

## Narconon, Scientology, and the Battle for Legitimacy

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### Abstract

This article provides an historical description and analysis of Scientology's controversial drug treatment program, Narconon. Following scholarship by sociologist Terra Manca on Scientology's pseudo-medicine, I argue that Scientology initially wavered about acknowledging its program to be part of its 'religion,' but eventually dropped this claim as it attempted to get Narconon programs and teachings established in communities. I show, however, the intimate association between Scientology and Narconon courses, and present some of the evidence that the program lacks scientific validity - especially its Purification Rundown.

### I. INTRODUCTION

Developed by Scientology and overseen by one of its front groups called the Association for Better Living and Education (ABLE),<sup>1</sup> Narconon represents itself as a drug treatment program that "has been saving lives since 1966."<sup>2</sup> Its treatment involves regimes of running, vitamin consumption, saunas, and courses borrowed almost directly from Scientology, based upon the instructions of Scientology's founder, L. Ron Hubbard (1911-1986). According to a 2017 Narconon Worldwide website that listed its "drug and alcohol rehabilitation centers," thirty-one programs operated globally, scattered throughout the United States, Latin America, Europe, Russia, the Ukraine, Turkey, Nepal, and Australia.<sup>3</sup> The website listed eight of those programs as operating in America, and in November 2016, the online Behavioral Health Treatment Services Locator for the Substance Abuse and Mental Health Services Administration (SAMHSA) within the United States Department of Health and Human Services provided contact information for two Narconon programs. To family members looking for programs that will help free loved ones from drug addictions, their inclusion within a federal database likely appears as a government endorsement of the general Narconon program.<sup>4</sup> If these family members opened the Narconon website, then they would find a ringing endorsement of the program from prominent Scientologist and star of television and movies, Kirstie Alley (b. 1951): "Narconon has a program that works. I know. I did it. It saved my life."<sup>5</sup>

At the same time, however, as the names of Narconon programs appeared on the locational database and Alley and other Scientology celebrities endorsed them, Narconon centers and staff across the United States were under siege by plaintiffs alleging a wide range of fraudulent and professionally improper (and in a few cases, deadly) behaviors. Many of these behaviors have haunted Narconon since its initial introduction into communities in the early 1970s. This article, therefore, will examine the origins and some of the early criticisms of Narconon, many of which have continued to appear since that period. The article also discusses the impact on Narconon of Hubbard's creation (by the early 1980s) of the program called the Purification Rundown, which introduced a series of medically-based dimensions to the program's claims to purge the body of drug and radiation residues. Yet even before societal opposition arose to the program (initially fueled by the media and now stoked by the Internet), Scientology introduced supportive claims for the program from both celebrities and a few medical practitioners. Thus, a detailed discussion and analysis of Narconon's history and controversial programs provides the backdrop for the examples of celebrity involvement, which takes place well into this article. Fittingly, therefore, I conclude with a brief mention of some of the current Narconon litigation battles.

Data for this study comes from the Stephen A. Kent Collection on Alternative Religions, housed with the University of Alberta Library system and which I began some thirty years ago. Confidential material in it necessitates that it remains closed to the public until 2070, but I and my graduate students use it on a regular basis. Specifically related to Narconon, the collection contains approximately six feet (1.83 meters) of around 350 files donated over the years by at least nine people in three countries, plus non-confidential material that I have acquired through involvement as an expert witness in six American court cases against Narconon. Many of the donors had been in Scientology and retained documents after they departed the organization. In turn, some of these donors themselves had gathered materials from others, so the combined number of donors remains unknown.

The files holding the wide range of primary and secondary documents, legal materials, media reports, Narconon and Scientology internal documents and courses, etc. are arranged (or serialized<sup>6</sup>) in at least nine categories, each reflecting either the nature of the documents (for example, advertisements, reports, celebrity endorsements, etc.) or their geographical origin by country and region (for example, materials about specific Narconon organizations, media accounts, and legal documents). In building the archive itself as well as in selecting materials for

this article, I made every attempt to be comprehensive about the program and its critics, knowing full well that much of the material reflects a social constructionist battle<sup>7</sup> over its effectiveness and legitimacy. Because so many of the documents are authentic (being originals or photocopies of originals<sup>8</sup>) from fifty years of Narconon's operation, longitudinal triangulation of the article's basic ideas occur, since Narconon doctrines and practices share broad consistency over time. I realize, however, that no archival collection is complete,<sup>9</sup> but this one may be the most extensive one on Narconon (outside of Scientology's own collection) in the world. I cite some information from websites that are either official creations of Narconon or Scientology, or are hosted and run by reliable critics.

This article aligns itself with most of the theoretical insights about Narconon as pseudo-science, developed by sociologist Terra Manca.<sup>10</sup> She discussed Scientology's alternative therapies within the "social worlds" context of medical science, religion, and alternative medicine. Each of the social worlds has its own "universe of discourse," and through each universe, "common symbols, organizations, and activities emerge."<sup>11</sup> Moreover, each one also is composed of numerous social sub-worlds, which are "clusters of organizations" that share basic interests with a social world and often have some overlap into more than one. Manca's basic argument was that Scientology's sub-social world of marginal medical practices "find shelter from the regulatory forces of the [social world] of medicine by affiliation with the [social world] of religion."<sup>12</sup>

Concerning many of Scientology's pseudo-or marginal medical practices, Manca's conclusion seems accurate, and some years ago I made a similar argument about Hubbard's early transformation of Scientology from a reputed science into a religion.<sup>13</sup> I certainly share her sentiments about Scientology's and Narconon's "radiation-curing claims out of concern that those who turn to Scientology about radiation, its effects, and proper responses to it could suffer significant health and/or financial consequences."<sup>14</sup> This article's close analysis of Narconon however, shows that Scientology was not able continue Narconon's veneer as a religion while marketing it as a scientifically validated drug treatment program available to the non-Scientology public. Scientology's founder himself puzzled about how to resolve this dilemma, and finally settled on the rather unsatisfactory solution of claiming that the Narconon program was completely secular in nature, despite the fact that its texts reproduced sections of Hubbard's writings that have religious status among Scientology's followers. Moreover, Scientologists claiming that Narconon's pseudo-science actually had secular scientific verification opened its

treatments to critical scrutiny by medical researchers and others who did not accept Hubbard's writings as "unchanging truth."<sup>15</sup>

## II. ORIGINS OF NARCONON

All accounts that discuss the origins of Narconon attribute its creation to William Benitez (b. 1934 in Tucson, Arizona; d. 1999) who was serving time in the Arizona State Prison as a habitual criminal. Attempting to find assistance in conquering his drug problems, Benitez discovered an L. Ron Hubbard booklet, which he called *Fundamentals of Thought*, and Benitez's reaction to it was:

'Wow.' This man has said more in this one booklet than all the Authorities have said in all the texts that I've read.' Nothing was written about drugs or law . . . yet, I then knew that I was on my way to freedom from drugs and freedom from prison. Incidentally, after I established Narconon I found that my sentence was illegal and the courts released me.<sup>16</sup>

Benitez expanded his reading of Hubbard to include *The Problems of Work* and *The Science of Survival*, and on February 18, 1966 he began discussing Hubbard's ideas with a group of twenty addicted inmates.<sup>17</sup> Interest grew sufficiently to create a second group,<sup>18</sup> and Benitez made contact with Scientologists in Phoenix, Arizona, after which the Scientology organization quickly took charge of the program's operation and expansion. "In or about 1971," the Assistant Guardian for Public Relations in the United States (Arthur Maren), approached Scientologist Mark Jones about "set[ting] up a Narconon office and establish[ing] programs under the direction of the Guardian Office." Jones "agreed to do this and undertook to make Scientology an international drug rehabilitation agency on behalf of Scientology."<sup>19</sup> Part of the Guardian [sometimes called Guardians] Office strategy apparently was to have "letters written and booklets sent to all Governors, key members of Congress, Directors of Corrections of the various States, Wardens and Superintendents of institutions."<sup>20</sup>

The promotional campaign seemed to have had some effect. For example, Hawaii Governor John A. Burns (1909-1975) wrote to his California counterpart, Governor Ronald Reagan (1911-2004), introducing Reverend John W. Elliot of the Church of Scientology of Hawaii. Elliot and Benitez lobbied the state's correctional division about implementing a

Narconon program, and Burns believed that California “might very well find it valuable.” Elliot was about to visit California, and Burns suggested to Reagan that he make time to meet the Scientologist and discuss the program.<sup>21</sup> Available records do not indicate whether such a meeting took place between Reagan and Elliot, but in 1970 Scientology Reverend Robert Vaughn Young (1938-2003) began a Narconon program at the California Medical Facility at Vacaville.<sup>22</sup> In Boston, Narconon programs ran in the Naval Correction Division of the Boston Navy Yard and the Long Island State Hospital for Alcoholics.<sup>23</sup> When Narconon officials attempted to determine recidivism rates, they claimed that 60% of graduates remained off drugs.<sup>24</sup>

Media from various parts of North America, and even parts of Europe, indicated some support for the program. For example, newspaper reports from Delaware were praiseworthy. In Wilmington’s *Morning News*, reporter Bill Frank indicated that a Narconon program had begun in the Delaware Correctional Center around May 1972, and by April 1973 “Narconon is regarded by officials of the State Drug Abuse Division as one of the best anti-drug abuse programs in the state.”<sup>25</sup> Currently, the “Home” section of Narconon International’s website reproduces endorsement letters and positive media articles from Ontario and British Columbia (Canada), Los Angeles, Arizona, Boston, Phoenix, Delaware, Hawaii, Mexico, and other locations.<sup>26</sup> One of the newspaper articles that the website reproduced was a piece that John Schwartz of the *Arizona Republic* printed in December 1972, which contained the statement by Narconon’s national supervisor that the program was “receiving at least a 70 percent rate of success.”<sup>27</sup> Another item on the website - a February 1973 letter published by Dr. Frank Gerbode, who was a psychiatrist in Palo Alto, California - represented the program’s success rate (i.e., the number of participants who did not recidivize) even more favorably, at 85%.<sup>28</sup>

Gerbode was one of the driving forces behind Narconon’s establishment of a community rehabilitation program in Palo Alto, California, which ran from 1975 until early 1977. An annual performance evaluation in January 1977 was highly critical of the program, and recommended to the city that it not renew the contract. Subsequently, the city followed this recommendation.<sup>29</sup> Worth examining are the reported problems with and around the program, since many of them reappear in various forms for decades in debates about Narconon in other locations. The evaluation listed the problems individually, and concluded, “[O]n balance, the performance of [Narconon Palo Alto (henceforth, NPA)] characterizes a level of service and effectiveness which is acceptable neither in relationship to the scope of services incorporated in the City contract nor

in light of the needs and services existing in the community.”<sup>30</sup> With the grace of hindsight, I can organize the identified problems into two related categories: Narconon’s relationship with Scientology and Narconon staff’s frequent unprofessional conduct.

