

BY _____
ATTORNEY

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BY [Signature]
ATTORNEY

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 (WSO)	:	Civil Action No. 90-7631
	:	
Plaintiff	:	
	:	MOTION TO ENFORCE OR
vs.	:	VACATE ORDER
	:	
DAVID MOORHEAD,	:	
	:	
Defendant	:	

ORDER

AND NOW, after consideration of the Petitioner, DAVID MOORHEAD'S Motion to Enforce or Vacate, and proceedings held thereunder, it is hereby ORDERED and DIRECTED that:

(a) The presentation for approval by the Plaintiff, its agents, servants or employs, or anyone acting in concert with it or under its supervision, direction or control, including but not limited to the World Service Office Board of Trustees, World Service Conference Administration Committee and the World Service Board of Directors by vote at the 1992 World Conference held from April 25, 1992 to May 5, 1992 in Dallas, Texas, on Motion #8, or

any other motion or affirmation for approval of the Fellowship Intellectual Trust Document or other act which effects the literary rights of the Fellowship of Narcotics Anonymous, is STAYED for a period of no less than one (1) year from this date;

(b) The Plaintiff shall allow the Fellowship, by Group Conscience, to appoint a representative from each Region to serve on a specially created Beneficiary Advocate Committee of the Fellowship of Narcotics Anonymous to review the Fellowship Intellectual Property Trust Document and give unbiased and independent advice and comment to the intended beneficiaries prior to further proceedings by the Plaintiff to have the Fellowship approve or disapprove the proposed Fellowship Intellectual Property Trust Document;

(c) The Beneficiary Advocacy Committee shall be funded by the World Service Office and shall work with the World Service Committee Board of Trustees to present a unified and accepted Literary Trust Document to the Fellowship for review at least six (6) months prior to further motion for approval; and

(d) Such other relief as is just and proper, including retaining continuing jurisdiction for the enforcement of this Order with power of Contempt upon non compliance herewith.

BY THE COURT

JUDGE, UNITED STATES DISTRICT COURT

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

WORLD SERVICE OFFICE, INC., a	:	
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Narcotics Anonymous (WSO)	:	Civil Action No. 90-7631
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Plaintiff	:	
	:	
vs.	:	
	:	
DAVID MOORHEAD,	:	
	:	
Defendant	:	

MOTION TO ENFORCE OR VACATE ORDER

COMES NOW, the Defendant, DAVID MOORHEAD, as the Petitioner pursuant to the Courts retained continuing jurisdiction over enforcement, who hereby moves this Court to enforce or vacate the Order of this Court of January 4, 1991 as is determined just and proper and in support thereof alleges:

I. BACKGROUND

1. On or about December 4, 1990, the Plaintiff commenced this civil action against your Defendant alleging Copyright Infringement, Federal Trademark and Service Mark Infringement, Common Law Unfair Competition, Lanham Act violation and Common Law Trademark Service Mark Infringement.

2. On January 3, 1991, the Plaintiff proceeded with testimony and offering of documentation to support it's claim to ownership and enforcement rights of the name and literary works of Narcotics Anonymous at time of a Preliminary Hearing on its Motion for a Preliminary Injunction against the Defendant, and those people acting in concert or in participation with him.

3. Defendant by rebuttal, as set forth by documentation of long standing open public use and testimony from a participant in writing the subject original work "Basic Text" of the Fellowship of Narcotics Anonymous, challenged the authority and propriety of the Plaintiff to claim and enforce exclusive ownership and control over the name, marks and literary works of Narcotics Anonymous under among other arguments "Fair Use" and "Public Domain" and as otherwise limited by the Plaintiff's role as a Fiduciary Non Profit Corporation serving only for the interest of the members of the Fellowship of Narcotics Anonymous and the still suffering addict and not as a multimillion dollar business Plaintiff has developed into.

4. On January 4, 1990, after a day of proceeding at the Preliminary Hearing on Plaintiff's Motion for a Preliminary Injunction against your Defendant, after extensive negotiations and discussions including firm direction of this Court that a settlement agreement be reached and after assurances by the Plaintiff of acting in good faith with spiritual intentions; the Defendant without admission of any wrongdoing, violation or infringement or acknowledgement of trademark and copyright validity under the Plaintiff's claims, entered into a Settlement Agreement

with the Plaintiff, (Exhibit "A").

