

DRAFT: THE ETERNAL COMMITMENT: SCIENTOLOGY'S BILLION-YEAR CONTRACT

Phil Lord¹

This paper analyses the billion-year contract, a fundamental instrument in the Scientology religion. This contract is signed solely by members of Scientology's most senior order, the Sea Organisation, after they have proven their unqualified allegiance to the Organisation. This paper provides an overview of the Sea Organisation and of the onerous process which leads to it. It, then, undertakes an analysis of the billion-year contract and its fundamental role in defining and strengthening the commitment which binds the members to their organisation. It concludes that the billion-year contract is, contrary to what the Church suggests, far more than a "symbolic" commitment – it is, at once, a rebellious, visionary, and constitutive act.

¹ LL.B. (McGill) B.C.L. (McGill), Partner, Vezno Capital.

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INTRODUCTION²

Before there was a religion, there was commitment. And before there was a commitment, there was a contract. This seemingly circular proposition highlights the fundamentality of the billion-year contract to the members of the Scientology religion. If the commitment precedes the religion, how can the religious contract precede the commitment? For the proposition to be accurate, we must think of Scientology followers as forming two distinct groups – the members who were a part of the religion in the years preceding and directly following its founding, and those who joined it after it was founded. Founded some seventy years ago,³ Scientology stands out, even among new religious movements, as a very recent religion.⁴ The first group

² This paper builds upon a paper I recently wrote, which provides a broad overview of Scientology's legal system (Phil Lord, "Scientology's Legal System" (2018) McGill University Faculty of Law Working Paper, online: SSRN <<https://ssrn.com/abstract=3232113>> .) The paper is under review by an academic journal, and I will reference it from time to time. In conducting research on Scientology over the past 2 years, I have interacted with several Scientologists. I met Scientologists at the Montreal and Los Angeles churches, all of whom have been gracious and helpful. I have also been in contact with a member of the Sea Organisation (Scientology's most senior order), with whom I had many conversations. To protect her anonymity, I do not reveal her name. She has been exceedingly generous with her time, and I thank her.

³ James R Lewis, *Scientology* (Oxford: Oxford University Press, 2009) at 21-23. The movement does not have a defined founding date. It is rooted in the bestseller published by the religion's founder, L. Ron Hubbard, in 1950, *Dianetics: The Modern Science of Mental Health* (revised ed (Los Angeles: Bridge, 2007)). Hubbard initially intended the book to be a treatise on mental health. Hubbard and his associates sought to have its contents published in the *Journal of the American Medical Association* and the *American Journal of Psychiatry* (see e.g. Russel Miller, *Bare-Faced Messiah: The True Story of L. Ron Hubbard* (Toronto: Key Porter, 1987) at 151). The mental health community rebuked Hubbard. The key concepts of Dianetics later morphed into Scientology. The Dianetics foundation declared bankruptcy after being sued for illegal practice of medicine (see e.g. Ronald B Flowers, *Religion in Strange Times: The 1960s and 1970s* (Macon: Mercer University Press, 1984) at 96–97). In 1952, Hubbard published *Scientology, A Religious Philosophy* (Christian D von Dehsen, ed, *Lives & Legacies: An Encyclopedia of People Who Changed the World: Philosophers and Religious Leaders* (Phoenix: Oryx, 1999) at 90) – the book appears to have been republished as *Scientology: The Fundamentals of Thought* (L Ron Hubbard (revised ed (Los Angeles: Bridge, 2007)). In 1953, Hubbard incorporated the first three churches of Scientology (Miller, *ibid* at 140–142).

⁴ Other new religious movements, such as Jehovah's Witnesses and The Church of Jesus Christ of Latter-day Saints, were founded hundreds of years before Scientology (Andrew Holden, *Jehovah's Witnesses: Portrait of a Contemporary Religious Movement* (New York: Routledge, 2002) at 1; Casey Paul Griffiths, Scott C Esplin & E Vance Randall, "The Glory of God Is Intelligence": Exploring the Foundations of Latter-day Saint Religious Education" (2016) 111:2 *Religious Education* 153 at 155). All three religions are called new religious movements or new religions as their age is compared to that of mainstream religions, such as the Abrahamic religions, whose founding dates back

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joined the religion while its founder, L. Ron Hubbard, was alive – when the religion was being defined.⁵ As will be explained later on, the billion-year contract is only presented to Scientology's most dedicated, full-time members: members of the Sea Organisation. Scientologists who signed the contract when Hubbard was alive are, therefore, likely to have interacted with Hubbard himself. These members, and their commitment to Hubbard and his nascent philosophy, helped define and strengthen religious Scientology. The members of the second group, on the other hand, joined Scientology in the post-Hubbard era. These members had and have a far different relationship to the religion. They adhere(d) to an existing religion, with little hope of shaping it. Scientology is indeed a peculiarly unchanging religion. Every relevant rule and doctrine is in writing, with Scientology founder L. Ron Hubbard as their only "source."⁶ There is no mechanism for or acceptability of altering the body of knowledge which Hubbard developed. Neither are there mechanisms to change the interpretation of Hubbard's works.⁷ The commitment of more recent members is also shaped by the billion-year contract. These members join the Sea Organisation with a complete understanding of their eternal commitment to the religion. The contract

thousands of years ("What Are the Abrahamic Religions?: Christianity, Islam, and Judaism Are Regarded as the Largest Abrahamic Religions by the Number of Adherents", *World Atlas*, online: <<https://www.worldatlas.com/articles/what-are-the-abrahamic-religions.html>> .)

⁵ Hubbard lived from 1911 to 1986 ("L. Ron Hubbard", *Encyclopaedia Britannica*, online: <<https://www.britannica.com/biography/L-Ron-Hubbard>> .)