### III. EARLY ISSUES IN PALO ALTO: QUESTIONS ABOUT NARCONON AND SCIENTOLOGY

The Palo Alto report specifically raised “the question of linkages to the Church of Scientology,” but not because any association would have been a concern for the evaluators *per se*.<sup>31</sup> The City itself was concerned only with the practical impact of the program, and did not see how the issue of possible Narconon/Scientology linkages might have influenced the program’s effectiveness. I argue below that in fact the linkage probably caused many of Narconon’s problems. According to the report, what mattered was that many people in the community believed that a link existed, and that belief “may have acted as a barrier to NPA’s ability to reach potential clients.”<sup>32</sup> Likewise, “other anti-drug abuse professionals” likely refused to send clients to Narconon because they, too, “were concerned about the relationship between NPA and the Church of Scientology. Whether or not this concern was justified, the issue itself served as a barrier to the effectiveness of NPA in providing anti-drug abuse services.”<sup>33</sup> During, however, “the first evaluation review meeting, the representative of the Church of Scientology stated the observation that the press had been largely responsible for creating the issue of the alleged link between NPA and the Church of Scientology. She emphasized that this was not a valid issue.”<sup>34</sup>

Two areas of the evaluation discussed aspects of Narconon’s operation that revealed its close association with Scientology, but the report’s authors failed to make the association for their readers. One area involved a discussion “of the cost of the complete series of courses[, which] is probably prohibitive to the majority of the target population.”<sup>35</sup> The evaluation then listed the courses, giving their names but not identifying their origins. The first was with the communications course. After its completion, NPA staff encouraged clients to take additional courses. Those courses included a “study course,” followed by a longer “drug run-down process” and vitamins.<sup>36</sup> Overall costs could come to \$4,495.00.<sup>37</sup> I will discuss Narconon’s courses below.

A second area of the evaluation upon which the reviewers reported without any analysis was the case of the Narconon program kicking out someone who was “being treated for prescribed medication.”<sup>38</sup> A review of the client’s intake forms indicated that the client “was

being medically treated for chronic schizophrenia,” which suggests that Narconon officials wanted to treat the psychiatric condition but only after the client went off his or her prescriptions. An example from this era of Scientology using a Narconon facility to treat a schizophrenic whom staff had convinced to stop medications took place in southern Ontario in 1976.<sup>39</sup> This person was “routed-off”, reflecting an NPA policy to drop a person from the program when he/she persistently caused trouble or disrupted the NPA course. NPA also noted that the client was a ‘Type III’, a term used by NPA to describe “an individual so completely overwhelmed by the past as to have lost contact with the present (‘psychotic’).”<sup>40</sup> Here we have an example of what Manca would say was Scientology’s and Narconon’s “opposition to orthodox medicine,” which was a “cultic element” that contributed to its designation as being “marginal medicine.”<sup>41</sup> This wholesale condemnation of pharmaceuticals remains a central characteristic of the Narconon program, and is a major reason why orthodox medicine rejects it.

#### IV. AN ADDITIONAL EARLY ISSUE IN PALO ALTO: NARCONON’S APPARENT UNPROFESSIONALISM

An additional category of problems that the Social and Community Services Administration identified in its 1977 evaluation of Narconon was what I call an endemic lack of professionalism within and around the Narconon program. As an organization receiving public funds for the treatment of what can turn into life-threatening habits and behaviors, Narconon had multiple responsibilities to the public community, the community of other associations working on drug addiction problems, the clients who entered the program, and the staff who worked with them. One way that Narconon failed the public community was that, after an unsuccessful attempt, “NPA [officials] did not provide [an]other substantial opportunity for community input into the organization’s policy-making process. This direction from [Palo Alto] Council represented a different way of doing business for the NPA and was difficult for them.”<sup>42</sup> Two community groups that suffered because of this poor outreach were women and youth.<sup>43</sup> These shortcomings regarding public outreach were among the reasons why “NPA [did] not have the trust and support of some relevant portions of the community.”<sup>44</sup> Narconon only harmed its community relations image further by not giving any input into an inter-group agency that was planning the next year’s drug-related services.<sup>45</sup>

Narconon had poor relationships with other organizations working on drug abuse issues. It seemed not to have worked professionally with any other agency, and one or more of the

agencies themselves refused to send clients to the program.<sup>46</sup> Narconon refused to involve itself in “hospital detoxification,” which probably involved the use of medically supervised drugs to help with various dimensions of addiction and/or withdrawal.<sup>47</sup> The interactions between Narconon representatives and professionals from the Palo Alto Unified School District were so bad that the education representatives “had serious doubts about the competence of NPA.”<sup>48</sup> Narconon even had difficulties interacting with the City of Palo Alto - the body from which it received money - by “not provid[ing] access to client files during the evaluation study as required by the contract.”<sup>49</sup> Almost all of the information that NPA distributed was its own - little if anything came from the other agencies about their respective programs.<sup>50</sup>

Narconon’s relationship with the clients who entered the program was problematic if not unprofessional in a number of ways. A basic issue was “that NPA provide[d] a single, standardized course of treatment. Because of this [singular approach], NPA may have [had] a more limited appeal for drug abusers and addicts, as compared to more eclectic drug abuse agencies.”<sup>51</sup> Problems with the content of the program also likely existed, since “43% of those entering the treatment program left before completing the basic course.”<sup>52</sup> The courses were expensive,<sup>53</sup> and the refund procedure was “complicated.”<sup>54</sup>

The program’s relationship with the staff also involved issues that reflected upon Narconon’s lack of professionalism. Narconon’s staffing involved the promotion of clients to staff roles if directors felt sufficiently impressed with their progress. “In one case, a client who was reportedly a heavy cocaine user became a supervising counselor after less than three months in the program.”<sup>55</sup> Narconon was supposed to conduct training for its staff in “different counseling skills and provide up-to-date accurate information on drugs, their effects, and the causes and results of drug abuse,” but no evidence existed that it taught anything to its staff outside of its own singular approach to drug issues.<sup>56</sup>

In sum, the issue of Narconon’s possible relationship to Scientology played a small role in 1977 review of the Narconon Palo Alto program by a branch or the City Council, but it seems likely from the content of that report that the authors knew little about Scientology practices, policies, and language. If they had known more, then they would have seen the overwhelming influence on Narconon that Scientology had, and they also would have recognized that many of the program’s problems and unprofessional aspects came from that influence.

## V. ISSUES RELATED TO THE EARLY NARCONON PROGRAMS

In late 1975, the Council of Palo Alto began debating the merits of introducing Narconon as a city-sponsored program, and the two groups began working toward that end in early 1976. In June 1976, a mother who was disgruntled over how Narconon supposedly was pressuring her to enroll her son in additional courses that he did not like, caused tensions between the two groups,<sup>57</sup> but a more persistent problem had emerged some months earlier, in April. Canadian ex-Scientologist Brendon Moore began sending materials to Palo Alto officials that purported to show that the Scientology link to Narconon was intimate, the latter serving as a recruitment and dissemination vehicle for the former.<sup>58</sup> Both Scientology and Narconon denied the authenticity or legitimacy of the documents that Moore provided,<sup>59</sup> so a somewhat perplexed city council decided not to pursue the Scientology/Narconon relationship. Instead, council members agreed simply to place its emphasis “upon monitoring [Narconon Palo Alto’s] performance in treating persons with severe drug abuse problems.”<sup>60</sup> Narconon, in turn, convinced a judge to issue a court injunction against Moore and his associate, Lorna Levett:

ordering them to cease their harassment and interference with the internationally recognized drug rehabilitation program, Narconon. Judge George H. Barnett’s action further prohibit[ed] Levett, a Calgary [Alberta] self-identified psychic and Moore, her assistant, from stating to any party that Narconon is controlled by the Church of Scientology or affiliated in any manner with a religious organization.<sup>61</sup>

Ironically, we see in retrospect that Moore and Levett’s statements connecting Narconon with Scientology essentially were accurate. However, in the case of Palo Alto’s struggles with Narconon, Narconon officials thought they increased chances of legitimation by *denying* its Scientology connection. This strategy, therefore, attempted to remove Narconon from the social worlds of either alternative medicine or religion and place it in the social world of medical science, but the result was disastrous for Narconon’s legitimation efforts.

One among several reasons why the city government cancelled the program was because it treated so few people—only seven clients between February and late November, 1976, when the city would have been willing to pay for up to ninety-two treatments.<sup>62</sup> Various explanations for this low treatment rate may exist, but among them has to be the fact that the Narconon program used Scientology material that was not intended or designed for drug treatment. In addition to Narconon’s content problems related to its Scientology origins, Narconon had not

established working relationships with important community agencies operating in the anti-abuse field.<sup>63</sup> Equally critically, Narconon had not expanded its board of directors to represent the community. Narconon Director Nate Jessop said in a letter to the staff that the Narconon national office would not allow any expansion of the board beyond five members because of concerns that a majority of members would not be familiar with Narconon ‘technical procedures,’ which consist of courses based on ideas of L. Ron Hubbard, founder of the Church of Scientology.<sup>64</sup>

In sum, within a decade of its creation, the Narconon program based solely upon Scientology’s courses ostensibly designed to improve communication had encountered problems that would recur in programs around the world. These problems included a former client and family disgruntled over the contents and relevance of the courses, low treatment rates, unverified recidivism rates, and poor (if not nonexistent) connections with other community agencies.

