

Re: Petition No. 114-1937

Clerk of Court  
Orphans Court Division  
Court of Common Pleas of Delaware County  
201 W Front Street  
Media PA 19063-2708

25 October 2005

Dear Clerk of Court:

Enclosed for filing is the (a) Answer and Opposition in the above-case, with a supporting Affidavit and Exhibit, (b) Affirmative Defenses, (c) Request for Jury Trial, and a Certificate of Service. This filing is in addition to, enlargement of, supplement to, and/or replacement of, that abbreviated response or objection initially filed by our Executive Secretary, Jim Hedges, under the circumstances of the belated receipt of the Trustee's Petition at issue.

Three sets of documents are enclosed, one original for the record, one copy for the judge, and one copy for date-stamping and returning in the enclosed pre-addressed postage pre-paid envelope.

Thank you. Your assistance is appreciated.

Respectfully,

Leroy J. Pletten  
Secretary  
Prohibition National Committee  
8401 18 Mile Road #29  
Sterling Heights MI 48313-3042  
586-739-8343

Enclosures:  
3 sets of documents, a/s  
1 return postpaid envelope

IN THE COURT OF COMMON PLEAS  
OF DELAWARE COUNTY, PENNSYLVANIA  
ORPHANS' COURT DIVISION

No. 114-1937

RESIDUARY TRUST UNDER WILL OF  
GEORGE F. PENNOCK FOR THE  
BENEFIT OF THE PROHIBITION PARTY

---

ANSWER AND OBJECTIONS TO PETITION FOR LEAVE TO MAKE  
DISTRIBUTION TO INCOME BENEFICIARY AND TO DIRECT THE  
REFUND OF PRIOR INCORRECT DISTRIBUTION

---

The Prohibition National Committee, by Secretary Leroy J. Pletten, answers and objects to the Petition herein, and for its Answer and Objections, states as follows:

1. ADMIT all aspects of the will and codicils.
2. ADMIT all aspects of the terms of the will.
3. ADMIT all aspects of the appointment of trustee.
4. ADMIT as to the Trustee paying the fifty percent of the annual income as stated. DENY as to Earl F. Dodge being the National Chairman of the Prohibition National Committee (hereinafter "PNC), for the reason that his four year term from 1999-2003 expired in 2003, and he was not re-elected at any meeting or Convention of which due notice was given and a quorum participated. (At the real convention by the majority, his status was changed from Chairman to "Chairman Emeritus.")
5. ADMIT as to notifying the Trustee, the Petitioner herein.
6. Neither ADMIT nor DENY that former Chairman Earl F. Dodge made the alleged representations to the Trustee (at its Exhibit B) and aver that the documents are the best evidence of their contents. DENY the truth of the claims of "former members" as their status was and is current members, indeed a majority of PNC membership. DENY the truth of the allegations therein as conclusionary and contrary to PNC By-laws, parliamentary procedure, and pertinent court precedents (listed in the undersigned's correspondence to Petitioner's Robert L. Altimore, Jr., filed as Petitioner Trustee's Exhibit C) contemplating or requiring