⁶ See Lord, *supra* note **Error! Bookmark not defined.** at 21 and Rothstein, "Scientology, Scripture and Sacred Traditions" in James R Lewis & Olav Hammer, eds, *The Invention of Sacred Tradition* (Cambridge: Cambridge University Press, 2007) 18 at 24.

⁷ In my first paper on Scientology (Lord, *supra* note 2 at 25, I give the counter-example of Islam, a much older religion, whose law was modernised through judicial decisions and modern statutes, see e.g. Ann Elizabeth Mayer, "Law: Modern Legal Reform" in John L Esposito, ed, *The Oxford Encyclopedia of the Islamic World* (Oxford: Oxford University Press, 2009), online: <<http://www.oxfordislamicstudies.com/article/opr/t236/e0473>> , which states:

Reforms affecting Islamic law in the nineteenth and twentieth centuries were more far-reaching than any undertaken previously. The impetus for reform came both from within the Islamic tradition, as specialists in Islamic law sought to reform laws in the face of changing attitudes and social needs, and from without, as political leaders imposed changes designed to eliminate archaic features that impeded governmental modernization programs.

Scientology's main rule enforcement mechanism, the Committee of Evidence, does not allow for the interpretation of Scientology rules. Its role is generally confined to reviewing evidence and applying a rule to the evidence (see Lord, *supra* note 2 at 25–26). There is no jurisprudence in the religion of Scientology, and past decisions have no bearing on future decisions.

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precedes their commitment. It shapes, strengthens, and confirms their commitment.

This paper will analyse the billion-year contract and its use in the religion of Scientology. Section I will offer a description of the billion-year contract and of the Sea Organisation. Section II will attempt to provide a framework through which we can think about the billion-year contract. It will analyse the nature of contracts and of the commitment which the billion-year contract regulates. It will also draw comparisons to other religious legal and quasi-legal instruments.

I. THE SEA ORGANISATION AND ITS BILLION-YEAR CONTRACT

It is worth first reproducing in full the billion-year contract. Although the version reproduced below is technically unsourced, hundreds of pictures of the billion-year contract have been disclosed on the web over the past decades. I reproduce here the version from the memoir of a former Scientologist, which is the same as a that disclosed widely on the web. Flag Order 232, mentioned in the contract, does not set out the contract itself. The contract reads as follows:

SEA ORGANIZATION

Contract of Employment

I,.....

DO HEREBY AGREE to enter into employment with the SEA ORGANIZATION and, being of sound mind, do fully realize and agree to abide by its purpose which is to get ETHICS IN on this PLANET AND THE UNIVERSE and, fully and without reservation, subscribe to the discipline, mores and conditions of this group and pledge to abide by them.

THEREFORE, I CONTRACT MYSELF TO THE SEA ORGANIZATION FOR THE NEXT BILLION YEARS.
(As per Flag Order 232)

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Date Signed

Date Witness

Date Witness

Have the Sea Org Recruiter perform the Sea Org Swearing In Ceremony.

Your Signature

Recruiters Signature⁸

The contract has generated significant media attention in recent years.⁹ This attention is part of a broader public fascination with the religion of Scientology, a fascination which culminated in a widely-watched television show, *Leah Remini: Scientology and the Aftermath*. The show has run on national television in the United States since 2016.¹⁰ Scientology has, indeed, garnered a great deal of attention in recent years, and its behaviour

⁸ Nancy Many, *My Billion-Year Contract: Memoir of a Former Scientologist* (Pennsauken, NJ: BookBaby, 2009). This book is self-published. The pages are not numbered.

⁹ See e.g, Jamie Lee Curtis Taete, "The Beach Party for Former Religious Fundamentalists" (28 June 2018), *Vice News*, online: <https://www.vice.com/en_ca/article/mbkg3y/the-beach-party-for-former-religious-fundamentalists> ; Tom Sykes, "Battlefield: Inside Tom Cruise and John Travolta's Scientology Feud" (18 April 2018), *The Daily Beast*, online: <<https://www.thedailybeast.com/inside-tom-cruise-and-john-travoltas-scientology-feud>> ; Donna Freydkin, "Former Scientologist Shares His Story, Interactions with Tom Cruise" (27 June 2018), *Today*, online: <<https://www.today.com/news/former-scientologist-shares-his-story-interactions-tom-cruise-t131972>> .

¹⁰ The television show has run on A&E channel since 2016. It seeks to "giv[e] a voice to victims of the Church of Scientology despite public attempts to discredit them" ("Leah Remini: Scientology and the Aftermath: About", *A&E*, online: <<https://www.aetv.com/shows/leah-remini-scientology-and-the-aftermath/about>> .) The show notably covers physical abuses in the Sea Organisation, disconnection from friends and family members, and the handling of critics of the religion.

has been covered (and decried) in national outlets reaching millions of people, such as CNN¹¹ and A&E.¹²

In my first paper, I address the sources of rules in Scientology.¹³ While the public, introductory books, known as *The Basics*,¹⁴ contain some rules and information regarding enforcement mechanisms, the comprehensive set of rules and enforcement mechanisms is described in two, multi-thousand-page sets of volumes, known to Scientologists as the “red” (or “tech”) and “green” (or “admin”) volumes. The red volumes contain the technical bulletins of Dianetics and Scientology, known as Hubbard Communications Office Bulletins (“HCOBs”). They cover Scientology’s religious processes and practices. The green volumes cover the management system created by Hubbard, a system, which is used by managers of the organisation. It is described in Hubbard Communications Office Policy Letters (“HCO PLs”). Neither set of volumes seems to offer a description of the billion-year contract, which is highly unusual considering the volumes’ comprehensiveness.¹⁵

On its public website, the Church describes the contract as follow:

¹¹ CNN anchor Anderson Cooper hosted on his show *Anderson Cooper 360* former victims of the Church, as well as current Sea Organisation members. The five-part series was titled “Scientology: A History of Violence” and addressed allegations of physical abuse in the Sea Organisation. It covered in other outlets (see e.g. Joe Nocera, “Scientology’s Chilling Effect” (24 February 2015), *The New York Times*, online: <<https://www.nytimes.com/2015/02/24/opinion/joe-nocera-scientologys-chilling-effect.html>> and Gillian Grace, “Anderson Cooper to Scientology’s David Miscavige: ‘It’s On’” (28 March 2010), *The National Post*, online: <<https://nationalpost.com/news/anderson-cooper-to-scientologys-david-miscavige-its-on>> .)

