

EXHIBIT "T"

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	:	
	:	
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



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Narcotics Anonymous : Civil Action No. 90-7631  
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Plaintiff :  
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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

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.