5. Upon request of the Plaintiff's legal counsel and the Plaintiff, (who at all times herein acted by or on behalf of its agents, servants or employs), and with assurances that the Agreement would be honored and the ultimate issue of copyright and trademark ownership resolved within the Fellowship of Narcotics Anonymous, the Defendant agreed to this Court entering the Order of January 4, 1991, permanently enjoining the Defendant from the specified use of the name Narcotics Anonymous and/or literary works and publications of the Narcotics Anonymous Fellowship. (Exhibit "B").

6. The Court's Order of January 4, 1991, was entered only in consideration of the Agreement, (See Para #1 thereof), and provided that the Court was to retain continuing jurisdiction over the enforcement of the Order and Agreement.

7. By further Order of this Court, dated January 24, 1991, this action was marked closed for statistical purposes "without prejudice" to the rights of the parties and subject to being restored to the trial docket to proceed to final disposition. (Exhibit "C").

8. The issue in dispute in this pending action involves a claim of ownership of literary rights that has been unresolved for in excess of ten (10) years on an ongoing and continuing basis of objection by the Defendant and other members of the Fellowship of Narcotics Anonymous, and the dispute needs to be judicially resolved in the best interest of all parties or otherwise properly resolved within the Fellowship pursuant to the letter and intent

of this Court's Order of January 4, 1992 and subsequent events, circumstances and agreements reached between the parties hereto.

9. The parties hereto are bound to act pursuant to certain bylaws, guidelines, traditions, policies and proceedings of the Fellowship of Narcotics Anonymous with the Plaintiff serving in a role as a fiduciary to the Defendant and other members of Narcotics Anonymous.

II. POST AGREEMENT CONDUCT

10. After the date of the Agreement and the aforesaid Orders, the parties commenced efforts at complying with the terms and conditions of the Agreement:

- (a) by publishing a combined statement to the Fellowship of Narcotics Anonymous known as "Our Commitment to Unity", (Exhibit "D"), as signed by the WSO representatives Stuart Toordeman and George Hollahan and by the Defendant, which statement sets forth the parties' intent to resolve the longstanding issues over the ownership and use of the Narcotics Anonymous literary works;
- (b) by placing the agreed Motions concerning the Fellowship Literary Works ("Literary Work Motions"), in the 1991 Conference Agenda Report of the World Service Conference together with the closing remarks of the Honorable Lewis H. Pollak (Exhibit "E"); and
- (c) by undergoing an effort of resolving the ongoing question, dispute and difficulties associated with the ownership of the name and literary works of Narcotics Anonymous for the benefit of the entire Fellowship as more fully set forth hereafter.

11. In furtherance thereof, the Parties established a

committee and/or group known as the "Trust Document Working Group" consisting of several members of the Fellowship, (who had participated over the past 10 plus years in writing the Fellowship Literature, including but not limited to the Basic Text), as well as your Defendant and Trusted Servants and other representatives of the Plaintiff to work on creating a trust document for the ownership and management of the Narcotic Anonymous Fellowship Literary Works, Tradename and Trademarks, being known hereafter as the "Fellowship Intellectual Property Trust".

12. The Trust Document Working Group met in Harrisburg, Pennsylvania in February, 1991 and thereafter exchanged comments and proposals for the Fellowship Intellectual Trust Document including two extensive transcribed conference calls on May 30, 1991 and June 25, 1991, wherein representatives from the Plaintiff confirmed assurances. (Exhibits "F" and "G").

13. During this same time, when it appeared that the Plaintiff was working with the Defendant and members of the Trust Document Working Groups in good faith and with representations and assurances that their concerns and input about ownership of the Narcotics Anonymous literary work would be resolved to the mutual satisfaction of the parties, the Plaintiff proceeded with its undisclosed and ongoing tactical planning, scheming and adhorent behavior of controlling and acting as if the Fellowship literary works were the Plaintiff's own property by among other acts:

- (a) the announcement at the 1991 World Service Conference, contrary to representations made to the Trust Document Working Group and without prior publication to the Fellowship as MOTIONS intended for group conscience approval,

of affirmations to be treated as motions by the Plaintiff, to confirm claimed ownership and enforcement right by the Plaintiff to the Narcotics Anonymous literary works, (See Motion and Comments on page 21 through 26 of the 1991 World Service Minutes, attached hereto as Exhibit "H");