notice of meetings and a quorum at same for validity. DENY the Trustee's summation of the PNC position; it is not that Earl F. Dodge of the "Dodge group" was "illegally elected" but that he was as a matter of law not "elected" at all, due to (a) the lack of notice for Dodge's private in-home gathering held for a small group of specially invited attendees, excluding members Dodge personally disfavored, and (b) the lack of a quorum (seven people alleging attendance vs 27 member names admitted against interest by Trustee Exhibit B, pages P.045-P.051 and P.057 and P.059), for the small minority meetings held at Dodge's home and church, which purported to constitute a "convention" that "elected" Dodge, and indeed, the undersigned Leroy J. Pletten as "Secretary." DENY the statement by Jerry Kain (Trustee Exhibit B P.050) as false or misleading; Kain was in fact not present, and is not so represented by the purported "Minutes," P.057 and P.059. DENY the statement by Paul Scott (Trustee Exhibit P.045) claiming to be Secretary as false and contradicted by the purported "Minutes" (Trustee Exhibit B, P.057, paragraph 4), and by the minority "Dodge group's" own announcement against interest, that the undersigned Leroy J. Pletten, not Scott, is Secretary (Trustee Exhibit B, P.021, *The National Statesman*, page 1, column 1). (Said documents estop the "Dodge group" from arguing to the contrary.) DENY the accuracy of the remaining statements (by Karen Thiessen, Howard Lydick, Earl Dodge, Margaret Shickley, and Faith Nelson) insofar as they purport to rebut the position and choices of the majority decisions on PNC business including membership. DENY the purported "Minutes of the Quadrennial Meeting" (P.057 and P.059 of Trustee's Exhibit B), and aver that said document has flaws or leads to issues including but not limited to the fact that they (a) reflect no quorum as evident by its citing at least 27 names whereas *prima facie* only seven persons (at P.045-P.051) including Earl F. Dodge's daughters Karen Thiessen (P.046) and Faith D. Nelson (P.051), signed statements alleging attendance (significantly, not including the undersigned), i.e., *prima facie* not a quorum by their own against-interest documentation of 27 members per P.057 and P.059; (b) reflect non-compliance with the Bylaws requirement for "a biennial meeting of the entire membership of the National Committee" (Trustee Exhibit B, P.053, "Meetings, Section 1 Biennial Meeting"); (c) cite different types of meetings, (i.e. "executive," "Platform," "National Committee," and "convention") all in one set of "Minutes" without adequate-for-minutes data; (d) fail to reference the tape recording of said meetings; (e) are *ultra vires* i.e., unauthorized by the Secretary (the undersigned Pletten), and (f) are unsigned by anyone and most especially by the authorized person, the undersigned. ADMIT that the September 2003 PNC meeting giving rise to the real "nominating convention" of which proper notice was given pursuant to the Bylaws [Trustee Exhibit P.053-p.054, "Meetings" article, especially "Section 1, Biennial Meeting," and "Section 3, Call of Committee" pursuant to advisory from Earl F. Dodge] and a quorum was present, in fact elected the undersigned Pletten as Secretary, and declined to re-elect Mr. Dodge as Chairman, choosing Don Webb instead.

7. ADMIT the payment suspension, and ADMIT that representations on behalf of the PNC majority provided information to the Trustee attesting to the authenticity of the one, continuing, indivisible organization. Neither ADMIT nor DENY what the minority "Dodge group" provided, and aver that the documents are the best evidence of their contents. Certain documents at Trustee Exhibit B constitute a surprise as the Trustee had previously been

unresponsive to PNC pleas for a copy of same. Said unresponsiveness obstructed PNC ability to respond to unknown charges and false or otherwise suspect documents being presented by the minority dissident “Dodge group” to the Trustee (documents deemed contrary to laws such as 18 USC § 1001, § 1341, and § 1961, as now evident). DENY that the dissident minority “Dodge group” has authority to contact the Trustee, for reasons including that no actual officers including the undersigned Secretary has delegated or authorized such contact. No further meetings than as alleged in Trustee’s Exhibit B under any pretext by the dissident minority “Dodge group” are known to have been held; the undersigned has received no notice of same. DENY that Howard Lydick is the PNC attorney for the same reasons, and aver that *prima facie* the “Minutes” (Trustee Exhibit B, P.057 and P.059) cite no such title for Lydick, and DENY Lydick’s being authorized to file anything to Petitioner Trustee. The fact that Trustee’s Exhibit B, P.021 (“*The National Statesman*, page 1, column 1), and P.057 (“Minutes,” fourth paragraph) by the minority “Dodge group,” cite the undersigned Pletten as Secretary estops them from usurping the correspondence role).

8. Neither ADMIT nor DENY current value of the Trust’s principal, as a matter in the Trustee’s knowledge, and aver that its Exhibit D documentation is the best evidence of same.

9. DENY that the minority “Dodge group” was ever the organization to which any payments were made. The actual organization is one, indivisible, continuing, the same as always. DENY the claim or innuendo that the cited Bylaws (Trustee Exhibit B) are not the Bylaws of the mislabeled “Webb group” (in fact the PNC majority), and DENY that Tax Identification Number 35-205-7875 is not the PNC Tax Number. DENY that said Tax Number is or ever was the Tax Number of the “Dodge group.” The “Dodge group” is simply a disgruntled dissident minority, fraudulently pretending (in apparent violation of laws including but not limited to 18 USC § 1001, § 1341, and § 1961 [federal laws against falsification, mail fraud and pertinent concerted action via predicate acts] and presumably laws of Pennsylvania and/or other states wherein the documents originated), that the majority “organized a new group” (Trustee Exhibit B, P.045-P.051, paragraph 4). In parliamentary procedure, the majority vote governs, is controlling, and does not “organize a new group” (as the majority followed the “Meetings” article especially sections 1 and 3, cited in Trustee Exhibit P.063-P.064). Following said sections does *not* “organize a new group” but rather carries on the business of the existing PNC despite a Chairman’s refusal to convene requisite meetings. The PNC as run by majority control is one, indivisible, continuing, the same as it always was. The dissident “Dodge group” is not an organization, but a minority group who refuse to accept majority rule. The actual PNC organization is thus mislabeled by the Trustee’s Petition as the “Webb group.” The actual PNC organization, of which the undersigned Pletten is secretary (and the “Dodge group” is estopped from denying this), opposes any so-called refund; the payments by the Trustee as made were correct. It is arbitrary, capricious and a violation of the Trustee’s fiduciary duty pursuant to the Pennock Will, Codicils, and Trust, for the Trustee to offer no explanation as to how it summarily concludes that a dissident minority faction constitutes the organization, and that the majority control rule is somehow nullified. The Petitioner Trustee cites no parliamentary procedure, rule of law, or court case law precedents for such extraordinary claim (arising from its being