¹² See *A&E*, *supra* note 10.

¹³ Lord, *supra* note 2 at 12–18.

¹⁴ See e.g. “The Basics”, *Bridge Publications*, online:

<<http://www.bridgepub.com/introduction/the-basics.html>> and “David Miscavige: Scientology Scripture Recovered and Restored in 25-Year Program Completed in 2009”, *Scientology*, online: <<https://www.scientology.org/david-miscavige/renaissance-for-scientology/completion-of-the-golden-age-of-knowledge.html>> . The “basics books and lectures” are a collection of 18 books and 280 lectures. They constitute Scientology scripture, but are not considered advanced scripture.

¹⁵ It may be worth speculating on the intentionality of the exclusion of information regarding the Sea Organisation and its operations from Scientology scripture. As mentioned, Scientology scripture is unusually comprehensive and encompasses many large volumes, which can lead one to believe that relatively fundamental information regarding the organisation can only be voluntarily excluded. The effect of excluding information on the Sea Organisation is to hide some aspects of it from even the most loyal public Scientologists, further drawing a divide between Sea Organisation members and public members.

The first Sea Organization members formulated a one-billion-year pledge to symbolize their eternal commitment to the religion and it is still signed by all members today. It is a symbolic document which, similar to vows of dedication in other faiths and orders, serves to signify an individual's eternal commitment to the goals, purposes and principles of the Scientology religion.¹⁶

I will address in the next sections the accuracy of the various claims made in this paragraph. It is not unusual for Scientology to make inaccurate claims about its practices and scriptures on its public websites.¹⁷

I previously mentioned that the billion-year contract is only signed by members of the Sea Organisation. The Sea Organisation is described on Scientology's website as follow:

The Sea Organization is a religious order for the Scientology religion and is composed of the singularly most dedicated Scientologists—individuals who have committed their lives to the volunteer service of their religion. The Sea Organization is a fraternal religious order and is not incorporated.

[. . .]

The Sea Organization was established in 1967 and once operated from a number of ships. It was formed to assist L. Ron Hubbard with advanced research operations and

¹⁶ “Is It True that People in the Sea Org Sign a Billion-Year Contract?”, *Scientology*, online: <<https://www.scientology.ca/faq/church-management/is-it-true-that-people-in-the-sea-org-sign-a-billion-year-contract.html>> .

¹⁷ There are countless examples of such inaccuracies. As an example, on its website, Scientology claims that one can be both a Scientologist and a member of another religion (see e.g. “Does Scientology Have a Concept of God?”, *Scientology*, online: <<https://www.scientology.ca/faq/scientology-beliefs/what-is-the-concept-of-god-in-scientology.html>>), which is simply inaccurate. Former Scientologists support this view (see e.g. “What Christians Need to Know about Scientology” (1991), Carnegie Mellon Scientology Archive, online: <<https://www.cs.cmu.edu/~dst/Library/Shelf/wakefield/christians.html>> and “Can Scientologists be Christians or Jews Too?” (31 December 2016), *Something Can Be Done About It: Mike Rinder's Blog*, online: <https://www.mikerindersblog.org/can-scientologists-be-christians-or-jews-too/> .) The Church also denies that it shuns (or even mandates disconnection from) former members (“What Is Disconnection?”, *Scientology*, online: <<https://www.scientology.ca/faq/scientology-attitudes-and-practices/what-is-disconnection.html>>), which is similarly inaccurate (see Roy Wallis, *The Road to Total Freedom: A Sociological Analysis of Scientology* (New York: Columbia University Press, 1977) at 144–45 and “Cancellation of Fair Game”, Hubbard Communications Office Policy Letter, 21 October 1968.)

supervise Church organizations around the world. The Sea Organization is entrusted to minister the advanced services of Scientology.

The Sea Organization retains its traditional name, although today the majority of its members are based on land. In keeping with the tradition of the order's inception, however, they still wear maritime-style uniforms and have ranks and ratings.

The Sea Organization Motor Vessel Freewinds is entirely staffed by members of the Sea Organization. Utilizing the training materials developed by L. Ron Hubbard in the early days of the Sea Organization, the Freewinds has the best safety and service record of any ship in the Caribbean.

As volunteers and members of a religious order, Sea Organization members work long hours and live communally with housing, meals, uniforms, medical and dental care, transport and all expenses associated with their duties provided by the Church. They also receive an allowance to purchase personal items, as all of their other expenses are fully covered by the Church.

Sea Organization members participate in Scientology training and auditing during a portion of each day, but otherwise dedicate themselves to furthering the objectives of Scientology through their particular functions.

Positions in the Sea Organization are analogous to that of members of religious orders in other religions.

[. . .]

Today, some five thousand members of the Sea Organization hold staff positions in upper-level Scientology Church organizations around the world, ensuring the religion is available to the millions of Scientology parishioners who live and work outside the Church.¹⁸

¹⁸ "What Is the Sea Organization?", *Scientology*, online: <<https://www.scientology.ca/faq/church-management/is-it-true-that-people-in-the-sea-org-sign-a-billion-year-contract.html>> .

