

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

WORLD SERVICE OFFICE, INC.,
a Charitable Corporation
Trustee of the Copyrights
Trademarks and Service Marks
for the Fellowship of
Narcotics Anonymous,

Plaintiff,

Civil Action No. 90-7631

v.

DAVID MOORHEAD,

Defendant

DECLARATION OF GEORGE HOLLAHAN

George Hollahan hereby declares under penalty of perjury as follows:

1. I am the Director of Fellowship Services for the World Service Office, Inc. (hereinafter "WSO"), plaintiff in the above-captioned matter. I testified at the Hearing held in Philadelphia on January 2, 1991 on behalf of the WSO, and I am executing this Declaration in my capacity as Director of Fellowship Services for the WSO. All the facts and matters set forth herein of my own knowledge are true, or if set forth on information and belief, are believed to be true, and I would and could competently testify thereto.

2. On January 15, 1991, Stuart Tooredman, David Moorhead and I executed a statement entitled "Our Commitment to Unity" which was directed toward achieving the objectives set forth in paragraph 3 of the Settlement Agreement executed January 4, 1991. This statement was jointly prepared at the WSO's offices in Van Nuys, California by David Moorhead, myself and members of the WSO staff. This document is attached as Exhibit D to the List of Exhibits

accompanying Moorhead's Motion. The statement was published by the WSO in the January Fellowship Report and the February, 1991 Edition of the NA Way in time for the 1991 World Service Conference, which commenced on April 21, 1991. Due to severe budgetary constraints, the WSO was not able to publish the March, 1991 Edition of the Newsline which would have preceded the 1991 World Service Conference. David Moorhead was advised of this fact while he was at the WSO's offices, in January, 1991, working on the preparation of the joint statement. He did not indicate any objection. Because of continuing financial problems, no edition of the Newsline was published during 1991.

3. I oversaw and supervised the production and mailing of the 1991 Conference Agenda Report for the 1991 World Service Conference of the Fellowship of Narcotics Anonymous. A true copy of the 1991 Conference Agenda Report is attached hereto as Hollahan Exhibit A.

4. The 1991 Conference Agenda Report was mailed to all required recipients and Regions at least ninety days before the commencement of the 1991 World Service Conference on Sunday, April 21, 1991.

5. I personally handed defendant David Moorhead a copy of the 1991 Conference Agenda Report in January, 1991.

6. The three Motions, called for in paragraph 4 of the Settlement Agreement, were published in the 1991 World Service Conference Agenda Report as Motion Nos. 13, 14 and 15. In addition, the Motions were preceded by the introduction called for in paragraph 4 of the Settlement Agreement and the comments of the Honorable Louis H. Pollak entered on the record at the Hearing on January 2, 1991.

7. In April, 1991, I participated in a telephone conference which included David Moorhead, who uses the pseudonym "Grateful Dave." During the telephone conference, the subject of the WSO's compliance with the Settlement Agreement entered on January 4, 1991 was discussed. During this telephone conference, David Moorhead stated that the WSO had complied with the terms of the Settlement Agreement.

8. Motions Nos. 13, 14 and 15 were fully discussed and fairly debated by the 1991 World Service Conference during an approximate two and one-half hour debate. At least 25 to 30 conferees took part in the debate. All three Motions were defeated by large majorities of the attending conferees. Relevant portions of the Draft Minutes of the 1991 World Service Conference relating to these Motions are attached hereto as Hollahan Exhibit B.

9. While Motion No. 14 calling for a reduced priced Basic Text was defeated, the World Service Conference, responding to the call for lower priced literature, directed the WSO to produce an "Introductory Guide to Narcotics Anonymous." This Guide is a compendium of approximately seven Fellowship pamphlets, including "Am I an Addict" and "Welcome to NA," as well as Chapter 4 of the Basic Text, 5th Edition, in its entirety. Chapter 4, approximately thirty-five pages in length, explains the Narcotics Anonymous Twelve Steps to Recovery, the heart of the Narcotics Anonymous program. This Guide sells for \$2.50.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 4, 1992


George Hollahan