

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

WORLD SERVICE OFFICE, INC., a :
Charitable Corporation and :
Trustee of the Copyrights, :
trademarks and Service Marks :
for the Fellowship of :
Narcotics Anonymous (WSO) : Civil Action No. 90-7631
:
Plaintiff :
:
vs. :
:
DAVID MOORHEAD, :
:
Defendant :

DECLARATION OF JIM & KATLEEN MILLER

We, have been members of the Fellowship of Narcotics Anonymous for some time and are aware of the nature and extent of the Fellowship concerns regarding the literature of the Fellowship.

We, as aware members of the Fellowship, were asked to be a part of a volunteer group of members to work on the review of the Fellowship Literature Trust Document.

We, first participated in discussions with other members of the Fellowship as well as several trusted servants from the Fellowship Service corporation, the WSO, being Stu Toordeman and George Hollahan, in Harrisburg in February of 1991.

At that time the legal action against David Moorhead who was challenging the claim of exclusive rights to N.A. Fellowship Literature had just been settled and he and the stated trusted servants from the service corporation were working on a solution for the literature dispute, being a fellowship wide

The purpose of the discussions we had were to heal the the division in the Narcotics Anonymous Fellowship which resulted in the David Moorhead litigation.

We were to be a part of the working group that was to draft the Intellectual Property Trust document which would accurately describe the origin, ownership and purpose of Narcotics Anonymous Literature and the bond of trust between the Fellowship of Narcotics Anonymous and it's service boards, committees and service office.

The initial participants in these discussions included members of the fellowship from all interests including those who participating in writing the Basic Text from 1979 to 1982.

During the discussions in February, we understood Stu Toordeman to clearly state that the WSO, Inc. would not suggest any definitive action regarding the copyrights on NA literature during the World Service Conference in April of 1991 and their would be NO MOTIONS made to approve such ownership and exclusive rights of control. He reaffirmed this promise to us duing a phone call in April prior to the Conference.

When suggestions were made regarding the WSO's reference in the World Service Conference Agenda Report about such actions and work in progress on literature-copyrights, he responded that "we will keep things status-quo until we get finished with the trust document".

Stu Toordeman broke his promise to us when, during the WSO report at time of the World Service Conference he proceeded with what he then called "AFFIRMATIONS" not motions and even had the attorney address the conference. He moved for the approval of the exclusive right to use the Fellowship Literature despite his promise, and he and the WSO attorney failed to advise the Fellowship about the Trust Document Working Group.

We have now read a certain Motion to Enforce or Vacate the court Order in this case and can affirm that to the best of our information and belief that the allegations contained therein are true and correct.

We declare under penalty of perjury under the laws of the United States, California and Pennsylvania, that the foregoing statements are true and correct and that this declaration sets forth our own statement of just some of the ongoing statements, assurances and representations given to us from the WSO trusted servants that have subsequently turned out to be false.

We declare under penalty of perjury under the laws of the United States, California and Pennsylvania, that the foregoing statements are true and correct and that this declaration sets forth our own statement of just some of the ongoing statements, assurances and representations given to us from WSO inc. employees that have subsequently turned out to be false.

Date: April 20, 1991

Jim Miller
Kathleen Miller