In addition to problems encountered in Palo Alto, California, Narconon lost contracts in Michigan and Minnesota. In Michigan:

the State Department of Corrections canceled a \$35,000 contract with NARCONON, a group that was doing drug abuse work with prisoners. State officials, calling the group’s program a ‘con,’ said it was really a recruiting effort for Scientology and had dubious success rates.<sup>65</sup>

State officials canceled the contract after the *Detroit News* reported on the Scientology connections.

Since 1977, the Michigan Department of Corrections had paid over \$100,000 into the Narconon program.<sup>66</sup> In that same year, the United States government raided Scientology offices in Washington, D.C. and Los Angeles, and learned from confiscated documents that the Guardian Office, which ran Narconon, had coordinated a massive spy operation against the Internal Revenue Service and other government agencies. Eleven Guardian Office members received federal convictions for their involvement.<sup>67</sup>

In the same period, the press in Minneapolis received information from Canadian ex-Scientologist Lorna Levett about Narconon, presumably similar if not identical to what she and/or Brendan Moore had sent to officials and the media in Palo Alto area. At the same time, staff in Minnesota’s St. Cloud Reformatory for Men acted on additional information they had obtained about a Narconon/Scientology link and raided Narconon’s offices in 1981. They found

what they considered to be definitive material linking the two organizations, and as a result they closed down the program within weeks.<sup>68</sup>

## VI. NARCONON AND SCIENTOLOGY

A brief history of Narconon's initial days shows that the Scientology organization took control over the developing drug treatment program fairly quickly during or before the early 1970s. Nevertheless, persons launching lawsuits and public critics of Narconon seemingly did not know this initial history, so lawsuits frequently try to establish, what, if any, connections exist between the two organizations. As I now will show, the connections between Narconon and Scientology grew even tighter as time progressed.

During the early years of Narconon's operations, and while Scientology was gaining control over the program, Hubbard clarified his position about what appropriate ethics were for Scientology members and the organizations they ran. In June 1968, Hubbard published one of several definitions of Scientology ethics, which made the elimination of counter-Scientology programs and positions an imperative for members, at the same time requiring them to eliminate all programs that were indifferent to or not involved with spreading his influence. In a policy letter, the definition of "ethics" read, "the purpose of ethics is to remove 'counter intentions' from the environment. And having accomplished that the purpose becomes to remove 'other intentionedness' from the environment."<sup>69</sup> In Hubbard's often 'creative' use of language, 'counter intention' would have included Narconon's opponents, and 'other-intentionedness' would have included drug treatment programs that used methods different from Narconon's. Monitoring agencies, and efforts to bring non-Scientology community members into positions of control over Narconon, ran the risk of placing 'other-intended' or even 'counter-intended' people in positions where they could attempt to alter Narconon's delivery of the Scientology technology. No wonder Narconon had such trouble working with outside groups and officials. Also no wonder that Narconon promoted into staff positions former clients who successfully completed the Scientology-based program. They likely had no administrative skills, but they were "intentioned" toward Narconon, and hence toward Scientology itself.

In the next year (1969), Scientology's leadership launched a radically new directive concerning the purpose of the organization. Prior to the memo, Scientology's purpose always was to "clear Earth" - a vague phrase that seemed to mean removing the blockages within people

that prevented them from realizing their full potential and eliminating in society any and all opposition to Scientology and its techniques. That opposition, Hubbard concluded, came from the psychiatric and mental health professions, so those professions became the scapegoats to explain Scientology's only modest successes. An unsigned memo - but certainly written by Hubbard himself - to the Guardian Office proclaimed, "Our work has been forced to become 'Take over absolutely the field of mental healing on this planet in all forms.'"<sup>70</sup> Hubbard, presumably, had declared war against psychiatry and other mental health professions,<sup>71</sup> and against the pharmaceutical tools that they prescribed.<sup>72</sup> Henceforth, Hubbard used Narconon as a weapon against psychiatry, which manifested itself in such behaviors as Narconon staff avoiding hospital-based drug rehabilitation programs under the assumption that psychiatrists using medications might be involved. As Manca observed, "Scientology regards Hubbard's work as the unchanging truth, and therefore, rejects any influence outside of its own literature."<sup>73</sup>

In contrast to psychiatry, whose doctors may have used medication to assist in stages of drug treatment, Hubbard's Scientology in the late 1960s and early 1970s used vitamins and elaborate talking cures and visualizations. For example, the first Narconon course, which took place in 1966 and which Benetiz ran in the Arizona State Penitentiary "consisted only of the basic communication exercises" within Scientology.<sup>74</sup> These exercises involved such activities as issuing and receiving commands, maintaining strict attention over an extended period, and using one's surroundings to stay located in present time.

On another issue that had bearing on Scientology's relationship to Narconon, Benetiz misnamed the book that inspired him to initiate what became the Narconon program. Benetiz called it *Fundamentals of Thought*, and some subsequent Narconon programs continued to use that name, as apparently did many Scientologists, but as shorthand for the complete title: *Scientology: The Fundamentals of Thought*.<sup>75</sup> Identification of the complete title would have made it more difficult for future Narconon advocates to deny a basic Scientology link.

By 1971, after Scientology took on Narconon as one of its own programs, its content had expanded to include numerous Scientology courses and exercises. Excerpts from a Narconon publication from that year outlined the contents of five Scientology courses and ten training routines, each of which was supposed to improve aspects of communication. Because, as Scientology courses and routines, none of them contained specific material about beating drug addiction, Scientologists tried to make them relevant in the Narconon context. For example, Course III on Objective Exercises was supposed to help drug addicts go "cold turkey" if an

addict did the exercises alternately with drills from Course IV – Communication and Control Course.<sup>76</sup> According to a February 1972 letter from Narconon’s Dissemination Secretary, “Narconon is using basic, lower level Scientology tech to produce unheard of results in rehabilitation.”<sup>77</sup> Even Narconon’s founder, however, realized that the Hubbard text that had inspired him had nothing directly about drug rehabilitation in it, but the courses and exercises Scientology quickly added to the program were no more relevant. The best that Scientologists could do was add the occasional phrase that stated how the courses and exercises related to drug rehabilitation, but often the alleged connections seemed remote.

In the early 1970s, prominent Scientologists watched the program receive praise in various parts of the United States. Hubbard himself was delighted, as he revealed in a late August 1972 letter simply entitled “NARCONON”:

The incomparable Guardians Office has begun running the Narconon (Drugs –no!) Program over the fields [i.e., in different areas of society].

The program is now fully subscribed - state paid - in one country and one state and contributed to by governments in several other locales.<sup>78</sup>

Further on Hubbard concluded: “Narconon is the ONLY successful drug rehabilitation program on the planet. It is being recognized as such.”<sup>79</sup> Roughly two years later, the front page of the newsletter, *Narconon News*, had an illustration of one bridge (labeled “Narconon Enter Here”) connected to another bridge (entitled “The Way to Total Freedom”). Scientology often described itself as “the bridge to total freedom,” and the text beneath the illustration read, “NARCONON is freeing people from crime and drug abuse with standard tech, and starting them up RON’S bridge to total freedom. . . . NARCONON IS THE BRIDGE TO THE BRIDGE.”<sup>80</sup>

More recently, an advertising pamphlet published by the Church of Scientology Western United States in 2002 identifies “Top FSMs [Field Staff Members].” In the category called “Groups,” the third group FSM was Narconon Newport Beach.<sup>81</sup> Scientology’s *Modern Management Technology Defined* states in its third definition of a Field Staff Member that “**3. FSMs** get people into Scn [Scientology] by disseminating to bring about an understanding of what Scn can do thus creating a desire for service, and selecting the person for that service.”<sup>82</sup> In other words, Narconon Newport Beach was recruiting people into Scientology.

Most recently, evidence from a program called Narconon Fresh Start in Nevada indicates that this recruitment function from Narconon into Scientology still occurs. I have a picture of a

plaque, for example, that hung on the wall of the Fresh Start program somewhere between late October 2008 and early May 2013, which thanked Fresh Start's Executive Director, Larry Trahant, and the Narconon Fresh Start Team for their "tremendous back up in introducing LRH to the world and are saving lives on a daily basis. There are thousands of beings who have taken their first steps on The Bridge, thanks to the compassion and efforts of this team." The bridge, of course, refers to the courses and auditing that one takes along the journey to total freedom to which supposedly Scientology leads.

