

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 : Civil Action No. 90-7631  
:  
Plaintiff :  
:  
vs. :  
:  
DAVID MOORHEAD, :  
:  
Defendant :

DECLARATION OF WILLIAM M. ALLEN III

I have been a member of the Fellowship of Narcotics Anonymous since 1979 and am aware of the nature and extent of the Fellowship concerns regarding the literature of the Fellowship.

At MARLCNA, in February of 1991, at a second meeting of the Trust Group, I met with Stu Toordeman and George Hollahan, employees of WSO, and David Moorhead, Jim Miller, Kathleen Miller, Bo Sewell, Carl Diehl and Oma Jackson as concerned members of the Fellowship who desired to participate in the literature trust document approval process.

At that time, both Stu and George clearly stated that the WSO would not proceed further with any attempts to obtain exclusive rights over the N.A. Literature including the Basic Text, but rather wait until the Fellowship approved the Trust Document.

At the time there was concern that the 1991 Conference Agenda Report contained, in the section from WSO Inc., written by Stu Toordeman, an apparent request from the WSO Board of Directors that the Conference confer exclusive rights to NA Fellowship Literature to WSO, Inc.

Stu Toordeman assured us that no Motion was being submitted on the issue and that the status quo would be maintained until after the Trust Document review group completed its task.

After the initial discussions between members of the WSO and concerned members of the Fellowship who participated in the Trust Document Review Group, it became apparent that the WSO did not want to communicate with us. It became necessary for me to make phone calls to them to obtain documents that were promised and then mail would not arrive to me by the time of our scheduled phone conferences.

I participated in two extensive phone conferences to discuss the proposed Trust Document and significant objection was raised to the draft presented to us.

In response to the objections, Stu and George advised that the Trust Document would be revised until it was agreeable and would be submitted to the Fellowship for comment and review of no less than one (1) year.

George also advised us, after the 1991 World Conference vote on the literary affirmations that became very controversial, that once the Trust Document was approved, the affirmations would be superceded.

In June, without ever completing the review among the members of the group, the WSO advised that our input would no longer be necessary and that they were stopping the group due to lack of funds.

Once the Conference Agenda Report was issued and the proposed trust was published to the Fellowship a significant amount of controversy developed with more concerns about the impact of the trust document coming to the focus.

In March of 1992, I attended the South Florida Spring Service Break Conference and heard Bob McD, the chairperson of the Board of Directors of the WSO represent to the members of the Fellowship in attendance that the proposed trust document had met the approval of the members of the trust working group.

It became necessary for me to stand up and voice my objection to his misleading and totally inaccurate remarks. I have knowledge that similar presentations were made at other conferences and workshops however no member of the working group was able to confront and correct the misrepresentation.

I declare under penalty of perjury under the laws of the United States, California and Pennsylvania, that the foregoing statements are true and correct.

Date: April 20, 1991

*William M. Allen III*