This description is mostly accurate – although the number of Scientologists worldwide is in the tens of thousands rather than in the millions.¹⁹ The Sea Organisation is fully distinct from the general population of public Scientologists. As stated, Sea Organisation members dedicate themselves full-time to the religion. More importantly, what is expected of Sea Organisation members vastly differs from what is expected of public Scientologists. While public Scientologists may be considered in good standing even if they do not dedicate hours per day or week to the study of Scientology,²⁰ Sea Organisation members are expected to study Scientology scripture for several hours every day. Their access to confidential information regarding the organisation is, as a result of their unique commitment and greater involvement, more significant. Sea Organisation members have access to membership figures and to the confidential records of individual public members. They are also involved in the management of the organisation. It is worth noting that the Sea Organisation now constitutes a very significant part of the total number of Scientologists worldwide. As the number of public Scientologists has declined at a faster rate than the number of Sea Organisation members, Sea Organisation members have come to constitute a disproportionately large portion of the total number of Scientologists.²¹

¹⁹ Scientology claims membership in the millions (Elaine Jarvik, “Scientology: Church Now Claims More than 8 Million Members” (20 September 2004), *Deseret Morning News*, online:

<<https://web.archive.org/web/20080616032022/http://deseretnews.com/dn/view/0%2C1249%2C595091823%2C00.html>> .) This claim is unfounded. Independent sources suggest there are fewer than 100,000 Scientologists (see e.g. Jonny Jacobsen, “Counting Scientology: Reality Check: Independent Data Contradicts Scientology’s Membership Claims” (9 February 2017), *Medium*, online: <<https://medium.com/how-many-scientologists-are-there-really/5-factoring-in-reality-3f0bb2d4e4cf>> (the latest United States census found approximately 55,000 Scientologists)).

²⁰ The expectations regarding time dedication are not made public. It is, however, not unusual for public Scientologists to be expected to dedicate at least 10 hours per week to the religion (“How Does the Day-to-Day of Being A Scientologist Compare to Other Religions” (18 December 2017), *Scientology Parents: Applying Scientology to Parenting with Results*, online: <<http://www.scientologyparent.com/how-does-the-day-to-day-of-being-a-scientologist-compare-to-other-religions/>> and Chris Jancelewicz, “Leah Remini Reveals What Happens When You Reach the Top of Scientology”, *Global News* (6 September 2017), online: <<https://globalnews.ca/news/3721663/leah-remini-scientology-bridge-total-freedom/>> .)

²¹ There are no hard figures regarding this decline in membership. The Church does not release official figures on the number of Scientologists. However, sources from inside the Church have stated that the membership has been in decline for decades (see e.g. “‘Scientology Is Dying’: John Brousseau on the Decline of Int Base and Fate of Shelly Miscavige”, *The Underground Bunker*, online: <<https://tonyortega.org/2017/11/11/scientology-is-dying-john-brousseau-on-the-decline-of->

Although the Sea Organisation is, as mentioned previously, fully distinct from the general population of Scientologists, it is not unusual for public Scientologists to transition into the Sea Organisation. The retention rate for children born into the Sea Organisation (to members of the Organisation) is high, and many Sea Organisation members were born and educated in the Sea Organisation.²² This process is onerous and secretive.

int-base-and-fate-of-shelly-miscavige/> .) Dr. Stephen Kent, a prominent academic who has extensively studied Scientology, supports this view (Geoff McMaster, "Once Thriving Church of Scientology Faces Extinction" (10 January 2018), *University of Alberta: Faculty News*, online: <<https://www.ualberta.ca/arts/faculty-news/2018/january/once-thriving-church-of-scientology-faces-extinction>> .

²² There have, unsurprisingly, been no empirical studies of children in the Sea Organisation. There are, however, countless children who grew up in the Sea Organisation and have provided testimonies regarding their upbringing, see e.g. "Growing Up in Scientology", online: *YouTube* <https://www.youtube.com/channel/UCD8AAvA3_JDFeOps-HzPPHg> and Abigail Pesta, "Scientology's Sea Org: An Escape Story for Katie Holmes and Suri Cruise", *The Daily Beast* (6 July 2012), online: <<https://www.thedailybeast.com/scientologys-sea-org-an-escape-story-for-katie-holmes-and-suri-cruise>> . Scientology's public website states:

The Sea Organization is a relatively new religious order[.] [. . .] After ten years of experience with children, by 1986 it had become apparent that the duties of a member of the Sea Organization were not compatible with raising children. For example, a Sea Organization member must be free to travel on short notice and sometimes for extended periods, which is not easily balanced with parenting young children.

Hence, in 1986 the policy was established that Sea Organization members desiring children would be granted a leave of absence from the Order until their children reached majority. In this respect, the Sea Organization is no different than other religious orders.

[. . .]

For Sea Organization members who had children before the policy of the religious order changed in 1986, school facilities were built to properly educate and provide for the children. By way of example, for several years the Church of Scientology International operated private boarding schools for the children of Sea Organization members in Riverside and Los Angeles counties. The Sea Organization similarly provided schooling for the children of Sea Organization members in Florida and New York, as well as at Sea Organization facilities outside the United States. Each child who attended these schools was sent there at the specific request of his or her parents.

Today, if an individual with minor-age children wishes to join the Sea Organization, the children must qualify for the Sea Organization and wish to join on their own determinism. The minimum age of Sea Organization members is generally the minimum age in any state or country that a person is legally permitted to work. The Church of

Public members go through a transition and testing period before they are allowed to join the Organisation. This period is only cursorily addressed in primary Scientology sources. Dr. Stephen Kent has elegantly analysed the evolution of this training program in Scientology sources. Space constraints prevent from providing a close analysis of all relevant primary Scientology sources. I, therefore, reproduce Dr. Kent's analysis, which reads as follows:

Certainly by early 1969, Hubbard had in place two training projects – the Deck Project Force (DPF) and the Pursers Project Force (PPF), but he abolished them on March 25, 1969. Apparently the DPF had trained Sea Org members on various ship duties, and the PPF presumably trained people in areas of ship finance and supply. Likewise, some time before early April, 1972, Hubbard had a training program for household services called the Stewards Project Force. He also had a program called the Estates Project Force (EPF), which (as we must reconstruct from a later document), did such work as painting and sweeping. Until the advent of the RPF, the EPF also received Sea Org members for (what Scientology called) “retreading.” These staff needed constant supervision, were making obvious problems, or were performing their jobs without enthusiasm.