Narconon officials insist that it is a secular program, but the IRS/Scientology tax agreement makes this claim highly improbable, at least in the United States. The public has access only to the penultimate version of the agreement leaked to the *Wall Street Journal*, as Scientology will not release the signed agreement, but in that version the IRS granted charitable status to the Church of Scientology and the entities of what it called "the Scientology religion."<sup>83</sup> The primary law under which the IRS grants charitable status is the "Exempt Purposes—Internal Revenue Code Section 501(c)(3)." It grants this status when, in part, applicant organizations meet one or more classifications as being (among many others) "charitable" or "religious."<sup>84</sup> Scientology leaders apparently convinced IRS officials that the conglomerate was religious in nature, which served as the official basis<sup>85</sup> for its non-profit, charitable designation.<sup>86</sup>

Within the IRS/Scientology agreement itself, provisions existed for the charitable designation to include Scientology-related entities. One set of entities were those that "deliver[ed] religious services to parishioners,"<sup>87</sup> and these entities delivered (among other things) the numerous courses and programs, including the Purification Rundown. Listed, for example, among the "Dianetics and Scientology Introductory Courses" in a 1998 "Bridge to Total Freedom" chart was the "Purification Route," which specifically included the "Purification Rundown,"<sup>88</sup> and the anonymous editors to Hubbard's book on the Rundown stated that "Scientology churches and organizations are fully set up to deliver the Purification program...."<sup>89</sup>

Another classification of entities in the IRS/Scientology agreement concerning charitable status involved ones that provided "social benefit and other public benefit." Among the specific entities listed were Narconon International and Narconon's oversight organization, the Association for Better Living and Education (ABLE).<sup>90</sup> Among the provisions for charities under the IRS is that these types of charities, among other undertakings, combat "community deterioration and juvenile delinquency," and Scientology likely convinced the IRS that Narconon

as a supposed drug-treatment program met these requirements. When, therefore, Narconon Pacific Coast submitted its 2015 tax form, it did so by identifying itself as a 501(c)(3) corporation whose “primary exempt purpose” was “drug rehabilitation and prevention of substance abuse.”<sup>91</sup> Similarly, when Narconon of Oklahoma (a.k.a. Narconon Arrowhead) in Canadian, Oklahoma filed its 2015 income tax return, it did so on the form for organizations having 501(c)(3) status, describing its “mission or most significant activities” as “drug rehabilitation and educational services based on the technology developed by L. Ron Hubbard.”<sup>92</sup>

The Purification Rundown, however, in which Scientologists enroll within Scientology facilities is the same as the one that non-Scientologists take within all Narconon programs. Scientology’s large overview book, *What is Scientology?*, made the connection directly when it discussed the Narconon New Life Detoxification Program: “the person cleanses his [sic] body of drug residues and other toxic substances through a regime of exercise, sauna and nutritional supplements as described in the book *Clear Body, Clear Mind: The Effective Purification Program* by L. Ron Hubbard.”<sup>93</sup> Indeed, within the rules of doctrinal adherence that Hubbard himself designed, any organization - Narconon included - that used anything *other* than his own directives would be “squirrelling,” which is a Scientology term for the forbidden practice of “going off into weird practices or altering Scientology.”<sup>94</sup>

Within the United States, therefore, the supposedly secular cornerstone of the Narconon program, the Purification Rundown, is the same one the Scientologists undergo when following one of Hubbard’s supposedly religious scriptures as recognized by the IRS. Scientology, therefore, is one of many religions and similar ideologies in America that advocates alternative medical treatments,<sup>95</sup> so the IRS designation of the organization as a nonprofit charity in no way mitigates its simultaneous designation as an organization offering controversial and possibly dangerous pseudo-medicine.

On an issue related to Narconon’s relationship to Scientology, an inescapable conclusion is that Narconon is a recruitment program into the Scientology organization. This is the conclusion that the Minnesota’s St. Cloud Reformatory for Men reached after its staff launched a raid against Narconon in its facility, fearing that the program was not primarily concerned with the best interests of the clients but rather was concerned about the interests of an organization whose influence it downplayed or denied.<sup>96</sup>

## VII. THE PURIFICATION RUNDOWN: ITS CRITICS AND ELITE DEFENDERS

### A. Scientific and Medical Elites

On December 4, 1979, Hubbard introduced a program entitled “the Purification Rundown,” which quickly became a significant part of the Narconon program, and of Scientology in general. By early February 1983, for example, “‘purification’ centers” (which I assume were either Narconon programs or purification programs just for members) operated in Philadelphia, Boise, Seattle, Toronto, Los Angeles, and Sacramento, with one already having closed in Miami.<sup>97</sup> Prior to this rundown, the drug rundown in Narconon involved a client generating a number of drug-related images in order to eliminate positive associations with drug-taking.<sup>98</sup> The Purification Rundown was not simply another series of mental processes; it involved (according to Hubbard) techniques that actually allowed one’s body to purge chemical and radiation residues. This drug and radiation purge comes as a result of exercise (running), a sauna-sweat, heavy vitamin ingestion, ingestible oil, and “a properly ordered personal schedule” [i.e., adequate sleep and regular commitment to the program].<sup>99</sup>

For years, specialists have criticized the high doses of vitamins and minerals that people take as part of the supposed drug expulsion in the Purification Rundown’s sauna. In the December 1991 “Findings of Fact Regarding the Narconon-Chilocco Application,” Oklahoma’s Board of Mental Health concluded:

The Narconon program includes the administration of high doses of vitamins and minerals to the Narconon patient as part of their treatment. The use of high amounts of vitamins and minerals in the amounts described administered by Narconon can be potentially dangerous to the patients of Narconon according to more credible medical evidence.<sup>100</sup>

Looking specifically at niacin, the University of Maryland Medical Center reported that the recommended daily dosage for men who were 19 years of age or older should be 16 mg, and for women of the same age the recommended daily dosage was 14 mg.<sup>101</sup> In the *Narconon New Life Detoxification Program*, Hubbard insisted that “[o]n the program niacin is taken in the *exact* amounts advised. This is very important for a successful result.”<sup>102</sup> When Hubbard presented this purification program in 1979, the niacin amount began at 100 mg a day, “then increased

gradiently to as high as 5000 mg.”<sup>103</sup> Such high amounts of niacin pose real threats to people’s health.

The University of Maryland Medical Center cautioned:

High doses (50 mg or more) of niacin can cause side effects. The most common side effect is called ‘niacin flush,’ which is a burning, tingling sensation in the face and chest, and red or flushed skin.... At very high doses used to lower cholesterol and treat other conditions, liver damage and stomach ulcers can occur.<sup>104</sup>

A chart (see Appendix) shows the differences between Narconon’s required amounts of vitamins and those recommended by American and Canadian governmental agencies. These dosage amounts are based upon assumptions about healthy people, but as Manca pointed out, “large doses of some vitamins [...] can potentially harm patients, especially if they have specific ailments that react to specific vitamins.”<sup>105</sup> The amounts currently taken in the Narconon program indicate that its program’s leaders are not acting responsibly toward clients regarding some amounts of vitamin intake.

Other concerns exist about the amount of time Narconon clients can spend in saunas. Hubbard indicated, “[t]he major part of the 5-hour daily period on the Purification Rundown is spent in the sauna bath, after working up the circulation by a period of running.”<sup>106</sup> He allowed Scientologists to build either a dry or wet sauna,<sup>107</sup> and stated, “[s]weating in the sauna is done at temperatures ranging anywhere from 140 degrees [60 degrees C] to 180 degrees [82.2 degrees C].”<sup>108</sup> He did not mention anything about humidity levels, and I am unable to find specific information about temperature consistencies or variations that may exist in Narconon sauna facilities.

Contemporary research provides very limited but contradictory conclusions about which kind of sauna puts the body under more stress. A 2013 article by Japanese researchers reviewed comparative findings on physiology after seven healthy men spent ten minutes in a mist (wet) sauna at 40 degrees C [104 degrees F] with relative humidity at 100% and the same amount of time in a dry sauna at 70 degrees C [158 degrees F] with a relative humidity at 15%. They concluded:

Mist sauna provides [a] less heat stressful environment than dry sauna, including less blood pressure rise, less heart rate increase, less dehydration, and more efficacy in vasodilatation and sweating. This means mist sauna is more tender and safer than dry

sauna with more efficiency on thermoregulatory function.<sup>109</sup>

The next year, a Polish study concluded differently. Ten healthy males underwent three dry sauna baths for fifteen minutes at 91degrees C/195.8 degrees F with humidity between 5-18%, with five minute breaks between the sessions. Then a month later they underwent steam sauna baths at 59 degrees C/138.2 degrees F with 60.5% humidity for the same amount of time and exposure. The researchers who conducted the experiment concluded findings that contradicted the Japanese study:

The wet sauna where the humidity is higher causes a much greater load of heat for the organism compared to the dry sauna bath. This is evidenced by greater increase of rectal temperature, greater increase of heart rate, by the intensive subjective sensation indicated [by the research subjects], and by a greater physiological strain index during bathing in the wet sauna.<sup>110</sup>

Obviously, the results of the Polish and Japanese studies conflict.

Very useful, however, for examining Narconon is to highlight how long both studies kept subjects in saunas before measuring initial physiological stress. The Japanese researchers kept people in saunas for ten minutes, and the Polish researchers took stress measurements after subjects were in saunas three times for fifteen minutes, with a month break in between the two different types of saunas. In contrast, the Narconon program can have people in saunas for hours - nearly five hours if clients undertake runs before entering them. Even if one allows time for occasional sauna breaks in which individuals cool down somewhat and drink fluids, they remain in saunas for lengths of time that, if compared to what researchers use to get initial stress measurements, are likely to cause heat stress to the body.

Heat stress on bodies in saunas can be serious, even deadly. In a 2008 study that examined Finish sauna death autopsy documents from 1990 to 2002 in the Helsinki area, heat was the likely cause of natural death in 51% of the cases:

In a hot environment, physiological changes, such as increased heart rate, cardiac output, and noradrenalin secretion lead to elevated oxygen consumption of cardiac muscle. Moreover, hemoconcentration results from sweating and loss of body fluids and electrolytes enhances the risk of blood clotting.... In these circumstances, the probability of coronary or other sudden cardiac or cerebrovascular events increases, especially in persons with chronic heart or vascular diseases.<sup>111</sup>

Said simply, people experience heatstroke, which is a potentially deadly condition. It:

occurs when the body is unable to eradicate the excess heat as rapidly as it develops. Thus, body temperature begins to rise. Sweating stops because the water content of the blood decreases. The loss of evaporative cooling causes body temperature to continue rising rapidly, soon reaching a level that can cause organ damage. In particular, the brain, heart, and kidneys may begin to fail until the patient experiences convulsions, coma, and even death. If heat exhaustion is not recognized and treated, it can lead to life-threatening heatstroke.<sup>112</sup>

As another source explains, “[t]he core temperature [of the body] has to be kept within strict limits; otherwise the brain and heart will be compromised, and death will result.”<sup>113</sup> With the exceedingly long periods of time that Narconon and Purification Rundown clients may stay in saunas - up to five hours minus running time and possible breaks - without the likelihood of careful medical supervision, the possibility of heat stroke becomes dangerously real.