victimized by the “Dodge group’s” false, *ultra vires* claims). The Trustee disregards the many pertinent court precedents the undersigned Secretary Pletten so laboriously provided (to try to head off the now apparent fraud against the PNC via the “Dodge group” fraud on the Trustee), to the Trustee’s Robert L. Altimore, Jr., cited in Trustee’s own Exhibit C (the five and six page emails from the undersigned Pletten).

WHEREFORE the Prohibition National Committee respectfully requests that the Court:

(1) STRIKE Trustee’s Exhibit B for reasons including its containing a range of flaws including unsworn, even unsigned matter, matter lacking-personal-knowledge, *ultra vires*, matter, as detailed above, and /or

(2) ORDER, as preservation of evidence, the immediate filing in this Court of the tapes of the June 2003 “Dodge group” meetings made by then outgoing Secretary Margaret S. Shickley, the undersigned’s predecessor, and/or

(3) DENY Trustee’s mislabeled request #1 for what is in essence leave or permission to pay the dissident minority “Dodge group” faction, when it (the Trustee) was in fact, correctly making the payments to which it alludes (the fifty percent of the net income attributable to the national organization of the Prohibition Party) to the correct organization, the PNC, with William Bledsoe (P.O. Box 3554, Milton Florida) as Treasurer, until it (the Trustee) summarily, arbitrarily, and capriciously stopped doing so (as the Trustee admits in its Paragraph 7), and now, by the guise of mislabeling the minority “Dodge group” as though they are the totality of the PNC, seeks to make payments to said minority dissidents, and/or

(4) DENY Trustee’s mislabeled request to seek refund from the correct organization, the PNC, pursuant to the Trustee’s avowed or actual intent to start making payments to the minority dissidents “Dodge group,” for the foregoing reasons and inasmuch as the funds have already been disbursed by the PNC to promote the Prohibition Party pursuant to the purpose of the Pennock Trust, and/or

(5) ORDER the Trustee to acknowledge that *prima facie*, the very documents it files as its Exhibit B show at least 27 names as members whereas only seven signed statements (Exhibit B, P.045-P.051) purport attendance, *prima facie* not even a quorum and definitely not “the entire membership” as mandated, and/or

(6) ORDER the Trustee to make the thus far missed payment to the PNC with a mailing address of Treasurer William Bledsoe, P.O. Box 3554, Milton, Florida, thus enabling the PNC to retain the services of an attorney for any further proceedings herein, and/or

(7) ORDER, in the alternative, the appointment of an attorney for the organization for representing same in these proceedings, with payment to be made from the Trust; and/or

(7) DISMISS the herein Petition with prejudice as on its face, *prima facie*, showing the absence of a quorum (i.e., referring to the seven of 27 names, Exhibit B, P.057, P.059, and P.045-P.051) for the purported meetings upon which to base its claims whereby it is burdening this court with a frivolous litigation, and assess appropriate penalties, if any, as may be provided by law, disciplinary code, and/or court rules for having filed said Petition without having done the due diligence of even having counted or read the numbers (seven of 27) in the very material it filed, and/or

(8) ORDER other or additional relief, including leave to correct any irregularities herein as may have occurred due to the late receipt of the Petition herein barely days before due date, as may be appropriate under the circumstances.