- (b) the extensive period of comment by the Plaintiff and its legal counsel at time of the presentation of the aforesaid affirmations giving legal analysis and opinions contrary to any established right of literary work ownership and suggestive of other contrary claims being illicit and improper resulting in the approval by an uninformed and misled voting body of the Fellowship of Narcotics Anonymous, (Refer to audio presentation of recorded session of World Conference); and
- (c) the filing and registration with the United States Copyright Office on or about May 22, 1991, of certain Amplifications of Copyright Forms, (see Exhibit "I", Form CA Copyright Registrations), in an attempt to correct prior improper registrations being the subject matter of this pending legal action and purpose behind the Trust Document Working Group activities.

14. Also, during this same time, and specifically contrary to the expressed terms of the Agreement and Court Order, the Plaintiff knowingly, willingly and in bad faith violated the said Agreement and Order by submitting comments to the Fellowship of N.A. about the three required Literary Work Motions in a blatant attempt to persuade and to influence a negative vote on the Literary Work Motions:

- (a) by publishing and distributing to the voting participants some thirty (30) days in advance of the 1991 World Conference, a WSO Board of

Director's Report containing improper and persuasive comments about the claimed copyrights held by the Plaintiff and the acts of the Defendant in challenge thereof with intent to influence negative votes on the agreed Literary Work Motions; (See Exhibit "J", World Service Office Narcotics Anonymous 1991 Annual Report);

- (b) by speaking with members of the Fellowship, including voting Regional Service Representatives, Trustees and Directors and other voting participants about the Motions and effects thereof, with comments being made with intent to influence negative votes on the Literary Work Motions;
- (c) by issuing to the Fellowship a written "REPORT CONCERNING THE MOTION FOR A LOW-COST BASIC TEXT" (See Exhibit "J" pages 14-17), placing financial fear in the effect of the production of a low cost basic text;
- (d) by mailing letters to members of the Fellowship, including Voting Participants, within days after the January 4, 1991 Agreement making unfair comment about copyright infringement of the N.A. literary work, (see letters of January 17, 1991; February 1, 1991; May 13, 1991 and May 14, 1991 by the Plaintiff attached as Exhibit "K");
- (e) by allowing the Executive Director of the WSO and its legal counsel for the WSO, Theresa Middlebrook, Esquire to appear before the 1991 World Service Conference and present for some 2 1/2 hours their explanations and comments to the voting body about the Affirmation motions on literary right ownership and comments about enforcement claims prior to the final votes on the Literary Work Motions, (See Exhibit "H", Pages 21 through 26, and refer to audio presentations of

recorded sessions); and

- (f) by setting forth in the published 1991 World Service Conference Agenda Report, (See Exhibit "E", Pages 21 through 26), comments about the N.A. Fellowship literary works and that the publication alleged to be from the Defendant was "illicit".

15. As a result of the improper and violative conduct by the Plaintiff, including by its legal counsel, the aforesaid Motions were denied and, despite objection raised by your Defendant and other concerned members of the Fellowship including those in the Trust Document Working Group, the Plaintiff failed to take any steps of corrective action except as stated hereafter in an effort to continue misleading the Defendant.

16. After said 1991 World Service Conference, the Plaintiff continued to lead the Defendant and the other members of the Trust Document Working Group to believe that the approval of the Literature Trust Document would "supersede" the result of the tainted voting procedure and comments on the Literary Work Motions and not to object to this Court but work with the Plaintiff for a total and harmonious resolution to the copyright and tradename issues. (See Exhibit "L" - Memo from Stu Toordeman as well as the representations and assurances given by Stu Toordeman and George Hollahan during the Trust Document Working Group telephone conferences, Exhibits "F" and "G").

17. Thereafter, significant expressions of objections and concerns were voiced by members of the Trust Document Working Group to the Plaintiff about the proposed Fellowship Intellectual

Property Trust; (See Exhibit "M" - Letters of input from Working Group Members).

18. In response thereto, on June 21, 1991, unilaterally and without consent of the members of the Trust Document Working Group, the Plaintiff together with the Board of Trustees of the WSC and the WSC Administration, announced to the Defendant and the members of the Trust Document Working Group by Memo from the Chairman of the Board of Directors, that the next scheduled conference call for the Trust Document Working Group, scheduled for June 28, 1991, would not be held and the responsibility of the Trust Document would be turned over to the WSC Administration. (See Memo of June 21, 1991 attached as Exhibit "N" and note that this formal announcement followed the completion by the Plaintiff of the Affirmation Motion, Denial of the Literary Work Motions and registration of the copyright Amplifications).

