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January 14, 2009

Mr. David Murray
Chief Scientist
Office of National Drug Control Policy
Washington, D.C. 20503

Dear Mr. Murray:

While I appreciate your response to my Oct. 16, 2008, Petition for Correction of Information Publicly Disseminated by ONDCP, it fails to properly address the substance of the complaint.

Your claim that statements of fact need not adhere to Data Quality Act standards if they are presented as the title of an informational document for public dissemination defies any reasonable interpretation. To take a false statement and arbitrarily label it opinion or policy is a transparent attempt to evade the purpose and spirit of the law. Had the title of the ONDCP "Sourcebook" in question been "Marijuana: Why We Believe It Is the Greatest Cause of Illegal Drug Abuse," your claim would have more merit. However, your position essentially allows ONDCP to declare any false statement to be opinion – or worse, policy – thus entirely circumventing the very purpose of the DQA. Such evasive posturing denies the public access to accurate information.

Your argument that the word "cause" in the title "Marijuana: The Greatest Cause of Illegal Drug Abuse" should be taken to mean "explanation," "source," or "reason" obscures the substance of the original complaint, which acknowledges that marijuana is the most commonly used illegal drug. Ignoring that your response misleadingly uses the words "use" and "abuse" interchangeably, your claim boils down to the absurd suggestion that the very existence of a substance or object is the cause of its use or abuse. Substituting the words "explanation," "source," or "reason" for "cause" does not make this false statement any truer. By ONDCP's logic, one could claim that automobiles are the greatest cause of traffic accidents or that food is the greatest cause of obesity. Scientists worth their salt know that correlation does not equal causation. This is a basic scientific tenet that ONDCP should seriously consider re-familiarizing itself with before disseminating any more information about marijuana.

Any reasonable reader will likely conclude that the word "cause" in the title means (to quote Merriam-Webster) "something that brings about an effect or result," and thus does indeed refer to the dubious "gateway" theory that suggests that marijuana use leads to – or causes – abuse of more dangerous drugs. In fact, contrary to your assertion that it does not, the "Sourcebook" directly references the "gateway" theory in that context, misleadingly stating, "Recent research supports the 'gateway' dimension of marijuana —

Minimize the harm associated with marijuana.

that its use creates greater risk of abuse or dependency on other drugs, such as heroin and cocaine (Page 7)." Notably, the "Sourcebook" provides no citations for any research supporting that statement and ignores the large and growing body of research contradicting it.

As your response neither corrects the false information outlined in the original complaint nor adequately explains your office's public dissemination of false information in direct violation of the Data Quality Act, please provide me – and the public – with a more appropriate response, as required under ONDCP quality guidelines, Sections II and III, as well as OMB guidelines, Sections III and IV. Of course, correcting the title and issuing a public statement as previously requested is MPP's preferred response.

Sincerely,



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