These and other criticisms of Narconon and its purification component rarely if ever appear in the analyses by a front group of professionals who produced studies that purportedly support Narconon’s success claims and the Purification Rundown’s body-cleansing techniques. Commenting generally about such analyses, Manca suggested, “although these studies may appear scientific, they are most likely instances of [...] activists from an alternative medicine convincing scientists involved in dominant research to align their research program with the activists’ goals.”<sup>114</sup>

The second course book in the Narconon program is entitled *Narconon New Life Detoxification Program Delivery Manual*, and it enters clients into the Purification Rundown. On the title page of the book, the manual states that it is “Based on the book, *Clear Body Clear Mind, The Effective Purification Program* [by] L. Ron Hubbard.”<sup>115</sup> Important to note about it is that - despite Narconon’s overall anti-medical bias - this particular course book contains a letter from a physician, Gene Denk (d. 2004) , discussing an article that he and doctors Megan Shields (d. 2016) and Steven Burton published about Narconon in the journal *Medical Hypotheses*. The study concluded by determining that “[t]he program appears safe as long as done under the care of a physician.”<sup>116</sup> Readers, however, likely will not know that Dr. Denk was a Scientologist and L. Ron Hubbard’s personal physician,<sup>117</sup> and Dr. Shields was an active Scientologist.<sup>118</sup> The journal in which they published their favorable article on the Narconon detoxification program, *Medical Hypotheses*, was a speculative - not a peer-reviewed - journal, so the article has limited

if any scientific probity.<sup>119</sup>

These physicians published their “research” that they conducted under the auspice of the Foundation for Advancements in Science and Education (FASE), which actually is a Scientology front group designed to advance Scientology in the scientific and educational communities. Insight into FASE comes from the examination of correspondence written by a PhD researcher (David Schnare), who had worked and written for FASE at the same time that he was a policy analyst for the United States Environmental Protection Agency, but who eventually severed his FASE and Scientology affiliations. In response to a Japanese medical doctor who queried him about the possibility of conducting a study with FASE, Schnare responded:

The organization I have discussed is actually two separate groups that work very closely, and which have had joint fiscal arrangements and joint management at times in the past. The so-called research element is FASE - the Foundation for Advancements in Science and Education, a group formed for the express purpose of promoting the use of practices developed by Hubbard and the Church of Scientology... They do not appear to have any competent research scientist now on their staff, and depend on affiliations with scientists from the academic or governmental community. As such, without outside help, they are not competent to mount a research effort on their own, and would be very hard pressed to answer any scientific questions you may have. They are relatively well informed on the specific treatment, but are likely to be unwilling to assist you unless you promise to make no changes to the treatment regimen and are willing to let them use you in their promotional activities. The director of FASE is Steven R. Heard, a high school graduate who was a former senior public affairs officer for the Church of Scientology. His deputy is Jack Dirman, of similar academic and religious background. I severed all ties to FASE a few years ago due to their unwillingness to foster meaningful research.

The medical organization is called HealthMed, and is simply a trendy medical practice where a few physicians direct a staff who provides the treatment... The executive director of HealthMed is Michael Wisner, a former undercover agent for the Church of Scientology, who has little technical background, and is unable to maintain a scientific conversation. He has no medical background. The lead physician is Dr. Megan Shields. She is a competent physician without significant research credentials.... [HealthMed staff] actually believe that Hubbard’s estate owns the [Narconon] treatment, and that it must be licensed.<sup>120</sup>

Many people in the medical and scientific communities do not know about the pseudo-scientific nature of FASE and the *Medical Hypotheses* journal, so they would not necessarily be skeptical of published research supporting Narconon and the Purification Rundown’s techniques and assumptions that this organization sponsors and that appear in the publication.

## B. Social and Cultural Elites: Celebrities

Even less likely than some scientific and medical elites being skeptical about Narconon's claims when published as disguised pseudo-science are social and cultural celebrities - people who have obtained public recognition through the arts, entertainment, and sports industries but have little if any training in medical or health issues. As far back as 1951, Hubbard realized how effective these celebrities could be in shaping public opinion.<sup>121</sup> Consequently, in 1955 he created "Project Celebrity"<sup>122</sup> in which he encouraged Scientologists to actively recruit celebrities with the hope that they would go on to endorse publically his ideological creation.

Specifically regarding Narconon, Hubbard's hopes were realized, since over the years a number of celebrities have endorsed the program and its Purification Rundown. In January 1974, Scientologist and San Francisco 49ers football quarterback, John Brodie (b. 1935), organized a charity football game for Narconon, raising \$1,000.00 for it.<sup>123</sup> In 1980, Scientologist Cathy Lee Crosby (b. 1944) mentioned the "Purification Program" and the "Friends of Narconon" in her testimony before the United States House of Representatives Select Committee on Narcotics Abuse and Control.<sup>124</sup> In 1982, actress Kirstie Alley worked at Narconon in Los Angeles,<sup>125</sup> and eventually she became Narconon's international spokesperson.<sup>126</sup> In 1990, when a Russian delegation visited Los Angeles to explore the possibility of establishing Narconon in their country, Alley hosted a party for them at her house, which Scientologist Chick Corea also attended.<sup>127</sup> In June 1999, John Travolta, "in conjunction with Paramount Pictures, held a benefit screening for Narconon International of John's most recent movie, *The Gentleman's Daughter*."<sup>128</sup> Scientology's biggest movie star, Tom Cruise, visited Oklahoma's Narconon Arrowhead facility in 2001.<sup>129</sup> Certainly this kind of celebrity support kept the program in the public eye and likely enhanced its status with at least some of the clients or students who took it. Nevertheless, these celebrities were not qualified to comment authoritatively on Narconon's efficacy, safety, and effectiveness.

## VIII. NARCONON COURSES AND THE RELIGION OF SCIENTOLOGY

Several Scientology celebrities could, and did, proclaim publicly that the program had gotten them off drugs, while others extolled the reputed virtues of Narconon without necessarily having

any direct experience of it. None of the celebrities, however, tried to explain precisely how the Narconon courses assisted in the detoxification process, or how they differed from regular Scientology offerings. They would have been hard-pressed to do so.

Just as the second coursebook in the Narconon program is based upon Scientology's Purification Rundown, all seven of the remaining coursebooks are based upon Scientology bulletins. The Narconon courses use the same concepts and terminologies that appear in Scientology. In many instances, one must know a Scientology term in order to make sense out of something written in a Narconon context. Book 1, *Narconon Therapeutic TR Course*,<sup>130</sup> is a direct borrowing and in places an exact copy of an entry-level Scientology course called the TRs (Training Routines),<sup>131</sup> and which Scientology discusses at great length in *The Scientology Handbook*.<sup>132</sup> The above-discussed second book is based upon Scientology's Purification Rundown. The third book, *Narconon Learning Improvement Course*, simply reiterates Scientology's theories about how people best learn information, and summarized in the "Technology of Study" section of *The Scientology Handbook*.<sup>133</sup> Book 4a of Narconon essentially redoes the first book's training routines, albeit somewhat more intensely. Book 4b, *Narconon Communication & Perception Course*, also comes from Scientology courses on giving and receiving forms of commands, orders, and other forms of communication.<sup>134</sup>

Book 5, *Narconon Ups and Downs in Life Course*,<sup>135</sup> identifies important "personality types" according to Scientology's classification system. It closely parallels Scientology's *Overcoming Ups and Downs in Life*,<sup>136</sup> and borrows wording directly from *The Scientology Handbook*.<sup>137</sup> The sixth Narconon course is the *Narconon Personal Values and Integrity Course*.<sup>138</sup> It closely follows, and borrows heavily from, Scientology's *Personal Values & Integrity* course (1989), which also is based on the works of L. Ron Hubbard. Both courses teach Scientology's "eight dynamics of existence" or levels, in which one strives to survive, along with presenting an honor code and discussing Scientology's version of personal integrity. Book 7 in the Narconon series, *Narconon Changing Conditions of Life Course*,<sup>139</sup> discusses the ethics conditions, which are akin to Scientology labels supposedly identifying one's relationship to an organization, along with an individual's relationship to various levels (called dynamics) of life and existence. These same terms appear in Scientology terms listed in *The Scientology Handbook*.<sup>140</sup> Book 8, *Narconon The Way to Happiness Course*<sup>141</sup> is a repackaged presentation of *The Way to Happiness*,<sup>142</sup> written as a secular moral code to attract attention to the author (Hubbard) and other items that he had written, i.e. Scientology. Working with Hubbard,

Scientology leaders had designed *The Way to Happiness* as a recruitment tool, so in addition to it providing moral and ethical admonitions, it also may have motivated some Narconon clients to explore more of Hubbard's works.<sup>143</sup> In summary, each of the Narconon courses borrowed concepts and language directly from Scientology sources. Someone studying Narconon's courses, therefore, is also directly studying Scientology. None of them, however, have obvious applications to drug addiction therapy.