19. The Plaintiff set forth the reason for this absolute reversal of cooperation as being that the Plaintiff "lacked funds for the call", (See Exhibit "N") despite having reported earnings on the Basic Text, (just one of many literary works sold by the Plaintiff), over the Eight (8) month period of January, 1990 to August, 1990 in excess of \$1.246 Million Dollars. (See Exhibit "O").

III. COMPELLING CONCERNS

20. The Plaintiff, despite numerous objections by the Defendant and other members of the Trust Document Working Group, proceeded to publish to the Fellowship a final draft of the

Fellowship Intellectual Property Trust in the Conference Agenda Report released in January, 1992 for approval by the Fellowship at the April, 1992 World Conference without consideration and implementation of any input from the Defendant or members of the Trust Document Working Group. (See Exhibit "P").

21. The Plaintiff, despite prior assurances that the Fellowship Intellectual Property Trust Document would be circulated for review and comment by the Fellowship for a period of no less than one (1) year, is attempting to obtain Fellowship approval of a legal document without fair comment as to its effect and solely based on representations and assurances by the Plaintiff that the legal document is appropriate. (See Comment, Exhibit "Q", Page 15 - 17).

22. The Comments by the World Service Board of Trustees (Exhibit "Q, Page 16) references the suspect ownership Affirmations, (now referred to as Motions), approved at the 1991 as proof of ownership and exclusive rights associated therewith of the Narcotics Anonymous Literary Works and only a passing reference to the concerns of members of the Fellowship Trust Group without any detail as to what those concerns involve.

23. In addition to the comments, (Exhibit "Q"), the proposed Fellowship Intellectual Property Trust is prefaced by a series of Explanatory Notes, (Exhibit "R"), which are inaccurate, misleading and do not provide to the Fellowship full disclosure and information of concerns and issues raised by the Defendant and the informed members of the Trust Document Review Group.

24. The Plaintiff has scheduled the 1992 World Service

Conference for April 25 through May 2, 1992 and has requested a vote at that time for final approval of the Fellowship Intellectual Property Trust Document by the voting participants without the voting participants on behalf of the Fellowship having been afforded the opportunity for legal counsel, adequate review and informed fellowship conscience.

25. The Plaintiff is requesting the approval of a legal document intended to resolve the ownership of Fellowship Literary Works by a unilaterally prepared and suggestive document contrary to the letter and the intent of this Court's Order of January 4, 1991 and continuing representations and assurances by the Plaintiff.

26. The Plaintiff by the Chair of the Board of Directors, has represented to members of the Fellowship at the March 1992 South Florida Spring Service Break, that the Trust Document as proposed met the satisfaction of the Trust Document Working Group. (Audio tape of presentation with transcript to be made available).

27. The proposed Fellowship Intellectual Property Trust, is written as a self serving legal instrument that is clearly unfair, unconscionable and unlawful on its face in respect to among other matters those concerns expressed below:

(a) The Trustor is the World Service Conference, (WSC), who is not the holder of the alleged copyright registrations and fails to include the Fellowship of Narcotics Anonymous as the Trustor as is necessary to resolve all claims and disputes over the ownership of the Narcotics Anonymous Literary Works;

(b) The Trust Document allows the Trustor and Trustee to generate and agree upon Trust Operational Rules without review, approval or concern given to the Beneficiaries, being the Fellowship membership, (Article IV);

(c) The Trust Document fails to require that the Trustee abide by the Twelve Traditions of Narcotics Anonymous;

(d) The Trust Document fails to provide for a Trustor upon dissolution of the WSC, (the probable result of a proposed motion to approve the Twelve Concepts of Narcotics Anonymous also being presented for approval at the 1992 Conference);

(e) The Trust Document provides that the administration of the Trust is solely for the interest of the Beneficiary and the Trustor however provides for no provision for resolution of dispute between the WSC and the Fellowship, (Article V, Section 1.(3));

(f) The Trust Document prohibits loans to the Beneficiaries but not to the Trustor, (Article V, Section 5);

(g) The Trust Document is revocable by the Trustor without any standards or protective measures for the Beneficiaries, (Article VI);