Respectfully,

Dated: 25 October 2005

By: \_\_\_\_\_  
Leroy J. Pletten  
Secretary, Prohibition National Committee  
8401 18 Mile Road #29  
Sterling Heights MI 48313-3042  
(586) 739-8343

IN THE COURT OF COMMON PLEAS  
OF DELAWARE COUNTY, PENNSYLVANIA  
ORPHANS' COURT DIVISION

No. 114-1937

RESIDUARY TRUST UNDER WILL OF  
GEORGE F. PENNOCK FOR THE  
BENEFIT OF THE PROHIBITION PARTY

---

ANSWER AND OBJECTIONS TO PETITION FOR LEAVE TO MAKE  
DISTRIBUTION TO INCOME BENEFICIARY AND TO DIRECT THE  
REFUND OF PRIOR INCORRECT DISTRIBUTION

---

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE  
(Failure to State a Claim)

The Petition fails to state a Cause of Action upon which relief can be granted.

SECOND AFFIRMATIVE DEFENSE  
(Fraud)

Petitioner's claims are barred in whole or in part by the "Dodge group" fraud.

THIRD AFFIRMATIVE DEFENSE  
(Consent, Waiver, Estoppel and Excuse)

By its acts and omissions, Petitioner and/or the "Dodge group" have consented to and have waived, and are estopped from complaining about, any alleged act or omission of the Prohibition National Committee, and the Prohibition National Committee is excused from any liability to Petitioner and/or the "Dodge group" for any alleged act or omission of the Prohibition National Committee.

FOURTH AFFIRMATIVE DEFENSE  
(Good Faith)

Petitioner is barred from recovery for the reason that the alleged acts and omissions, if any, of the Prohibition National Committee were made in good faith by the majority after the exercise of reasonable care by same.

FIFTH AFFIRMATIVE DEFENSE  
(Non-Fulfillment of Conditions Precedent)

Petitioner is barred from any proceeding adversely impacting the Prohibition National Committee because conditions precedent to the existence and the purported rights being sought on behalf of the Dodge minority faction are *prima facie* non-existent absent quorum, without even reaching the issue of lack of notice to disfavored members, excluding them from attendance.

RESERVATION OF RIGHT

The Prohibition National Committee reserves the right, in view of the late receipt of the underlying Petition by Trustee, barely days before due date, to, upon completion of its investigation and discovery, file such additional or amended pleadings and/or defenses as may be appropriate.

WHEREFORE, the Prohibition National Committee moves that the Petition be dismissed with prejudice, and that judgment of no cause of action be entered in its favor together with its costs and attorneys' fees, if any, as may be allowed by law.

Respectfully,

Dated: 25 October 2005

By: \_\_\_\_\_  
Leroy J. Pletten  
Secretary, Prohibition National Committee  
8401 18 Mile Road #29  
Sterling Heights MI 48313-3042  
(586) 739-8343



IN THE COURT OF COMMON PLEAS  
OF DELAWARE COUNTY, PENNSYLVANIA  
ORPHANS' COURT DIVISION

No. 114-1937

RESIDUARY TRUST UNDER WILL OF  
GEORGE F. PENNOCK FOR THE  
BENEFIT OF THE PROHIBITION PARTY

---

ANSWER AND OBJECTIONS TO PETITION FOR LEAVE TO MAKE  
DISTRIBUTION TO INCOME BENEFICIARY AND TO DIRECT THE  
REFUND OF PRIOR INCORRECT DISTRIBUTION

---

REQUEST FOR JURY TRIAL

The Prohibition National Committee, by its Secretary, hereby requests a Trial by Jury.

PNC reserves its rights with respect to the matter of Trial by Jury pending disposition of above requests related to appointment of an attorney.

Respectfully,

Dated: 25 October 2005

By: \_\_\_\_\_  
Leroy J. Pletten  
Secretary, Prohibition National Committee  
8401 18 Mile Road #29  
Sterling Heights MI 48313-3042  
(586) 739-8343



7. PNC Bylaws contemplate a quadrennial “nominating convention” (Trustee Exhibit B, P.052, “Membership and Service, Section 3 Period of Service”) and require “a biennial meeting of the entire membership of the National Committee” (Trustee Exhibit B, P.053, “Meetings, Section 1 Biennial Meeting”), thus providing for certain other meetings more often than merely “quadrennial.”

8. Said Bylaws provide for approximately four year terms (Trustee’s Exhibit B, P.052, “Membership and Service,” “Section 3 Period of Service” and P.053, “Officers and Committees,” “Section 5, Period of Service”). They also, in “Meetings,” “Section 3, Call of Committee,” enable convening PNC meeting without Chairman consent.

9. The Quadrennial Convention at issue was to have been held around June 2003, i.e., about four years after the last one, 1999, and about two years after the 2001 PNC meeting.

10. Having familiarity with, and using, parliamentary procedure over a period of some decades, I recognize that members are entitled to adequate notice as a matter of constitutional, legal, and/or property right, due process, and that pertinent court precedents have so ruled.

