



LifeRing is a worldwide network of individuals who offer each other peer-to-peer sober support in ways that encourage personal growth and continued learning. Our approach is based on developing, refining, and sharing our own strategies for continued abstinence and crafting a rewarding life in recovery. In short, we are sober, secular, and self-empowered.

LifeRing is an abstinence-based, sobriety support group that is positive, inclusive, and not connected to a religious or spiritual tradition of any kind. If you or your clients would like to learn more about LifeRing and our secular approach to recovery, please visit our website, email us, or give us a call.

This brochure is provided for informational purposes only and is not a substitute for professional legal counsel.

Updated 6/13/2014



LifeRing, Inc.

1440 Broadway, Suite 400
Oakland, CA 94612

800.811.4142 (toll-free)

www.lifering.org
service@lifering.org



Choice, It's the Law

Offering Clear & Equal Choice in Recovery Programs

The established legal standard in the U.S. Ninth Judicial Circuit and what it means to you.

If you are an official of the criminal justice system, serve in a related position of authority over prisoners with a history of substance abuse issues, or you are a prisoner or parolee who objects to the religious content of the substance abuse treatment program or support group you are required to attend, you owe it to yourself to learn more about the August, 2013 Federal Ninth Circuit Court of Appeals ruling in *Hazle v. Crofoot*

LifeRing Service Center
Oakland, CA
www.lifering.org
1-800-811-4142

Background

After his conviction in California on drug charges, Barry Hazle, Jr. was imprisoned and served his time. Upon his release, he was mandated into a residential addiction treatment facility as a condition of his parole. He immediately objected to the religious nature of the treatment facility to which he was sent by the California Department of Corrections. Mr. Hazle specifically requested to his parole officer and Westcare that he be placed in a secular treatment program, stating he was committed to “a full and lasting secular recovery and complete abstinence from illegal drugs.”

Westcare, however, sent Mr. Hazle to a 90- day residential program that uses a twelve- step approach to treatment, an approach that contains religious components and is based on the principles of Alcoholics Anonymous and Narcotics Anonymous. Mr. Hazle was expelled from the treatment center due to his behavior of being, “disruptive, though in a congenial way”, arrested, and sent back to prison for violating the terms of his parole.

Mr. Hazle then sued the parties involved, charging infringement of his First Amendment rights. He also sought injunctive relief from the state for continuing the practice of placing parolees into a non- secular substance abuse program if they object on religious grounds, in violation of established law. The Federal Court for the Eastern District of California ruled that Mr. Hazle's First Amendment rights had indeed been violated but awarded zero damages. Mr. Hazle appealed.

The Ruling

In August, 2013, the Federal Ninth Circuit Court of Appeals in San Francisco ruled in favor of Mr. Hazle. In that ruling, the court held that twelve-step programs are "religious" under the First Amendment of the U.S. Constitution, meaning that a criminal justice officer (or, by extension, any agent of the federal, state, or local government or an employee of a government-funded agency within the bounds of the Ninth Judicial Circuit) can be sued if they ignore a client's religious objections and mandate the client to attend twelve-step based treatment programs or to attend twelve-step meetings without providing a secular alternative.

The ruling is the law in Alaska, Arizona, California, Hawaii, Idaho, Montana, Nevada, Oregon, Washington, Guam, and the Northern Mariana Islands; it serves as legal precedent for the U.S. and its territories. The basic thrust of this case is about the constitutional guarantee of freedom of, and from, religion extending to all citizens of the United States, including those serving time behind prison walls.

**for the full text of the ruling see:
www.ca9.uscourts.gov published opinion
case number 11-15354**

Why is this ruling important to you?

If you are an official in the criminal justice system or serve in a related position of authority over offenders with substance abuse issues, you can help avoid the risk of lawsuits by offering your clients a choice of religious and secular substance abuse treatment programs and support groups. You help yourself, your employer, and your clients by working with treatment service providers to ensure their programs contain a secular track in addition to a twelve-step track. In addition, information you share with clients about secular recovery support programs like LifeRing should be offered in ways that provide a level playing field when it comes to the availability of meeting rooms, publicity, literature, referrals, and other resources.

If you are a prisoner, parolee, or other type of government client who objects to the religious content of twelve-step programs, stand up for your beliefs and make sure your objections are communicated, and documented, clearly and immediately. In the case *Hazle v. Crofoot*, the plaintiff won in part because he wrote letters and filed suit promptly after he was compelled to attend twelve-step recovery programs without being given a secular alternative. As a prisoner or parolee, if you earnestly want to remain clean and sober by actively participating in secular, non-religious substance treatment programs and support groups, make sure your preference is known by those who represent you and your interests in the legal system.