Apparently, however, Hubbard reinstated the DPF, because by early 1972 it had a function beyond mere training. In addition to new recruits, the DPF received Sea Org members who were questioning authority. In the peculiar logic and language of Scientology, these people had “interiorized.” That is to say, “the person is finding counter-intention in the environment which coincides with his own (this is reasonableness), and his attention becomes directed to his own counter-intention rather than to his objective.” Said plainly, these people were questioning aspects of Sea Org life, and were finding things in the external world to reinforce their internal doubts. Consequently, the DPF was “to rehabilitate and exteriorize their attention” by getting them to do work assignments. Again said plainly, the intent of the program was

Scientology adheres to all child labor laws and no underage Sea Organization members are permitted to perform tasks or to work hours longer than permitted by law. (“Frequently Asked Questions: Are Young Children Permitted in the Sea Organisation?”, *Scientology*, online: <<https://www.scientology.ca/faq/scientology-in-society/are-young-children-permitted-in-the-sea-org.html>> .)

to get a person to stop looking inward and (re)learn to accept the orders that the organization and its leaders demanded.

With this goal in mind, Hubbard imposed a system of rewards and punishments called "ethics" on people within the DPF that paralleled the system under which ordinary Sea Org members operated. Overseeing DPF ethics was a person who had the title, the "Deck Project Force Master-At-Arms [DPF MAA]," and he or she was responsible for making "ethics real to DPF members by removing counter-intention and other-intention from the area, and by getting each DPF member to crank out products with an honest uptrending statistic." In other words, the MAA was to remove any ideas that were out of alignment with Scientology's goals through the use of the reward-and-punishment "ethics" system. Lateness, poor work performance, negative attitude, etc., were "out-ethics" actions that warranted the MAA to assign the offender to a lower ethics condition, which involved penalties on a gradient scale of severity. [. . .] In the DPF MAA's ethics assignments we can hear the echo of Hubbard's ideas about brainwashing, which he first discussed in 1955 and elaborated upon in the late 1960s. This staff member was to physically wear down people when trying to get them to renounce their private doubts, with the goal of getting them to completely embrace the collective goals of the organization.

Apparently the DPF's regime of hard work in harsh conditions continued into the early 1980s, since the account of Birgitta Dagnell about her time on the DPF in Denmark bears remarkable similarities to RPF accounts. According to her own statement, she was among the eighty-two former Guardian Office members sent into the Danish DPF by the new leadership of the Office of Special Affairs in 1982. The crowded conditions, the poor food, the exhausting hours, the assignments involving "cleaning toilets, corridors[,] and hotel rooms[,] or some painting and construction work" were the same for RPF inmates in other parts of the world. So were the "gang-bang sec checks" and the demand the "we 'recognized' that we really [were] that bad and evil," which she

experienced during what she thought were going to be auditing sessions.²³

These programs seemingly gradually morphed into two separate yet similar programs, the Estates Project Force (EPF), which serves to train and discipline new Sea Organisation members, and the Rehabilitation Project Force (RPF), which disciplines and punishes existing Sea Organisation members. I have described the RPF as a correctional facility within Scientology's legal system.²⁴ The RPF and, more specifically, one of its sites named *The Hole*²⁵ have generated significant interest in recent years and have been described in terms similar to those found above.²⁶ The phrase refers to the practice of making members engage in manual labour while studying the works of L. Ron Hubbard. This institution was devised by Hubbard circa 1969. Hubbard was then at sea on a Church-owned ship, surrounded by loyal followers and managing the organisation. The early version of the Rehabilitation Project Force involved "specific recommendations which if followed [would] rehabilitate the individual as a highly effective and worthwhile Sea Org member."²⁷ He describes it as follows:

²³ Stephen A Kent, "Brainwashing in Scientology's Rehabilitation Project Force (RPF)" (Paper delivered at the Presentation at the Society for the Scientific Study of Religion, San Diego, California November 7, 1997, online: <<https://skent.ualberta.ca/contributions/scientology/brainwashing-in-scientology-rehabilitation-project-force-rpf/>> . On Scientology's ethics system and other terminology, see generally Lord, *supra* note 2 and L Ron Hubbard, *Introduction to Scientology Ethics*, revised ed (Los Angeles: Bridge, 2007).

²⁴ Lord, *supra* note 2 at 26-28.

²⁵ *The Hole* is a Scientology facility located at Scientology's Gold Base, the estate where many members of the Sea Organisation live and (see e.g. Janet Reitman, *Inside Scientology: The Story of America's Most Secretive Religion* (Boston: Houghton Mifflin Harcourt, 2011) at 339)

²⁶ Debbie Cook a prominent member of the Sea Organisation left the religion in 2011 by mass-sending an email criticising the Church. Scientology sued Cook and later settled out of court. Cook nonetheless testified in the case. A section of the hearing can be accessed on YouTube ("Church of Scientology Flag Service Organization vs Debbie Cook" (14 September 2013), online: <<https://www.youtube.com/watch?v=AqTp-szDdeU>> .) Cook's email can be accessed on unofficial blogs (see e.g. "Debbie Cook's Email" (5 March 2013), *Scientology Cult*: "A Time Comes When Silence is Betrayal", online: <<http://www.scientology-cult.com/debbie-cooks-email.html>> .) The case is *Church of Scientology International v Debbie Cook*. See also "Scientology Defectors Describe Violence, Humiliation in 'The Hole'" (12 January 2013), online: <<http://www.tampabay.com/news/scientology/scientology-defectors-describe-violence-humiliation-in-the-hole/1270047>> .

