

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

WORLD SERVICE OFFICE, INC., a	:	
Charitable Cooperation 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 & KATHLEEN MILLER

We have been members of the Fellowship of Narcotics Anonymous since 1979 and 1981 and are aware of the nature and extent of the Fellowship concerns regarding the literature of the Fellowship. Jim was a member of the WSC Literature committee from 1979 through 1984, participated in the writing of the basic text, many of the NA pamphlets, and is sole author of the NA pamphlet "One Addict's Experience with Acceptance, Faith, and Commitment", as well as co-chairman/ editor of the NA Way magazine in 1982 & 1983. Kathleen was a member of the WSC NA Way committee and attributes much of her recovery from addiction to early use of an NA Basic Text which was printed in her home area and given to her free.

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

We first participated in discussions regarding this Trust Document, along with other members of the Fellowship as well as employees from the Fellowship's primary service center, WSO inc., being Stu Toordeman and George Hollahan, in Harrisburg, Pa. in February of 1991.

At that time the legal action against David Moorhead who was challenging the claim of exclusive rights to NA Fellowship Literature, had just been "settled". We have known David Moorhead eight years and know him to be an informed, active NA member and a man of integrity, and good moral character, who was complying 100% with the court order. Mr. Moorhead and the stated WSO inc. employees were working on a solution to the literature dispute, being a Trust agreement acceptable Fellowship-wide.

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

We were to be 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.

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 that there would be no motions made to approve such ownership and exclusive rights of control. He reaffirmed this promise during 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's report at the World Service Conference he proceeded with what he 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 WSO inc. employees that have subsequently turned out to be false.

Date: April 20, 1991

Jim Miller
Kathleen Miller