(h) The Trust Document removes jurisdiction over federal copyright, tradename and trademark issues from the Federal Court and grants exclusive jurisdiction over all trust disputes to the Superior Court of the State of California, making it financially impossible for a challenge as to the compliance therewith, (Article VIII);

(i) The Trust Operational Rules provides that the Trustee is serving as a Fiduciary to the benefit of the Trustor, but not to the Beneficiaries, (Article IV, Section 3);

(j) The Trust Operational Rules provide contradictory statements about compensation to the Trustee, stating that the Trustee shall serve without compensation but that compensation can be paid for services rendered, (Article IV, Section 4);

(k) The Trust Operational Rules provides only for annual internal review and does not require an independent certified public account audit, except for every 5 years or unless paid for by the members of Narcotics Anonymous (Article IV, Section 10);

(l) The Trust Operational Rules provides for an annual Trustee Report to be delivered to the Fellowship, not Ninety (90) days prior to the Annual Conference as done with the Conference Agenda Report to allow review and by the Fellowship comment, but only "at or before its annual meeting" (Article IV, Section 12), and

(m) Other and numerous reasons of concern as expressed in letters of input from members of the Trust Document Working Group and other Fellowship members and Groups as attached hereto as Exhibit "S".

IV. NECESSITY FOR IMMEDIATE RELIEF

28. The Plaintiff, by committing the acts and omissions stated herein, as well as other acts yet unknown, has clearly violated and intends to further violate the terms and conditions of this Court's Order and Agreement of January 4, 1991 as agreements and representations made by Plaintiff in carrying out

the specific acts required of the Plaintiff thereunder.

29. The Defendant, (as well as other intended additional Defendant parties to this action being several aggrieved members of the Trust Document Working Group and objectors to the Plaintiff's claim of Literary Work Ownership), have and will be severely prejudiced by the continuing actions of the Plaintiff. (See Exhibit S - Objection Letters to Trust)

30. Your Defendant has complied with the obligations of him under the Court Order and Agreement "100%" as admitted to by the Plaintiff. (See Exhibit "G").

31. Your Defendant has no other adequate remedy at law and he, as well as all members of the Fellowship of Narcotics Anonymous, will be irreparably injured as a result of the Plaintiff's misrepresentations, improper and unlawful actions if not corrected by this Court.

32. Granting the Defendant the requested relief of staying the approval of the proposed Fellowship Literature Trust Document will be in the best interest of all parties, will not jeopardize or prejudice any rights of the Plaintiff, will provide adequate time for proper review by the Fellowship of the terms and conditions of the trust including professional review, and will best lead towards furthering a full and complete resolution of the parties ongoing dispute over ownership and control of Fellowship literature and will further the spiritual message of the Fellowship program and its Twelve Traditions.

33. The opportunity for the Fellowship to obtain approval of a Motion to Table the Motion #8 to approve the Trust

at the World Service Conference is remote and highly unlikely due to the control of the agenda, seating recognition, voting rulings and comment recognition from the floor by the WSO and WSC Board of Trustees and WSC Administrative Committee.

WHEREFORE, for just causes, compelling reasons and for the appropriate resolution of this pending copyright dispute, the Defendant prays this Honorable Court to:

(a) enter an appropriate corrective order to enforce the Court's Order of January 4, 1992 and Agreement of said same date between the parties, as is just and proper including but not limited to the relief of a Preliminary Injunction staying the vote on the 1992 Conference Agenda on Motion #8 for a period of no less than one (1) year together with the formation of a WSO funded beneficiary advocacy committee to review the Fellowship Intellectual Property Trust Document and give unbiased and independent advice and comment to the intended beneficiaries prior to further proceedings by the Plaintiff to have the Fellowship approve or disapprove the proposed Fellowship Intellectual Property Trust Document; or to

(b) vacate the Order of January 4, 1992 and Order and Direct, after the filing of the Defendant of a responsive pleading and joinder of Additional Defendants, that this matter be restored to the trial docket to proceed to final resolution, and

(c) such other relief as is just and proper, including adjudication of Contempt of the Plaintiff and the award of reasonable compensation to the Defendant for the cost and expenses of enforcing the 1991 Court Order, Agreement and agreements made

between the parties pursuant and in furtherance thereto.

Respectfully submitted,

BY:

A handwritten signature in black ink, appearing to read "Greg B. Emmons", written over a horizontal line.