## IX. CONCLUSION

Undeterred by any and all criticism, Narconon attempts to forge ahead. In mid-September, 2015, Narconon opened a facility in Villa Victoria, Mexico, designed to both deliver the so-called detoxification program and train Latin American personnel who may wish to open centers in their own countries.<sup>144</sup> Almost simultaneously, a new Narconon center opened in Ojai, California, specifically hoping to attract as clientele "artists and leaders in society."<sup>145</sup> Actor and wife of John Travolta, Kelly Preston, stated at its opening:

Year after year we are losing our artists and colleagues we've worked with - often at too young an age. To make the tragedy even more distinct is the fact that we do have the solution that could have turned those lives around. We just haven't had the location to deliver it. Until now.<sup>146</sup>

Scientology, however, is not simply relying on celebrities to endorse its Narconon program. Since 2003, it has hired a member (Greg Mitchell) who is a lawyer/lobbyist in Washington, D.C. to lobby the American government on behalf of Hubbard's supposedly secular technology used by ABLE. Among other efforts, Mitchell has attempted to secure federal funds for 9/11 workers in New York to take the Narconon program<sup>147</sup> - the same program that Tom Cruise has supported. Undoubtedly on behalf of this and other Scientology programs, celebrity Jenna Elfman, who completed the Purification Rundown in 1996,<sup>148</sup> and Mitchell threw a party at the Scientology building near Dupont Circle in late 2006.<sup>149</sup> For his lobbying efforts between 2005 and 2012 (inclusive), the Church of Scientology International paid Mitchell \$590,000.<sup>150</sup>

Narconon is under crippling scrutiny in North America, and has encountered serious opposition elsewhere around the world. In the United States, courts across the country registered 118 lawsuits against Narconon centers between 1992 and mid-January 2015.<sup>151</sup> The website,

<narcononreviews.net>, contains information on ninety-six lawsuits involving Narconon, along with fifty-eight formal complaints, fourteen formal reports, and forty-eight inspection reports. Beginning in early June and extending into late March 2005, a series of twenty articles about Narconon in the *San Francisco Chronicle* led to Narconon's anti-drug program being "barred from San Francisco classrooms because of concerns about its scientific accuracy,"<sup>152</sup> even though parts of it crept back into some schools within several years.<sup>153</sup> Canada's only Narconon program, which was in Trois Rivières (Quebec), closed in April 2012, under orders of the local health and social services agency.<sup>154</sup> Its most persistent critic, former-client-turned-staff-turned-opponent of the Canadian facility, David Love, subsequently won an undisclosed amount of money from a decision against the facility for a wide range of neglectful, fraudulent, deceitful, unscientific, and "humiliating and degrading practices," including "forced confinement and coercion."<sup>155</sup> Elsewhere, Narconon has ceased operations in France,<sup>156</sup> Russia,<sup>157</sup> and Atlanta, Georgia.<sup>158</sup> By late 2012 the program had closed in the United Kingdom,<sup>159</sup> but in mid-September 2015 another center opened in Heathfield.<sup>160</sup> Between August 2015 and December 8 2015, the Heathfield facility only admitted three students,<sup>161</sup> and on August 15, 2016 it had only two students.<sup>162</sup> During 2016, however, some 35,000 students in British schools had received Narconon's teachings about drugs.<sup>163</sup> In Oklahoma, four deaths of clients associated with Narconon spawned investigations into the program and lawsuits against it,<sup>164</sup> while additional lawsuits allege "fraud, deceit, breach of contract and civil conspiracy"<sup>165</sup> as well as Narconon staff allegedly having traded drugs for sex.<sup>166</sup> January-to early April 2014 financial records from one Oklahoma facility suggests that the facility was in significant cash-flow trouble.<sup>167</sup>

The National Association of Forensic Counselors, Inc., is suing: Narconon International; specific Narconon organizations in Oklahoma, Georgia, Hawaii, California, Indiana, Florida, Colorado, Texas, Virginia, Trois-Rivieres (Quebec, Canada), and the United Kingdom; plus numerous companies and individuals - allegedly for falsely claiming to have received its certification.<sup>168</sup> A class action suit against Narconon of Northern California, Narconon Fresh Start, Association for Better Living and Education International, Narconon International, and several other related organizations continues in California.<sup>169</sup> Residents in three Ontario Canadian communities (Marmora, Hockley Village, and Milton),<sup>170</sup> two Australian communities (Warburton, east of Melbourne in Victoria and Yarramalong Valley on the New South Wales Central Coast),<sup>171</sup> and one rural American town (Trout Run in Frederick County, Maryland)<sup>172</sup>

have blocked, for the time being, the establishment of Narconon facilities in their respective areas.

Reviewing a history of Narconon's efforts, it is obvious that it has had difficulty identifying an effective and defensible twofold legitimization claim that it is not part of either the Scientology "cult" or the Scientology religion, and that its procedures and claims have scientific validation. More complicated than the pattern that Manca identified of Scientology cloaking its pseudo-medical practices under the guise of religion, in various eras Narconon has acknowledged its Scientology connection, denied its Scientology connection, and claimed that its public program offering Narconon to non-Scientologists was secular and research-verified.

However, with contemporary negative public opinion seemingly solidifying, lawsuits multiplying, and unanswered facts about recidivism and the scientific basis for many of its claims about drugs, Narconon cannot survive in its present operational form. Even if, in the United States, it were to declare itself to be a strictly religious practice (seemingly in line with the Internal Revenue Service settlement), then questions still would continue about its potential to do harm through high vitamin ingestions, saunas, and running. Increasingly, countries are likely to ban the practice as a medically and professionally unsound set of procedures, based upon pseudo-science and achieving vague but low success rates.

Outside of the United States, where the evidence seems overwhelming that Narconon is indistinguishable from aspects of the Scientology religion, as designated in the IRS/Scientology charitable agreement, determination of Narconon's legal status (which might influence evaluations of any Scientology-related religious aspects) varies among countries. For example, in Australia, Scientology (as the Church of the New Faith) is "a recognized denomination under the Commonwealth Marriages Act,"<sup>173</sup> while Narconon Australia Ltd. is an "Unlisted public non-profit company at Registrar of Companies."<sup>174</sup> In the United Kingdom, "the Church of Scientology is now considered to be a religion for the purposes of the Places of Religious Worship Act of 1855, [but] is not currently considered to be a charity for the advancement of religion...."<sup>175</sup> Narconon United Kingdom, however, is a "Charitable Incorporated Organization."<sup>176</sup> What appears to be an accurate and comprehensive list of Scientology's legal status in thirty-eight countries shows how diverse its legal status is,<sup>177</sup> but nothing even somewhat comparable to that list exists for Narconon beyond 1998.<sup>178</sup> Regardless, however, of the country in which it operates, Narconon's programs are grounded in Scientology and Hubbard's doctrines, and some of Narconon's practices raise serious medical concerns.

## FOOTNOTES

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- <sup>3</sup> Narconon International, "Narconon Worldwide: Drug and Alcohol Rehabilitation Centers," 2017, accessed July 13, 2017, [www.narconon.ca/centers/](http://www.narconon.ca/centers/).
- <sup>4</sup> Substance Abuse and Mental Health Services Administration [SAMHSA], "Behavioral Health Treatment Services Locator," accessed November 30, 2016, 3 pp. <https://findtreatment.samhsa.gov/>.
- <sup>5</sup> Friends of Narconon Intl., "Success Stories," 1995-2015, [http://www.friendsofnarconon.org/drug\\_rehab/index.php?option=content&task=view&id=66](http://www.friendsofnarconon.org/drug_rehab/index.php?option=content&task=view&id=66).
- <sup>6</sup> Ben Gidley, "Doing Historical and Archival Research," in *Researching Society and Culture*, edited by Clive Seale (London: Sage Publications, 2004), 261.
- <sup>7</sup> Stephen Kent, "Deviance Labelling and Normative Strategies in the Canadian 'New Religions/Countercult' "Debate," *Canadian Journal of Sociology* 15, 4 (1990); see Gidley, "Doing Historical and Archival Research," 254.
- <sup>8</sup> Gidley, "Doing Historical and Archival Research," 255.
- <sup>9</sup> Gidley, "Doing Historical and Archival Research," 261.
- <sup>10</sup> Terra Manca, "Alternative Therapy, Dianetics, and Scientology," *Marburg Journal of Religion* 15 (2010), [https://www.uni-marburg.de/fb03/ivk/mjr/pdfs/2010/articles/manca\\_2010.pdf](https://www.uni-marburg.de/fb03/ivk/mjr/pdfs/2010/articles/manca_2010.pdf).
- <sup>11</sup> John Scott and Gordon Marshall, *Oxford Dictionary of Sociology* (London: Oxford University Press, 2005), 619.
- <sup>12</sup> Manca, "Alternative Medicine," 2.
- <sup>13</sup> Stephen A. Kent, "The Creation of 'Religious' Scientology," *Religious Studies and Theology* 18, 2 (1999): 97-126.
- <sup>14</sup> Terra Manca, "L. Ron Hubbard's Alternative to the Bomb Shelter: Scientology's Emergence as a Pseudo-science During the 1950s," *Journal of Religion and Popular Culture* 24, 1 (Spring 2012): 81.

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<sup>15</sup> Manca, "Alternative Medicine," 7.

<sup>16</sup> William Benitez quoted in Narconon, "Narconon Drug Rehabilitation Program," [early 1970s].

<sup>17</sup> Narconon, "Freedom Inside the Walls; Now Expanding to the Outside," Los Angeles, n. d., [1]; Narconon, "The Narconon Rehabilitation Program," 1971, [1].

<sup>18</sup> Narconon, "Freedom Inside the Walls," [1].

<sup>19</sup> Mark Jones, "Declaration of Mark Jones," Los Angeles, February 10, 1995, [www.xenu.net/archive/oca/narconon/jones.html](http://www.xenu.net/archive/oca/narconon/jones.html).

<sup>20</sup> Narconon, "Freedom Inside the Walls," [1].

<sup>21</sup> John A. Burns to Ronald Reagan, correspondence, 11 February 1970.

<sup>22</sup> Narconon, "The Narconon Rehabilitation Program," [1].

<sup>23</sup> Narconon, "Freedom Inside the Walls," [2].

<sup>24</sup> Narconon, "Narconon Drug Rehabilitation Program," 12.

<sup>25</sup> Bill Frank, "Narconon is a Drug Program that is Working," *Morning News* [Wilmington, Delaware], April 11, 1973.

<sup>26</sup> Narconon International, 2015, <http://www.narconon.org/history/>.

<sup>27</sup> John Schwartz, "Narconon Achieves at Least a 70 Percent Success Rate in the Arizona Prison," *Arizona Republic*, December 9, 1972, <http://www.narconon.org/history/>.

<sup>28</sup> Frank Gerbode, "To Whom It My Concern," letter, 15 February 1973. Worth noting is that an evaluation of Narconon New Life in Los Angeles some eighteen months later stated, "Narconon claims to have an 86% cure rate for narcotics addicts which is simply not true." (Forest S. Tennant et. al., "Evaluation of Narconon New Life," October 31, 1974, 27.) I cannot determine whether Gerbode was involved with Scientology at the time he wrote this letter, but he certainly was in the late 1970s. See "The Truth About Scientology: Frank Gerbode - Scientology Service Completions," <http://www.truthaboutscientology.com/stats/by-name/f/frank-a.-gerbode.html>. In an undated handout (probably from the late 1980s), published by The Foundation for Advancements in Science and Education, Gerbode appeared as a member of its "Executive Committee on Science." (The Foundation for Advancements in Science and Education [FASE], Information Sheet, [n.p. and n.d. (early 1980s?)], 4 pp.)

<sup>29</sup> Evelyn Richards, "City of Palo Alto Quits Drug Treatment Program," *Palo Alto Times*, December 7, 1976, 1, 3.

<sup>30</sup> Social and Community Services Administration, "Annual Performance Evaluation of the City of Palo Alto's Contract with Narconon Palo Alto," Palo Alto, CA, January 1977, 39.

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<sup>31</sup> Ibid., 32.

<sup>32</sup> Ibid.

<sup>33</sup> Ibid., 33.

<sup>34</sup> Ibid.

<sup>35</sup> Ibid., 30.

<sup>36</sup> Ibid., 31.

<sup>37</sup> Ibid., 32.

<sup>38</sup> Ibid., 17.

<sup>39</sup> Linda McQuaig, "Father Wishes He'd Ignored Scientologists," *Globe and Mail*, April 20, 1976.

<sup>40</sup> City of Palo Alto Social and Community Services Administration, "Annual Performance Evaluation," 18.

<sup>41</sup> Manca, "Alternative Therapy," 2; borrowing from Peter Morely and Roy Wallis, "Introduction," in Peter Morely and Roy Wallis, ed., *Marginal Medicine: Original Papers on Christian Science, Dianetics, Pentecostal Healing Health-Care Practices in the Deep South, and Other Unorthodox Forms of Medical Treatment* (New York: The Free Press, 1976), 9-22.

<sup>42</sup> City of Palo Alto Social and Community Services Administration, "Annual Performance Evaluation," 18.38, see 28.

<sup>43</sup> Ibid., 37.

<sup>44</sup> Ibid., 32, see 27.

<sup>45</sup> Ibid., 22.

<sup>46</sup> Ibid.

<sup>47</sup> Ibid., 17.

<sup>48</sup> Ibid., 21.

<sup>49</sup> Ibid., 27, 39.

<sup>50</sup> Ibid., 12, 37.

<sup>51</sup> Ibid., 30.

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<sup>52</sup> Ibid., 30.

<sup>53</sup> Ibid., 30-31.

<sup>54</sup> Ibid., 31-32.

<sup>55</sup> Ibid., 23.

<sup>56</sup> Ibid., 23.

<sup>57</sup> Nate Jessop (Project Coordinator for Narconon Palo Alto) to Alec Andrus (Palo Alto Staff Liaison - Social & Community Services), 25 June 1976, 1.

<sup>58</sup> Brendon M. Moore to Councilperson [Palo Alto], 14 April 1976.

<sup>59</sup> Alec Andrus (Administrator, Social and Community Services) to Brendon M. Moore, 21 July 1976.

<sup>60</sup> Alec Andrus (Administrator, Social and Community Services) to Brendon Moore, 25 August 1976.

<sup>61</sup> Press Release, "Albertans Ordered to Cease Harassment," August 18, 1977.

<sup>62</sup> Jay Thorwaldson, "Narconon Treats Few, Records Show," *Palo Alto Weekly*, November 25, 1976; City of Palo Alto Social and Community Services Administration, "Annual Performance Evaluation," 27.

<sup>63</sup> City of Palo Alto Social and Community Services Administration, "Annual Performance Evaluation," 37.

<sup>64</sup> Thorwaldson, "Narconon Treats Few."

<sup>65</sup> *Flint Journal* [Flint, Michigan], "[Foundation Backing Purification] Headed by 2 Scientologists," February 6, 1983, A5.

<sup>66</sup> Citizens Freedom Foundation, "More Taxpayers' \$ to a Cult (or is Michigan Helping Scientology Pay Their Court Costs?)" April 1, 1980, 5, 4.

<sup>67</sup> Jon Atack, *A Piece of Blue Sky: Scientology, Dianetics, and L. Ron Hubbard Exposed* (New York: Lyle Stuart 1990), 226-241.

<sup>68</sup> Paul Fishman Maccabee, "The Narconon Sting: Scientology's Minnesota Drug Scam," *Twin Cities Reader*, October 1-7, 1981, 7.

<sup>69</sup> L. Ron Hubbard, *Modern Management Technology Defined*, 3<sup>rd</sup> ed. (1976; repr., Copenhagen: New Era Productions, 1985), 179, in L. Ron Hubbard, "Ethics," *Hubbard Communications Office Policy Letter*, June 18, 1968.

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<sup>70</sup> L. Ron Hubbard [probable author], "Intelligence Actions Covert Intelligence Data Collection," [Memo Sent to the Guardian WW Worldwide], December 6, 1969, 6.

<sup>71</sup> L. Ron Hubbard, "The War," *Executive Directive from L. Ron Hubbard, LRH ED 55 INT*, November 29, 1968.

<sup>72</sup> Stephen A. Kent and Terra Manca, "A War Over Mental Health Professionalism: Scientology Versus Psychiatry," *Mental Health, Religion & Culture* (2012): 1-23.

<sup>73</sup> Manca, "Alternative Medicine," 7.

<sup>74</sup> Narconon, "Narconon: The Workable Rehabilitation Program for Drug and Alcohol Abuse," n. p. and n. d., 72.

<sup>75</sup> L. Ron Hubbard, *Scientology: The Fundamentals of Thought, The Basic Book of the Theory & Practice of Scientology for Beginners* (Silver Spring, Maryland: Hubbard Association of Scientologists International, 1956), in: Church of Scientology of California, *What is Scientology?* (Los Angeles: Church of Scientology of California: 1978), 303.

<sup>76</sup> Narconon, "The Narconon Rehabilitation Program," [2].

<sup>77</sup> Stephen Goodban, Dissem Sec [Dissemination Secretary], "Narconon to Lorna Levett," 17 February 1972.

<sup>78</sup> L. Ron Hubbard, "Narconon," *Sea Organization Flag Bureau Data Letter 220*, August 29, 1972.

<sup>79</sup> Ibid. I do not know to what country or state Hubbard was referring when he said that a state and a country were fully funding the program. The Guardian's Office (or Office of the Guardian) was a division of Scientology that Hubbard established in 1966 to handle areas such as intelligence gathering and related (sometimes covert) operations, public relations, legal and financial issues, and social reform programs. See: Jon Atack, *A Piece of Blue Sky: Scientology, Dianetics, and L. Ron Hubbard Exposed* (Secaucus, New Jersey: Lyle Stewart, 1990), 217-241; Jodi Lane and Stephen A. Kent, "Malignant Narcissism, L. Ron Hubbard, and Scientology's Policies of Narcissistic Rage," 20-35; English Translation of "Politiques de Rage et Narcissisme Malin," *Criminologie* 41, no. 2 (2008): 117-155; Tony Ortega, *The Unbreakable Miss Lovely: How the Church of Scientology Tried to Destroy Paulette Cooper* (London: Silvertail Books, 2015), 185ff.

<sup>80</sup> L. Ron Hubbard, *Narconon News* 6/3, Special Edition, 1974.

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<sup>84</sup> IRS, "Exempt Purposes—Internal Revenue Code Section 50(c)(3), Updated April 12, 2017, accessed June 4, 2017, downloaded from: <https://www.irs.gov/charities-non-profits.charitable-organizations/exempt-purposes-internal-revenue-code-section-501c3>.

<sup>85</sup> For a discussion of some unofficial reasons that may have influenced the IRS's decision to grant Scientology and all of its American entities charitable status, see Douglas Franz, "Scientology's Puzzling Journey From Tax Rebel to Tax Exempt," *New York Times* (March 9, 1997), downloaded from: <http://www.nytimes.com/1997/03/09/us/scientology-s-puzzling-journey-from-tax-rebel-to-tax-exempt.html> on June 4, 2017.

<sup>86</sup> Nonprofits are organizations established for the mutual benefit of a group of people (such as sports clubs, homeownership organizations, community organizations, etc.), in which no one profits. Charities are organizations that also do not provide profits for individuals, but operate for the general public good (such as religions, educational institutions, and hospitals). Consequently, all charities are nonprofits, but not all nonprofits are charities. See: Score, "What is the Difference Between a Nonprofit Organization and a Charity?" December 22, 2013, accessed June 4, 2017, <https://www.score.org/resource/what-difference-between-nonprofit-organization-and-charity>.

<sup>87</sup> Department of the Treasury - Internal Revenue Service (1993), VIII Definitions, C.2., <http://www.xenu.net/archive/IRS/>.

<sup>88</sup> L. Ron Hubbard Library, "The Bridge to Total Freedom [Chart]," 1998.

<sup>89</sup> L. Ron Hubbard, *Clear Body Clear Mind: The Effective Purification Program* (Copenhagen: New Era Publications, 1990), 242.

<sup>90</sup> Department of Treasury, 1993: VIII Definitions, C.4.

<sup>91</sup> Internal Revenue Service, Return of Organization Exempt From Income Tax, 2015, Narconon Pacific Coast," accessed June 4, 2017, downloaded from: [http://990s.foundationcenter.org/990\\_pdf\\_archive/463/463559503/463559503\\_201512\\_990.pdf](http://990s.foundationcenter.org/990_pdf_archive/463/463559503/463559503_201512_990.pdf).

<sup>92</sup> Internal Revenue Service, Return of Organization Exempt From Income Tax, 2015, Narconon of Oklahoma, Inc., downloaded from: [http://990s.foundationcenter.org/990\\_pdf\\_archive/731/731589280/731589280\\_201512\\_990.pdf](http://990s.foundationcenter.org/990_pdf_archive/731/731589280/731589280_201512_990.pdf) on June 4, 2017.

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<sup>96</sup> David Graham, “New Flint Firm: Health Service or Scientology Recruiting Arm?” *Flint Journal* [Flint, Michigan], February 6, 1983.

<sup>97</sup> *Ibid.*, A4.