²⁷ L Ron Hubbard, "Rehabilitation Unit", Flag Order 1848, 3 March 1969. A flag order is a binding document written by L. Ron Hubbard, similar to a policy letter.

[T]he unit is worked hard during the day on a rigorous schedule on jobs assigned by the Review Chief handling corrective areas and jobs needing remedy and repair. The Unit itself is thus made into an effective ship's review team. It works on a one job, one time, one place formula completing each job before moving into the next. Each individual thus earns the right to the remedial services he or she will receive [referring to religious services].²⁸

This section has provided an overview of the Sea Organisation and of the billion-year contract. The next section will attempt to provide a framework through which we can think about the billion-year contract. It will analyse the nature of contracts and of the commitment which the billion-year contract regulates. It will also draw some comparisons to other religious legal and quasi-legal instruments.

II. THINKING ABOUT THE BILLION-YEAR CONTRACT

This section will seek to establish how we ought to think about the billion year-contract. It will suggest that the billion-year contract is both much more and much less than it appears.

I will address later in this section the labelling of the billion-year contract as a *contract*. This taxonomy must be analysed, as the word contract carries with it a legal meaning, which is likely misused. I first address, however, how the billion-year contract can be thought of as a contract-like instrument. Legal definitions of the contract have focussed on its functional characteristics. The civilian law student, when prompted with the phrase “a contract is” will almost mechanically respond:

A contract is an agreement of wills by which one or several persons obligate themselves to one or several other persons to perform a prestation.

Contracts may be divided into contracts of adhesion and contracts by mutual agreement, synallagmatic and unilateral contracts, onerous and gratuitous contracts, commutative and aleatory contracts, and contracts of instantaneous performance or of successive performance; they may also be consumer contracts.

Similarly, in the common law case of *Rose & Frank Co v JR Crompton & Bros Ltd*,²⁹ we are told that:

²⁸ *Ibid.*

²⁹ [1923] 2 KB 261; [1925] AC 445.

To create a contract there must be a common intention of the parties to enter into legal obligations, mutually communicated expressly or impliedly. Such an intention ordinarily will be inferred when parties enter into an agreement which in other respects conforms to the rules of law as to the formation of contracts. It may be negatived impliedly by the nature of the agreed promise or promises, as in the case of offer and acceptance of hospitality, or of some agreements made in the course of family life between members of a family[.]

These functional definitions fail to ask more foundational questions about and understand the more foundational characteristics of contracts. Functional characteristics are, of course, very important to the majority of cases where the role of the judge is to determine whether a certain document constitutes a contract. To do so, the judge must know what the characteristics of a contract are and apply a multi-step test to detect its existence. When attempting to understand a non-traditional document which calls itself a contract, however, it more useful to ask ourselves *why* people enter into contracts and what the contract represents in their lives and in society. Contracts, after all, are an important part of everyday life. A contract is a fundamental instrument, which we use to order our lives. By its fundamentality, it brings us back to even more foundational elements of the human experience, such as otherness, interaction, fear, and uncertainty. In a previous paper, I argued that children's literature is a fundamental source of law. I concluded as follows:

Law is, at its core, about *rules*. Rules guide our behaviour, to help us pursue and hopefully find happiness. They help us avoid mistakes and pain. They help order our lives and our social interactions. Rules are our way to interact with and comprehend others, the world we live in, and, ultimately, ourselves. They emerge from our very existence – from our interactions with our environment. Rules are about the foundational blocks of the human experience: otherness, agency, fear, pain, power, and many more. Perhaps rule-making ought to simply be called *existing*.³⁰

Much of the same be said about contracts. If law is about rules, contracts are about relationships. They are our way to organise our lives and our relationships. Contracts can be a recognition of a significant relationship. We seek to tell both each other and the world which surrounds us that a relationship is worthy of being recognised in writing and in an official form. Contracts also strengthen a relationship, giving it an official and *binding* nature. They give us certainty and alleviate our fear. We know that a failure

³⁰ Phil Lord, "Law and *Green Eggs and Ham*" (2018) McGill University Faculty of Law Working Paper, online: SSRN <<https://ssrn.com/abstract=3242951>> .

to uphold the relationship would be a breach of the contract – and carry some consequences. The contract is simultaneously a recognition of our fear, the fear that others will take advantage of our trust and deceive us, and an aid to alleviate this fear. Contracts, like laws, allow us to live our lives peacefully. We rarely pause to think about the mosaic of laws and contract which ensure that we are safe in all aspects of our lives, yet this mosaic is highly complex and not naturally occurring. It is this mosaic which allows us to dedicate ourselves to productive aims such as contributing to our community and finding happiness, rather than having to worry about our survival or about others taking advantage of our trust.

The billion-year contract is, therefore, first about a relationship. It is about the relationship which unites the Scientologist to her religion. As we explored in the previous section, only seasoned Scientologists are invited to join the Sea Organisation, and even these Scientologists need to undergo rigorous spiritual testing and training – some would, as we saw, call this testing indoctrination or even brainwashing³¹ – to prove and reaffirm their allegiance to the organisation. The relationship which the billion-year contract recognises is one of extreme loyalty, and it is one of great importance to the religion. The billion-year contract recognises the most dedicated Scientologists, those who are most crucial to the survival and growth of the religion. As mentioned in the previous paragraph, the recognition of a relationship through a contract is inextricably tied to its officialisation and its strengthening. Members who sign the contract are implicitly yet tangibly recognised as key members of the religion.³² This recognition, coupled with the training and preparation which preceded it, helps strengthen the members' commitment to the religion. The contract is a synallagmatic commitment where the members commits herself to the organisation, while the organisation recognises the member's importance to its flourishing.