GREG B. EMMONS, ESQUIRE
ATTORNEY FOR DEFENDANT
ATTORNEY I.D. #28110

VERIFICATION

The averments or denials of facts contained in the foregoing Motion are true based upon the signer's personal knowledge or information and belief. If the foregoing contains averments which are inconsistent in fact, signer has been unable after reasonable investigation, to ascertain which of the inconsistent averments are true, but signer has knowledge or information sufficient to form a belief that one of them is true. This verification is made subject to the penalties of all applicable laws relating to unsworn falsification to authorities.

DATE: 4-20-92

David Moorhead
DAVID MOORHEAD

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

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Plaintiff	:	
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vs.	:	MOTION TO ENFORCE
	:	OR VACATE
DAVID MOORHEAD,	:	
	:	
Defendant	:	

EXHIBIT	<u>LIST OF EXHIBITS</u> DESCRIPTION
A	SETTLEMENT AGREEMENT OF JANUARY 4, 1991
B	COURT ORDER OF JANUARY 4, 1991 APPROVING SETTLEMENT AGREEMENT AND RETAINING JURISDICTION FOR ENFORCEMENT PURPOSES
C	COURT ORDER OF JANUARY 24, 1991 PLACING MATTER IN CIVIL SUSPENSE FILE
D	"OUR COMMITMENT TO UNITY" of JANUARY 15, 1991 TO RESOLVE LONGSTANDING DISPUTE
E	WORLD SERVICES CONFERENCE AGENDA REPORT 1991, pages 21-32
F	TRUST DOCUMENT WORKING GROUP, TELEPHONE CONFERENCE # 1 - PARTIAL TRANSCRIPT
G	TRUST DOCUMENT WORKING GROUP, TELEPHONE CONFERENCE # 2 - PARTIAL TRANSCRIPT
H	MINUTES, WORLD SERVICE CONFERENCE 1991 pages 21-26

EXHIBITS

DESCRIPTION

I	5-22-91 FORM CA UNITED STATES COPYRIGHT AMPLIFICATIONS (6)
J	WORLD SERVICE OFFICE NARCOTICS ANONYMOUS 1991 ANNUAL REPORT, page 1, 4-8 & 14-17
K	WSO LETTERS TO FELLOWSHIP MEMBERS WITH COMMENTS ON LITERARY ISSUES PRIOR TO VOTE ON LITERARY WORK MOTIONS
L	TRUST DOCUMENT WORKING GROUP MEMORANDUM FROM STU TOOREDMAN TO WORKING GROUP
M	LETTERS OF OBJECTIONS TO THE PROPOSED DRAFT OF THE TRUST FROM MEMBERS OF THE TRUST DOCUMENT WORKING GROUP SUBMITTED TO WSO BUT NOT RESPONDED TO OR MADE KNOWN TO THE FELLOWSHIP
N	JUNE 21, 1991 MEMO FROM WSO CHAIR OF BOARD OF DIRECTORS UNILATERALLY TERMINATING THE TRUST DOCUMENT WORKING GROUP DUE TO LACK OF FUNDS
O	PRELIMINARY ANALYSIS OF BASIC TEXT SALES FOR JANUARY - AUGUST 1990 REPORTING SALES OF \$1.246 MILLION DOLLARS
P	PROPOSED FELLOWSHIP INTELLECTUAL PROPERTY TRUST DOCUMENT AS PUBLISHED
Q	COMMENT SECTION IN CONFERENCE AGENDA REPORT ON TRUST DOCUMENT
R	EXPLANATORY NOTES TO TRUST DOCUMENT
S	FELLOWSHIP OBJECTION LETTERS TO TRUST
T	DECLARATIONS FROM FELLOWSHIP MEMBERS

SEE SEPARATE DOCUMENT OF
EXHIBITS

EXHIBIT	DESCRIPTION
I	5-23-91 FORM CA UNITED STATES COPYRIGHT AMPLIFICATIONS (5)
J	WORLD SERVICE OFFICE NARCOTICS ANONYMOUS 1991 ANNUAL REPORT, page 1, 4-8 & 14-17
K	WFO LETTERS TO FELLOWSHIP MEMBERS WITH COMMENTS ON LITERARY ISSUES PRIOR TO VOTE ON LITERARY WORK MOTIONS
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