

DOCUMENT RECONSTRUCTION — NOT THE ORIGINAL FILING. NORML's June 19, 2026 emergency request for reconsideration was not published as a downloadable document. The text below reconstructs the letter's structure and substance from NORML's own public statements and contemporaneous reporting (*Marijuana Moment*, *Cannabis Business Times*, *Ropes & Gray*). Bracketed quotations are attributed excerpts; surrounding text is a faithful paraphrase, not verbatim filing language. Verify against the official record before any legal use.

National Organization for the Reform of Marijuana Laws (NORML)

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June 19, 2026

Terrance C. Cole, Administrator

Drug Enforcement Administration

8701 Morrisette Drive, Springfield, VA 22152

Re: Emergency Request for Reconsideration of the Denial of NORML's Notice of Intention to Participate — *In the Matter of Schedules of Controlled Substances: Proposed Rescheduling of Marijuana*, Docket No. DEA-1362 (Notice of Hearing, 91 FR 22777). In the alternative, request for referral to the presiding officer and certification for interlocutory appeal.

Dear Administrator Cole:

Introduction

NORML respectfully submits this emergency request for reconsideration of the Administrator's decision excluding NORML from the list of interested persons selected to participate in the above-captioned hearing, scheduled to commence June 29, 2026. NORML has represented the interests of adult cannabis consumers for more than fifty years and seeks formal participant status so that the consumer and patient perspective is reflected in the administrative record.

As NORML's counsel has stated publicly, the "[p]ublic interest will be substantially harmed if the record omits the consumer perspective."

The denial rests on a mischaracterization of NORML's position

The denial treats NORML as a party that merely supports the proposed rule and therefore cannot be "adversely affected or aggrieved" by it. That is a mistaken premise. NORML does support removing marijuana from Schedule I, and it recognizes that Schedule III is preferable to Schedule I. But NORML does not concede that Schedule III is the correct final federal treatment of marijuana. Its considered position is that marijuana should be removed from the CSA schedules altogether and regulated under a cannabis-specific federal framework directed to public health, consumer safety, product integrity, youth prevention, truthful labeling, testing, research access, impaired-driving policy, anti-diversion measures, the realities of state-regulated markets, and displacement of the illicit market.

Because NORML and the consumers it represents would remain subject to continued federal control and its consequences under a Schedule III outcome, NORML is in fact adversely affected or aggrieved

by the proposed rule within the meaning of the governing regulation, and qualifies as an interested person entitled to participate.

Exclusion causes procedural prejudice and an incomplete record

Every selected participant opposes rescheduling. Excluding the nation’s leading cannabis-consumer advocacy organization would, in NORML’s words, cause “immediate and irreparable procedural prejudice” and impair the completeness and balance of the administrative record on a matter of substantial national importance.

A record developed solely from witnesses opposed to the reform risks being materially one-sided at the very moment when federal marijuana policy requires clarity, balance, and restraint, and may leave the agency without an adequate record to defend any Schedule III determination on judicial review.

Relief requested

NORML respectfully requests that the Administrator:

1. Reconsider and vacate the denial of NORML’s notice of intention to participate, and admit NORML as an interested person and designated participant in the hearing;
2. In the alternative, refer this request to the presiding Administrative Law Judge and certify the question for interlocutory appeal so that NORML’s participation can be resolved before the evidentiary record closes; and
3. Grant such other relief as is necessary to ensure a full, fair, and balanced proceeding concerning the federal legal status of marijuana.

Given that the hearing is set to begin June 29, 2026, NORML requests expedited consideration of this emergency request.

Respectfully submitted,

Joseph A. Bondy

Chair, NORML Board of Directors, and Counsel to NORML

Sources underlying this reconstruction

NORML, “DEA Limits Participants in Upcoming Marijuana Hearing to Those Opposed to Rescheduling” (June 19, 2026); Marijuana Moment, “NORML Asks DEA To Reconsider Its Request To Participate” (June 2026); Cannabis Business Times, “DEA Judge Sets Cannabis Hearing Schedule” (June 24, 2026); Ropes & Gray, “Clearing the Haze?” (June 2026); DEA Notice of Hearing, 91 FR 22777, Docket DEA-1362.