We, of course, cannot think of the billion-year contract without mentioning its unique religious nature. The contract symbolises and strengthens a special type of commitment: one of a religious nature. While the interplay between law and religion has been widely studied, there seem

³¹ See Kent, *supra* note 23.

³² While the number of Sea Organisation members is a closely guarded figure and while Scientology may not keep records up-to-date records of Sea Organisation membership (that is, records excluding members who have defected or otherwise left the organisation), there appear to be some 5,000 Sea Organisation members. "What Is the Sea Organization?", *supra* note 18 used to list a number in that vicinity, but the mention was removed from the page several years ago. J. Gordon Melton, a religious scholar, suggests that there were some 7,000 members circa 2000 ("A Contemporary Ordered Religious Community" in Derrick Davis & Barry Hankins, eds, *New Religious Movements and Religious Liberty in America* (Waco, TX: Baylor University Press, 2003) 43.)

to be no contracts similar to the billion-year contract – contracts which unite a religious organisation to an unpaid clergy member. There are other types of contractual and quasi-contractual³³ relationships in religions. There are, for example, employment contracts which can unite paid employees and their religious organisation³⁴ and private contracts (between private parties) which regulate their relationship.³⁵ Scientology is, therefore, different. While members of other religions would most likely see their relationship to their religion as eternal (if they believe in eternal life and salvation through their religion), Scientology chooses to reinforce, recognise, and officialise this commitment by using what it calls a contract.

The billion-year contract is, needless to say, invalid within the mainstream³⁶ legal system. No thorough legal analysis is required to reach this conclusion. The contract purports to be an employment contract³⁷ with a term of one billion years, without any remuneration being provided. An

³³ I use this phrase to refer to misuses of the word “contract” as per its legal meaning. There are several situations where religions use the word contract to refer to a document which is invalid within the majority of mainstream legal systems. In these situations, using the word is arguably inappropriate. It could be argued that the meaning of the word is not “owned” by any particular legal system. This point is, however, of no relevance, as Scientology does not have its own definition of the word “contract” and the meaning of the word is generally consistent in across legal systems.

³⁴ Religious organisations are generally non-profit organisations. As non-profit organisations, they can, like corporation, have employees (for more on this point, see note 34, below).

³⁵ There are many examples of such contracts. One example is the religious marriage contract. These contracts can be valid within the mainstream legal system if they comply with the legal requirements regarding the formation and content of contracts, see e.g. Ghada G. Qaisi, “Religious Marriage Contracts: Judicial Enforcement of *Mahr* Agreements in American Courts” (2001) 15 *JL & Religion* 67.

³⁶ I use the phrase “mainstream legal system” to refer to the state legal system in jurisdictions where Scientology is present. For other authors using the phrase, see Marilyn Holly, “Navajo Criminal Justice: A Jungian Perspective” in Jeffrey Ian Ross & Larry Allen Gould, eds, *Native Americans and the Criminal Justice System* (Boulder: Paradigm, 2006) 17 at 28 and Estefanía Estévez, Marina Rachitskiyb & Carla Rodríguez, “Is Perception of the Mainstream Legal System Homogeneous Across Ethnic Groups?” (2013) 5:2 *European Journal of Psychology Applied to Legal Context* 155.

³⁷ See Many, *supra* note 8. In Quebec, employment contracts are regulated by the *Act respecting labour standards*, CQLR, c N-1.1. I use the example of Quebec to demonstrate some of the reasons why the billion-year contract is not a valid employment contract.

employment contract which provides for no remuneration is invalid.³⁸ A contract with such a long term is, similarly, invalid.³⁹

But to say that the billion-year contract is invalid within the mainstream legal is somewhat beside the point. Scientology has never argued that the contract is valid within the mainstream legal system,⁴⁰ and it has not sought to have a court of law enforce the contract. Scientology has its own legal system, which operates independently of the mainstream legal system.⁴¹ That is not, however, to say that Scientology's downplaying of the significance of the billion-year contract on its public websites is accurate.⁴² A former Sea Organisation members states:

In 1989 I left the Sea Org for personal reasons, following their standard "route out" procedure. I was told that I could return to the Sea Org at any time but would be required to go through some ethics procedures if/when that happened. I also understood that since I departed for my own reasons, not because I was required to leave by some church policy, that the covenant remained in effect and I still owe the Church of Scientology 999,999,998 years. They are not planning to come and collect me any time soon, but the obligation still stands, on my honor as a Scientologist in good standing.

And no, the billion years part was not a joke. It was a knowing commitment of your efforts for that period into the future.⁴³

³⁸ See e.g. *Act respecting labour standards, ibid*, s 40. While Scientology provides its Sea Org members with room and board, such benefits are of no relevance to the computation of the minimum wage, see e.g. *ibid*, s 41. This argument is only to show that the billion-year contract cannot be an employment contract. Since religions are almost always non-profit organisations, they can be the beneficiaries of hours volunteered by their members. That being said, while this point is beyond the scope of this paper, it is worth mentioning that the status of Scientology workers in Quebec is arguably illegal. One is either a volunteer or an employee (subject to minimum wage regulations). There cannot be *paid volunteers*.

³⁹ The maximum term of a contract depends on how it is categorised. It is generally limited to 100 years, see e.g. arts 1123, 1197, 1272, 1880, 2374 CCQ.

⁴⁰ See e.g. "Is It True that People in the Sea Org Sign a Billion-Year Contract?", *supra* note 16 ("It is a symbolic document which, similar to vows of dedication in other faiths and orders, serves to signify an individual's eternal commitment to the goals, purposes and principles of the Scientology religion.")

⁴¹ See generally Lord *supra* note 2.

⁴² See my comment about inaccurate information on public Scientology websites (and related sources) at note 16, above. See also the claim at note 37, above.