<sup>98</sup> L. Ron Hubbard [Based on the Works of], *The Scientology Handbook* (Los Angeles: Bridge Publications 1994), 295.

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<sup>100</sup> State of Oklahoma Board of Mental Health, “Findings of Fact Regarding the Narconon-Chilocco Application for Certification,” December 3, 1991, 2-3, <http://www.xenu.net/archive/oca/narconon/91report.html>.

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<sup>103</sup> Hubbard, “The Purification Rundown,” 10.

<sup>104</sup> University of Maryland Medical Center, 3-4.

<sup>105</sup> Manca, “Alternative Therapy,” 14.

<sup>106</sup> L. Ron Hubbard [Assisted by PAC Sauna Construction Project], “How to Build a Sauna,” *Hubbard Communications Office Bulletin*, December 30, 1979, in L. Ron Hubbard, *The Organization Executive Course*, Volume 4 (Los Angeles, Bridge Publications, 1991), 1224.

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<sup>109</sup> Satoshi Iwase et al., “Effects of Dry Mist Saunas on Circulatory and Thermoregulatory Functions in Humans,” *Health* 5, 2 (2013): 272.

<sup>110</sup> W. Pilch et al., “Comparison of Physiological Reactions and Physiological Strain in Healthy Men Under Heat Stress in Dry and Steam Heat Saunas,” *Biology of Sport* 31, 2 (2014): 148.

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<sup>113</sup> Brandon P. Brown, *Magill’s Medical Guide*, 6<sup>th</sup> ed. (Massachusetts: Salem Press, 2010), s.v. “Hyperthermia and Hypothermia.”

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<sup>117</sup> See Atack, *A Piece of Blue Sky*, 351-353.

<sup>118</sup> See Church of Scientology International, *What is Scientology*, 289.

<sup>119</sup> Ben Goldacre, “Medical Hypotheses Fails the Aids Test,” *The Guardian*, September 12, 2009.

<sup>120</sup> David W. Schna (United States Environmental Protection Agency, Washington, D.C.) to Masanori Kuratsune (Dean, Nakamura Gakuen College), 2 May 1988.

<sup>121</sup> L. Ron Hubbard, *Science of Survival: Simplified, Faster, Dianetics Techniques* (Wichita, Kansas: The Hubbard Dianetic Foundation, 1951), I 98.

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<sup>146</sup> Kelly Preston, quoted in *PRWeb*, “Narconon Center Opens on Awe-Inspiring Mountain Peak Atop Majestic Ojai, California,” September 14, 2015, 1.

<sup>147</sup> Jen Heger, “Church of Scientology Paid Lobbyist \$590k from 2005-2012,” *Radar Online*, July 11, 2012.

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<sup>168</sup> National Association of Forensic Counselors, Inc., et al. v. Narconon International, et al., Case No. 14-ev-00187-KEW (United States District Court, Eastern District of Oklahoma, May 16, 2014), 44 pp.

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Appendix: Daily Vitamin Dosages								
Vitamin name	Narconon dosage <sup>C</sup>	United States <sup>A</sup>			Canada <sup>B</sup>			Effects from high levels <sup>G</sup>
		Group <sup>D</sup>	RDA <sup>E,K</sup>	Upper Limit <sup>F</sup>	Group	RDA	Upper Limit	
A	5000 IU <sup>H</sup>	Males 14-18 years > 18 years Females 14-18 years > 18 years	900 µg/d <sup>I</sup> 900 µg/d 700 µg/d 700 µg/d	2,800 µg/d 3,000 µg/d 2,800 µg/d 3,000 µg/d	Males 14-18 years > 18 years Females 14-18 years > 18 years	3000 IU/d 3000 IU/d 2333 IU/d 2333 IU/d	9333 IU/d <sup>K</sup> 10000 IU/d 9333 IU/d 10000 IU/d	“Teratological effects, liver toxicity.” “Individuals with high alcohol intake, preexisting liver disease, hyperlipidemia or severe protein malnutrition may be distinctly susceptible to the adverse effects of excess preformed vitamin A intake.”
B1 (thiamin, aneurin)	250-500 mg	Males 14-18 years > 18 years Females 14-18 years > 18 years	1.2 mg/d 1.2 mg/d 1.0 mg/d 1.1 mg/d	ND <sup>J</sup>	Males 14-18 years > 18 years Females 14-18 years > 18 years	1.2 mg/d 1.2 mg/d 1.0 mg/d 1.1 mg/d	ND	None reported
C (Ascorbic Acid/Dehydroascorbic Acid)	250-1000 mg	Males 14-18 years > 18 years Females 14-18 years > 18 years	75 mg/d 90 mg/d 65 mg/d 75 mg/d	1,800 mg/d 2,000 mg/d 1,800 mg/d 2,000 mg/d	Males 14-18 years > 18 years Females 14-18 years > 18 years	75 mg/d 90 mg/d 65 mg/d 75 mg/d	1,800 mg/d 2,000 mg/d 1,800 mg/d 2,000 mg/d	“Gastrointestinal disturbances, kidney stones, excess iron absorption.”
D (Calciferol)	400 IU	Males 14-18 years 18-70 years >70 years Females 14-18 years 18-70 years >70 years	600 IU/d 600 IU/d 800 IU/d 600 IU/d 600 IU/d 800IU/d	4,000 IU/d 4,000 IU/d 4,000 IU/d 4,000 IU/d 4,000IU/d	Males 14-18 years 18-70 years >70 years Females 14-18 years 18-70 years >70 years	600 IU/d 600 IU/d 800IU/d 600 IU/d 600 IU/d 800IU.d	4,000 IU/d 4,000 IU/d 4,000 IU/d 4,000 IU/d 4,000IU/d	“Hypercalcemia which can lead to decreased renal function and hypercalciuria, kidney failure, cardiovascular system failure, and calcification of soft tissues.”
E (α-Tocopherol)	800 IU (~550mg)	Males 14-18 years > 18 years Females 14-18 years > 18 years	15 mg/d 15 mg/d 15 mg/d 15 mg/d	800 mg/d 1,000 mg/d 800 mg/d 1,000 mg/d	Males 14-18 years > 18 years Females 14-18 years > 18 years	15 mg/d 15 mg/d 15 mg/d 15 mg/d	800 mg/d 1,000 mg/d 800 mg/d 1,000 mg/d	“Adverse effects from vitamin E containing supplements may include hemorrhagic toxicity. The UL for vitamin E applies to any form of α-tocopherol obtained from supplements, fortified foods, or a combination of the two.”
Niacin	100 mg	Males 14-18 years > 18 years Females 14-18 years > 18 years	16 mg/d 16 mg/d 14 mg/d 14 mg/d	30 mg/d 35 mg/d 30 mg/d 35 mg/d	Males 14-18 years > 18 years Females 14-18 years > 18 years	16 mg/d 16 mg/d 14 mg/d 14 mg/d	30 mg/d 35 mg/d 30 mg/d 35 mg/d	“Adverse effects from niacin containing supplements may include flushing and gastrointestinal distress.”

**Notes:**

- A. American data is from “Dietary Reference Intakes (DRIs): Vitamins,” Food and Nutrition Board, Institute of Medicine, National Academies, [http://www.nationalacademies.org/hmd/~media/Files/Activity%20Files/Nutrition/DRI-Tables/7\\_%20Nutrients%20Summary.pdf?la=en](http://www.nationalacademies.org/hmd/~media/Files/Activity%20Files/Nutrition/DRI-Tables/7_%20Nutrients%20Summary.pdf?la=en).
- B. Canadian data was produced in conjunction with the U.S. values and are available in “Food and Nutrition: Dietary Reference Intakes-Reference values for Vitamins,” Health Canada, [http://www.hc-sc.gc.ca/fn-an/nutrition/reference/table/ref\\_vitam\\_tbl-eng.php](http://www.hc-sc.gc.ca/fn-an/nutrition/reference/table/ref_vitam_tbl-eng.php).
- C. Narconon dosage is based on the original amounts provided in: “The Purification Rundown Replaces the Sweat Program,” Hubbard Communications Office Bulletin (February 6, 1978, RA; revised March 16, 1978; re-revised December 4, 1979): 19 pp.
- D. Defined as “Life-Stage Group” from the Daily Recommended Intakes reports from the Food and Nutrition Board.
- E. Recommended Dietary Allowances – recommended daily intake from food sources as well as supplements.
- F. Upper Limit is the maximum daily intake before there is a risk of adverse effects. The UL represents intake from food, water, and additional supplements.
- G. Effects from high levels are for occurrences of taking higher than the upper limits of nutrients. All adverse effects are quoted from the “Dietary Reference Intakes (DRIs): Vitamins” table.
- H. “An IU (International Unit) is a unit of measurement for vitamins and other specific biologically active substances. The precise measure of one IU differs from substance to substance and is established by international agreement for each substance.” [https://dietarysupplementdatabase.usda.nih.gov/ingredient\\_calculator/help.php](https://dietarysupplementdatabase.usda.nih.gov/ingredient_calculator/help.php). According to the Canadian Food Inspection Agency, “International Units (IU) were formerly used to express the vitamin A content of food.” <http://www.cfia-acia.agr.ca/food/labelling/food-labelling-for-industry/nutrition-labelling/elements-within-the-nutrition-facts-table/eng/1389206763218/1389206811747?chap=8>
- I. 1 IU is the biological equivalent of 0.3 µg retinol. Generally, now Vitamin A content (which is measured as a combination of retinal and beta-carotene) is expressed in retinol form <http://www.cfia-acia.agr.ca/food/labelling/food-labelling-for-industry/nutrition-labelling/elements-within-the-nutrition-facts-label-eng/1389206763218/1389206811747?chap=8>
- J. ND – “Not determinable due to lack of data of adverse effects in this age group and concern with regard to lack of ability to handle excess amounts. Source of intake should be from food only to prevent high levels of intake.”
- K. Vitamin A is reported both in µg (micrograms) and International Units. Because the Canadian data was produced in collaboration with the Food and Nutrition Board of the National Academy of Sciences in the United States, these amounts are considered to be equivalent.

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