            4. The following Reddit threads will allow you to see consumers discussing how addicting/harmful these products are: