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April 25, 1992

John T. Synnestvedt, Esquire
SYNNESTVEDT & LECHNER
2600 One Reading Center
1101 Market Street
Philadelphia, PA 18107

Via TELEFAX (215) 923-2189

RE: PETITION TO ENFORCE OR VACATE/PRELIMINARY INJUNCTION
MOORHEAD v. WSO, INC.
90-7631 Eastern District of Pa., Fed. Dist. Ct.

Dear Mr. Synnestvedt:

You have confirmed by telephone conversation that your firm will continue as legal counsel for the WSO in this pending matter and that you have had the opportunity to partially review the pleadings and issues with your client. Further, you have requested that my client present a proposal setting forth a "bottom line" request for the resolution of his legal claims. Additionally, you have inquired as to the status of the other grievances to be advanced by the group ("class") of Fellowship Members effected by the Fellowship Intellectual Trust Document input, review and approval process and to be affected upon approval of the proposed Trustor/Trustee orientated trust document. Finally, I have advised that my client would respond to your inquiries in the spirit of compromise and without any waiver of rights, prejudice or limitation of legal or Fellowship remedies nor with authorization for any use of this letter or contents hereof except for internal discussion.

Accordingly my client advises as follows:

I. Pending Legal Matter

First, in respect to the legal issues pending with the Court, the Petitions and accompanying supporting exhibits set forth with specificity the exact nature and extent of your client's acts and omissions in violation of the Courts Order and parties Agreement of January 4, 1991 by proceedings thereafter to restrict Fellowship literary works. My client is ready to proceed with his request for the relief of Enforcement of that Order and Agreement in a manner

determined by the Court as just and proper. If no remedy can be provided, then my client desires to have the Order and Agreement Vacated, the pleadings closed and the issue of copyright, patent, trademark, tradename, service marks and other intellectual properties created under the fiduciary trust litigated. In the interim, so that no further prejudice would occur to my client's claim of rights, the preliminary injunction would be requested in the form of a temporary restraining order of the fashion served. In absence of compliance therewith, the proceedings for contempt would be filed and Rule thereon pursued.

On April 23, 1992, during the requested expedited conference with Honorable Louis H. Pollak, the Judge made it very clear to both of us that he was "leaving the legal matter in our hands as Officers of the Court" with the obligation of resolving the issues in dispute "without creating more internal strife in the Fellowship". The strong recommendation was made to undertake that requested amicable resolution in the "constructive spirit as exhibited at the close of the proceedings in 1991" and with the WSO "directed to accommodate the concerns of the Defendant as specifically addressed by his pleadings". Judge Pollak firmly advised that "further litigation would not be appreciated" and that "if compelling need exist, he would make himself available for further conference and/or a hearing as required" to resolve the parties disputes.

Your willingness to discuss the issues since the conference call is in line with these instructions and is appreciated. I am concerned, nevertheless, that a resolution short of an immediate agreement by the WSO to; (a) withdraw the Trust Document Motion, (WSC 1992 Board of Trustees, Motion #8), (b) acknowledge the necessity of the Trust Document Working Group to continue its input and review, and (c) advise the Fellowship of my client's role as "a protector not a violator" of their property, will require me to schedule a hearing on the Motion for Preliminary Injunction for this coming week with entry of a Temporary Restraining Order pendente lite. You have advised that the Trust Document Motion may be presented at the Conference as early as Wednesday, April 29. In the absence of a legal resolution prior to an approval of the Trust Document, the dispute will then be enhanced to include the group of aggrieved members under separate beneficiary action(s).

II. Settlement Agreement

My client is reluctant to enter into a further settlement agreement with the WSO in light of the personal experience following the October 1990 attempt and now the January 1991 fiasco. He will however follow the direction of the Court, and has authorized me to undertake whatever steps are necessary to arrive at an amicable resolution under the spirit exhibited at the close of the 1991 proceedings. Further, upon reciprocal agreement from the WSO, et al, he will agree to the request from Judge Pollak

to preserve the status quo pending final resolution of the literary right dispute. It is requested that during the settlement negotiations, all publication of the legal action be "without comment", meaning NO COMMENT, whether by officers, trustees, lawyers, etc. to the Fellowship so as to avoid further internal strife as requested by Judge Pollak. Finally, my client's name must be kept clear from any further defamatory conduct and personal assault. The WSO is to ensure that all intentions and action of my client are portrayed in a positive nature so as not to further prejudice him or other objectors. Any resolution, including an interim agreement, must be based on his contributions, not dissention being recognized.

You have requested the "bottom line" from my client. Other than the relief requested in his Motions, my client wants the truth to be made known, ie., that the WSO, et al., acknowledge and uphold the rights of the Fellowship to the Fellowship's literary works and other intellectual properties. It is the members who have exclusive rights, under the fiduciary agreement called the WSO bylaws, to use the literary works, trademarks, tradenames, service marks etc. within the Fellowship and under the guidance of the Steps and Traditions. All registrations of the aforementioned items need to be correctly registered in the name of the Fellowship. The organization (WSO, Inc.) is NOT NA, but only a "fiduciary" to hold in trust the literature and other intellectual properties created by the Fellowship. The Fellowship must be allowed and encouraged to continue its primary purpose. This is best served by the Groups through the free use of the Fellowship literary and intellectual properties.

Rather than confirm the Fellowship rights by legal means, my client is suggesting, (as he has for several years), to properly put the literary and intellectual rights under a well defined trust document. This direction was being followed until the WSO terminated the Trust Document Working Group. The original Trust Document Working Group needs to be immediately reinstated to complete their task within an agreed time. To avoid further disputes, specific guidelines for completing the Trust Document and to obtain full Fellowship input and review need be established.

III. Further Actions

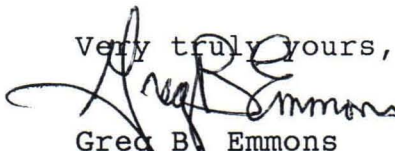
So long as the "illicit" Trust Document as currently offered for approval is not enacted and the Fellowship is allowed to approve a proper Trust Document, no further legal actions would need to be commenced. At such time as negotiations break down or advice is received that negative comments are coming from Dallas, or thereafter which lead to taint or influence the Fellowship to the WSO point of view, the additional legal pleadings will be filed in the appropriate jurisdictions.

Quite simply, the proposed Trust Document is improper and unlawful for the reasons set forth in my clients motion and exhibits. For the WSO to pursue approval of the legal document in light of the known objections and legitimate concerns would be one more step in furtherance of its attempt to take NA away from its members. My client is representative of a growing group of members who question with much dissatisfaction what big business has done to the Fellowship of Narcotics Anonymous. The time has come for someone to go forward to take on Goliath, whether that be now with the immediate literature concerns or hereafter regarding financial accountability and mismanagement. Unfortunately, the internal Fellowship procedures no longer function responsively to the members and legal means have become necessary.

After reviewing these issues with your client please advise. By late Monday we should be able to determine if a settlement agreement can be reached or if our schedules need be arranged for a court appearance. If an agreement is to be reached, unless the vote on Motion #8 is postponed, tabled or withdrawn, then confirmation need be completed by Wednesday. In any event, as moving counsel, I will be providing Judge Pollak with a status report at the end of the day Monday. Please let me hear from you. If you desire, I can be reached on Sunday at my home number, (215) 348-3785.

Thank you.

Very truly yours,



Greg B. Emmons

GREG B. EMMONS AND ASSOCIATES, PC

GBE: ge

cc: Dave Moorhead, via fax
circulation code 1-27