

This is a paragraph by paragraph letter written by a concerned member, as a rebuttal to the World Board's denial of the South Florida Region's request for an inspection of NAWs, Inc.'s records. The WB's denial letter was dated August 29th, 2017.

Paragraph 1 "The April 17,2017 letter from the regional delegate...." This paragraph doesn't explain in any way why the inspection has not taken place as yet. While it says "and has spent significant time and resources in addressing its form and contents.", there is no cogent reason mentioned as to why time and resource was not spent in arranging the inspection, when in the operational rules, Art. V sec. 3 simple and clear method and criteria is detailed, which the April 17,2017 letter from the regional delegate amply fulfilled.

Paragraph 2, "We all are aware that this is the first time..." The statement in first sentence is incorrect because the FIPT is in existence for 25 years and the Operational Rules has last modified 5 years ago, and you, the WB have been aware of it for 5 years or more. Article IV of the trust instrument states "The Trustor shall generate Trust Operational Rules which shall be controlling on the Trust and the parties thereto except if such Rules conflict with the terms of this Instrument. "The request for inspection does not come into conflict with the Trust Instrument and no such conflict has been established in the letter of 29, August. Moreover, Article V Sec. 3 of the Trust Instrument says in "Section 3: Trustee's standard of care - The Trustee shall administer the Trust with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of like character and with like aims to accomplish the purposes of the Trust as determined from the Trust Instrument" and you the WB cannot plead ignorance or inability to deal with the request for inspection which is defined in operational rules. Thus, your plea of ignorance or inability cannot and do not apply.

Paragraph 2, "The World Board will therefore be sending the South Florida Region's request to the World Service Conference for guidance." ARTICLE IV: OPERATIONAL RULES of the Trust Instrument says The Trustor shall generate Trust Operational Rules which shall be controlling on the Trust and the parties thereto except if such Rules conflict with the terms of this Instrument." The Trustor, i.e. WSC, has generated a Trust Operational Rules and now the rule is binding on Trustor, Trustee and Beneficiary. The Art. V sec. 3 of Trust Operational Rules has no provision or opportunity for the Trustor to offer guidance or otherwise interfere with, control or pass any judgement on a valid request for inspection, which is the prerogative of a Region, and therefore, your statement and purported decision is in clear, deliberate and serious violation of the FIPT itself, specifically Article IV of FIPT and The Art. V sec. 3 of Trust Operational Rules.

Paragraph 3 "This same section requires both a motion to..." The Art. V sec. 3 of Trust Operational Rules is quite clear about the criteria for a valid request for inspection. The South Florida Region's request consisted of a) Motion in RSC, b) undertaking for bearing their own cost, and c) a written request detailing its concerns, and as it fulfilled all three of the criteria, the request merits

compliance without any hesitation, and what the WB believes or does not believe is entirely irrelevant in the Art. V sec. 3 of Trust Operational Rules, when the Art. V sec. 3 of Trust Operational Rules clearly states that the “concerns” will be a part of “written request” of criterion 3 and need not be a part of the “motion” of criterion 1.

Paragraph 5 “This motion is most general in nature....” The request for inspection is consistent with the motion of South Florida RSC and addresses legitimate factual concerns, as detailed in the written request. The Operational Rules is quite clear about the criteria for a valid request for inspection. The South Florida Region’s request consisted of a) Motion in RSC, b) undertaking for bearing their own cost, and c) a written request detailing its operations of NAWS that relate to the Trust and those that do not’ is not only ill-conceived, but also demonstrates your poor knowledge about FIPT, because it is contrary to the operational rules, which clearly states “A Trust inspection conducted by a regional service committee on behalf of the Beneficiary may examine any aspect of the Trustee’s operations, including all records, with the exception of documents privileged by law, including but not limited to the Trustee’s personnel records.”. Therefore, any and every aspect of NAWS’ operation is within the ambit of inspection.

Paragraph 7 “We want to share with the region...” The request for inspection is consistent with the motion of South Florida RSC and addresses legitimate factual concerns, as detailed in the written request as is stipulated in point 3 of Section 3 of Article V of operational rules and your purported doubt about complying “with the requirements of the Operational Rules” is completely without grounds and cannot and do not apply.

Paragraph 8 “By the same token, we think that a request...” It is clearly articulated in Section 3 Article V of Trust Operational Rules in Inspection limitation “A Trust inspection conducted by a regional service committee on behalf of the Beneficiary may examine any aspect of operations of NAWS that relate to the Trust and those that do not’ is not only ill-conceived, but also demonstrates your poor knowledge about FIPT, because it is contrary to the operational rules, which clearly states “A Trust inspection conducted by a regional service committee on behalf of the Beneficiary may examine any aspect of the Trustee’s operations, including all records, with the exception of documents privileged by law, including but not limited to the Trustee’s personnel records.” Therefore, any and every aspect of NAWS’ operation is within the ambit of inspection.

Paragraph 12 The two portions from the minutes quoted in the letter of 29 Aug are illustrative of the issues that were not being properly disclosed to the Beneficiary, and therefore this inspection becomes necessary. Specific concerns were detailed in the written request for inspection, as per the Art V Sec 3 of rules.

Paragraph 13 “If these paragraphs of Intent and” Whether or not the South Florida RSC decides to pass further resolutions, the motion along with the written request containing concerns, as submitted to you, are fulfilling the criteria of Art V Sec 3 of rules, and as a party to the FIPT, it is the bounden duty of NAWS Inc., as well as its board of directors i.e. WB, to immediately arrange and start the inspection process forthwith, without demur. Not doing so amounts to violation of

FIPT. South Florida RSC will ponder on the suggestion of motion without prejudice to its legal rights and contentions.

Paragraph 14 “You should know...” We are saddened and surprised to know. As this provision was there in the operational rules, preparing and providing for such eventuality should not have been neglected. If as per Article V Sec 3 of the Trust Instrument, ‘care, skill, prudence and diligence’ was exercised, as you are bound to by the Trust, such inspections would not have been either very difficult, expensive nor time-consuming. However, as this inspection is mandated by the operational rules prevailing upon Trustee, it is the bounden duty of Trustee to arrange and co-operate without hesitation, reservation or demur.

Paragraphs 15, 16, 17 & 18 As for ‘Concern A’, it is contended that neither the satisfaction or the decisions of WSC, nor the ‘routine accounting practice by NAWs’ can pose any hindrance to your complying with the request for inspection, which is a legitimate right of the Beneficiary Region.

As for ‘Concern B’ it is not your assurances that is sought, the actual details of these deals are asked to be disclosed, which should not be a problem, nor very time consuming. As much as permitted by Article V Sec 3 of operational rules, these are a legitimate right of the Beneficiary Region, which cannot be denied to the Region.

As for ‘Concern C’ our contention and refuting of your letter is same as last paragraph. Lastly, while it is appreciated that much has changed in NA, you are reminded that the FIPT & its Operational Rules has not changed and you are called upon to obey the rules which you are legally bound to obey.

Reporting to California AG, or other audit exercise are not material to complying with the request for inspection, nor are the contentions of expenditure of resources It is requested that the inspection be arranged forthwith without demur.

If a clear, unconditional communication to do so is not received within 30 days from the receipt of this letter, please be advised that the matter may be taken before and agitated before appropriate Courts of Law.