

North Dakota Cited 50 Kratom-Associated Deaths. Its Own Records Narrow That to 2 Suspected Mitragynine-Only Cases.

And the state has not shown that either involved natural kratom leaf.

To support a statewide ban on natural kratom leaf, the North Dakota Department of Health and Human Services (DHHS) pointed to **50 deaths** "associated with" kratom, mitragynine, concentrated 7-OH, and/or pseudoindoxyl, and publicly emphasized **24** where one of those substances was listed as a primary or contributing cause. But the records obtained from the state narrow that number dramatically — down to just **two** confirmed cases involving mitragynine alone, neither shown to involve natural kratom leaf.

THE CHAIN OF EVIDENCE

DEATHS CITED · 2019-2025



50 associated deaths

↓ 26 excluded from causation; detected in toxicology only

24 listed as a primary or contributing cause

↓ However, 20 involved illegal drugs, other substances, suicide, or other circumstances

4 without other drugs

↓ 1 combined-substance case + 1 not laboratory-confirmed

2 mitragynine-only

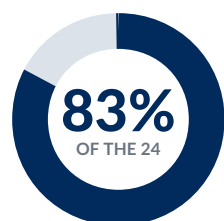
0 shown to involve natural leaf

Of the 4 deaths with no other drugs involved: **2** suspected mitragynine-only, **1** mitragynine + synthetic 7-OH + pseudoindoxyl, and **1** presumed synthetic 7-OH that was not laboratory confirmed.

DHHS's private toxicology lab only began testing for concentrated synthetic 7-OH and other synthetics in **September 2025**. The state explicitly says "deaths before that time may not have been evaluated for 7-OH."

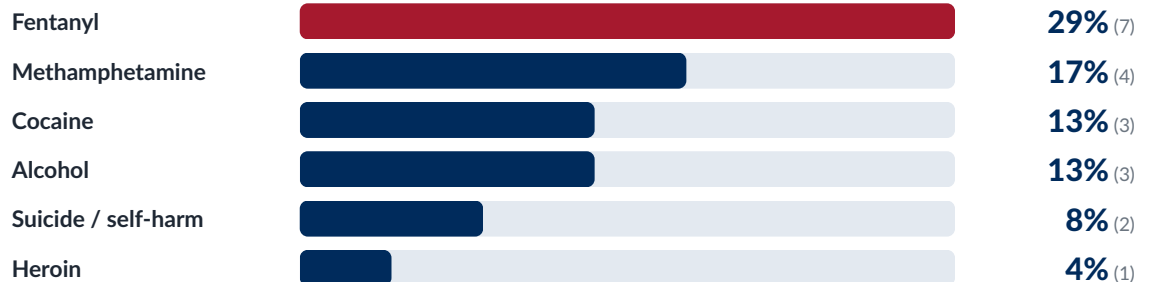
83% OF THE 24 WERE NOT KRATOM-ONLY DEATHS

19 involved other drugs. One was a self-inflicted gunshot death in which mitragynine was only a contributing factor.



involved other drugs
or circumstances

ALSO INVOLVED — SHARE OF THE 24:



Other cases involved bromazolam, trazodone, bupropion, cyclobenzaprine, gabapentin, pregabalin, promethazine, and diphenhydramine. (Percentages overlap; many deaths involved more than one substance.)

THE EVIDENTIARY GAP: DHHS began with 50 "associated" deaths. More than half were toxicology detections only. Of the 24 remaining, 20 involved other drugs or circumstances. Only two were confirmed mitragynine-only cases. The state has produced no evidence showing that either involved natural kratom leaf.

A statewide ban on natural kratom should not be justified by product attribution DHHS has never established.