

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, :

Plaintiff, :

v. :

DAVID MOORHEAD, :

Defendant. :

**DECLARATION OF GEORGE HOLLAHAN**

1. I am employed by WORLD SERVICE OFFICE, INC. as an Executive Assistant. I respond directly to the Acting Executive Director of WORLD SERVICE OFFICE, INC., Stuart Tooredman. I am presently the primary manager for WSO's membership services provided to the Fellowship. I have worked within the service structure of the Fellowship of Narcotics Anonymous for in excess of ten years, both in unpaid volunteer positions at the World Service Conference and at World Service Office in paid positions. I am executing this declaration in my present capacity of Executive Assistant of the World Service Office. All the facts and matters set forth herein are true of my own knowledge, or if set forth on information and belief, are believed to be true, and I would and could competently testify thereto.

2. I have known the defendant in this action for six years. I first met him at a Fellowship conference held at Boulder, Colorado when I was sitting as Chairman of the

World Service Conference. In the following years, I have encountered him several times. Defendant Moorhead uses the pseudonym "Grateful Dave".

3. On Friday, September 14, 1990, I spoke to defendant Moorhead by telephone. In this conversation, Moorhead advised me that he was selling copies of a Basic Text that he had produced, and that he planned to produce an additional 50,000 copies. Moorhead indicated that people were contacting him and requesting copies of his version of the Basic Text. He said that he also intended to begin production of copies of WSO's basic information pamphlets, which we refer to as "I.P.s". I told him that this was not right, that he had no right to revise or duplicate the Basic Text, infringe WSO's copyrights, or to use the NARCOTICS ANONYMOUS trademarks. He responded that he did not think his actions were wrong.

4. On Saturday, September 22, 1990, both I and defendant Moorhead attended an Open Meeting of the Fellowship in Fort Lauderdale, Florida. This meeting was set up by a Fellowship group for the purpose of discussing defendant Moorhead's version of the Basic Text. I was to present WSO's view of the problem, and Moorhead was to present his view. During that discussion, Moorhead stated that he felt he had the right to reproduce the Basic Text, however he had no explanation for his claim of right.

5. On Sunday, September 23, 1990, I attended a Fellowship workshop in South Dade County, Florida relating to issues relevant to the operation of the WSO. It was general knowledge within the local members of the Fellowship that I would be present to answer questions. At four o'clock in the afternoon, shortly before my presentation began, Moorhead appeared at the workshop. He walked up to me and handed me a brown envelope, and stated "this is 'hot off the press'". I looked in the envelope and found an unauthorized



duplication of the Basic Text. A photocopy of the contents of the envelope is attached hereto as Exhibit A and incorporated herein by reference as though fully set forth herein.

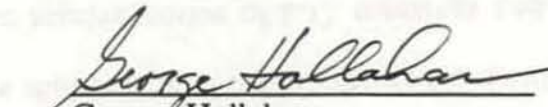
6. I have since compared the unauthorized copy of the Basic Text with authorized copies of the Basic Text. Defendant Moorhead's unauthorized copy consists of the Third Edition (Revised), plus portions of the Second Edition.

7. I received another Basic Text copy claimed by Moorhead which also bears on the cover "FELLOWSHIP APPROVED F.L.C.". A true and correct copy of that cover is attached hereto as Exhibit B and incorporated herein. Within the Fellowship, "F.L.C." is understood as "Fellowship Literature Committee." The Literature Committee is made up of many individuals that are located all over the United States. Literature is submitted to the Committee for careful review to insure that it contains an accurate reflection of the message of the Fellowship. This is a time consuming and sometimes difficult process. However, once literature is reviewed by the Literature Committee and subsequently approved by the World Service Conference, the demand for the literature increases as all members of the Fellowship know that this literature has undergone and passed a scrupulous review.

8. I personally supervise the coordination of the literature approval process at the WSO used by the Literature Committee of the World Service Conference. It is my ultimate responsibility, as directed by the chairperson of the Literature Committee, to make sure that all members of that committee receive notice of L.C. meetings and copies of submitted literature. By reason of my coordination responsibilities, I am familiar with every piece of literature that enters into the process, as well as which pieces of literature are approved. Defendant Moorhead has never even submitted his version of the Basic Text to the

Literature Committee, much less been granted approval status. Defendant Moorhead's version of the Basic Text is not "F.L.C." approved.

I declare under penalty of perjury under the laws of the United States, and the State of Pennsylvania that the foregoing is true and correct and that this declaration was executed on November 27, 1990 at Van Nuys, California.

  
George Hollahan

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wso/moorehea/decl.gh