⁴³ Clifford Heseltine, "What Is the 'Billion Year Contract' in Scientology?" (17 April 2018), online: *Quora* <<https://www.quora.com/What-is-the-billion-year-contract-in-Scientology/answer/Clifford-Heseltine?ch=10&share=d1f664b6&srid=OBAm>> .

“Routing out” is a procedure (which I do not further described here) through which Scientologists can leave the organisation. Leaving the religion through approved mechanisms will generally protect a Scientologist from being labelled a “suppressive person” and being “disconnected” from by family members. The quotation makes clear that the billion-year contract is a very serious commitment. The commitment is not only as serious as a contract, it is arguably more serious than a contract. While one’s obligation under a contract is extinguished by a number of events including the failure by one party to perform their obligations,⁴⁴ one’s commitment under the billion-year contract is never extinguished. Just like in the mainstream legal system, breaching a contract has consequences. Scientologists can be disciplined through the enforcement mechanisms and correctional facilities described previously.⁴⁵ The potential consequences include the imposition of a freeloader bill, under which former members of the Sea Organisation are retroactively billed for the free services they received while they were in service.⁴⁶ The consequences are generally more serious than those within the mainstream legal system, as they also include excommunication. Excommunication is of much greater impact to the member than pecuniary consequences. The member feels like they are, notably, losing the right to eternal life.

This section has sought to provide a framework through which we can think about the billion-year contract. It has analysed the nature of contracts and of the commitment which the billion-year contract regulates. It has also drawn comparisons to other religious legal and quasi-legal instruments.

CONCLUSION

This paper has sought to provide an overview of and a framework through which to think about the billion-year contract used in the Scientology religion. It has sought to provide one more building block to an unfortunately nascent yet vital field of research at the intersection of religious studies and law, which one might term, as I previously have,⁴⁷ Scientological legal

⁴⁴ See e.g. arts 1591, 1671 CCQ.

⁴⁵ Also see generally Lord, *supra* note 2.

⁴⁶ See generally Stephen A Kent, "Scientology and the European Human Rights Debate: A Reply to Leisa Goodman, J. Gordon Melton, and the European Rehabilitation Project Force Study" (2003) 8:1 Marburg J Religion.

⁴⁷ See e.g. Lord, *supra* note 2 at 12. This terminology is consistent with the legal research involving other religions and religious movements, see e.g. John Witte, “Foreword: From Critical Legal Studies to Christian Legal Studies” in Robert Cochran & David VanDrunen, eds, *Law, and the Bible: Justice, Mercy and Legal Institutions* (Downers Grove, IL: InterVarsity Press, 2013) at 7 and Ayesha S. Chaudhry. “Islamic Legal Studies: A Critical

studies. As would be necessary for countless more aspects of the Scientology religion, this paper has paused to critically analyse a key aspect of the religion, which has recently generated significant interest – even fascination – from non-Scientologists.⁴⁸ The billion-year contract can be thought of as both as far less than an instrument which has deserved such media coverage, as a simple way for members of a religion to signify and deepen their commitment to their religion. Yet upon taking a closer look and albeit for a different set of reasons, we can think of it as far more than simply a contract. The billion-year contract can be thought of as an implicit yet significant affirmation of the legitimacy and independence of the legal system which exists within the Scientology religion. It can be thought of as rebellion of Scientology to the outside world and the legal system which regulates and defines it – a legal system which *legally* also regulates Scientology. The contract denies the primacy of the mainstream legal system. It appropriates a name from the traditional legal system to an instrument which challenges it.⁴⁹ These points can be thought of as fortuitous or intentional – or perhaps even as fortuitous yet greatly significant.

In the introduction, I stated: “Before there was a religion, there was commitment. And before there was a commitment, there was a contract.” The billion-year contract is a fundamental part of the Scientology religion, just as the Sea Organisation is a fundamental part of the Scientology religion. The billion-year contract defines and strengthens the commitment of the religion’s most dedicated members, just as it (the billion-year contract) originally was born as a result of great dedication. In many ways and perhaps even more so since Hubbard’s passing, the Sea Organisation is, to a large part, Scientology. Unlike in other religions, members of Church management do not shape Scientology scripture or its application.⁵¹ Yet still unlike in other religions, Church management is intimately involved in a large portion of Church affairs and operations.

Studying the billion-year contract is a microcosm for the many unique and universal issues one is bound to face when studying Scientology. How do we analyse aspects of a religion which are confidential or which arise from extremely obscure sources? How do we tie Scientology and its rules and

Historiography” in Anver M. Emon & Rumea Ahmed, eds, *The Oxford Handbook of Islamic Law* (Oxford: Oxford University Press, 2017) 1 at 1. The suffix “ical” does not imply a perspective which is favourable to or rooted in the religion being studied.

⁴⁸ See notes 11 and 12, above.

⁴⁹ See generally note 33, above.

⁵⁰ My personal opinion is that the magnitude and comprehensiveness of the materials which constitute Scientology’s legal system suggest that it is unlikely that the use of a word with such an obvious relationship to the mainstream legal system is unintentional.

⁵¹ See Lord, *supra* note **Error! Bookmark not defined.** at 21 and Mikael Rothstein, *supra* note 6 at 24.

procedures to existing frameworks where so little research has been conducted? How do we give a voice to the perspective of Scientologists in a fair and balanced way, especially when Scientologists have little interest in grooming their own scholars and establishing a field of research concerning Scientology *as a religion*? How do we earn and maintain the trust of Scientologists without sacrificing the integrity of our scholarly work? While these issues may make the field intimidating, neither courts nor scholars can abdicate their responsibility to contribute to public discourse regarding Scientology. The issues are too complex and their implications, too significant for a disinterested perspective to be absent. Studying religions helps us understand religious individuals, whose religion is an intimate and central part of their lives. As we understand these individuals and what drives them better, we also begin to also better understand the human experience more broadly – and its universal building blocks referred to in the previous section.

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