11. I recognize that Earl F. Dodge did not send notices adequate for attendance to certain members in disfavor with him, both (a) because he told me so and told others in my presence likewise, and (b) because certain excluded members complained to me of having not received adequate notice with respect to the purported meetings.

12. Pursuant to my parliamentary procedure experience, I recognized that Earl F. Dodge was (a) refusing to schedule the “biennial meeting of the entire membership of the National Committee,” and quadrennial “nominating convention,” but was (b) instead setting up a private, essentially secret, meeting of selected members in his home and church, constituting in numbers less than a quorum, and denying some of “the entire membership” their rights to proper notice for purposes of attendance.

13. Instead, after-the-fact, the small group meetings’ results (cited in Petitioner’s Exhibit B, “*The National Statesman*,” P.021, starting p 1) were announced as *fait accompli*.

14. Pursuant to my parliamentary procedure experience, I deny validity of the small private, by-invitation-only, meetings that Earl F. Dodge conducted in his home and church, held on the purported basis of including all requisite meetings, but which the dissident minority faction, significantly, does not dare label as the “biennial meeting of the entire membership of the National Committee” in the purported “Minutes” P.057 and P.059 (Trustee’s Exhibit B).

15. I do not recognize the said private meetings as official or genuine PNC meetings, whether deemed biennial or quadrennial.

16. I find on review of the Petition that its Exhibit B, “Minutes” P.057, lists at least 27 member names (not to mention unlisted ones in disfavor with Dodge), whereas signatories (at

P.045-P.051) claiming attendance, truthfully or not, constitute only seven names, including Karen Thiessen (P.046) and Faith D. Nelson (P.051), Earl Dodge's daughters. Based on my parliamentary procedure experience, I recognize that 7 of 27 is *prima facie* neither a majority, a quorum, nor in compliance with the Bylaws mandate of "a biennial meeting of the entire membership of the National Committee" (Trustee's Exhibit B, "Minutes" P.053, in essence, an admission against interest of the "Dodge group.")

17. I know that Jerry Kain did not in fact attend, so deny his misleading statement (in Trustee Exhibit B, P.050) that may seek to give the impression otherwise.

18. I know that Paul B. Scott was not in fact elected Secretary, and so deny his claim of "Office Held" (in Trustee Exhibit B, P.050). I find that it contradicts the purported "Minutes" (in Trustee Exhibit B, P.057, paragraph 4), and announcement in *The National Statesman*, p 1 column 1 (in Trustee Exhibit B, P.021).

19. I find that Howard L. Lydick is not even listed in the "Minutes" P.057 (Petitioner's Exhibit B) as a PNC member from any State (see the "Membership by State" section there), yet he is asserted to be Vice-Chairman without explaining how this is possible.

20. I find that the dissident "Dodge group" minority faction allegations (in Trustee's Exhibit B, P.045-P.015) as to events at the real Quadrennial Convention in September 2003 are not alleged to be based on personal knowledge, for the reason that they were not present there and so have no personal knowledge to back up their assertions.

21. Based upon my aforesaid experience, and my personal dealings with the people at issue, I do not find or recognize Earl F. Dodge to be the official Chairman. (He was changed in status to "Emeritus" at the real "nominating convention"). I consider his actual "Chairman" term as what it was in 1999 elected to be, the 1999-2003 term that *prima facie* ended in 2003.

22. I know that the real "nominating convention" was convened in September 2003, pursuant to the Bylaws "period of four years" guidance (Trustee Exhibit B, Bylaws, P.052-P.053 and P.054), the aforesaid "Membership and Service" article, "Section 3 Period of Service," and the "Meetings" article, "Section 1 Biennial Meeting" and "Section 3 Call of Committee," with my approval, in view of the facts and circumstances, including then Chairman Dodge's refusal to convene the requisite meetings. I attended both sets of meetings, so have personal knowledge of the events at both.

23. I deny the claim (in Trustee Exhibit B, P.045-P.051) that the majority meeting in September 2003 "organized a new group." I find and recognize that in standard parliamentary procedure and business law, the majority vote governs, is the controlling matter, and does not "organize a new group," thus, that the PNC now controlled by the majority is one, indivisible, continuing organization, the same as always. The minority "Dodge group" faction of the PNC organization is simply that, a disgruntled dissident minority including Dodge, fraudulently opposing majority rule and action, and by contacts including by mail, misleading the Trustee

into disregarding pertinent facts including even those in its admitted written possession (Exhibits B and C), parliamentary procedure, and pertinent court precedents as listed in my emails to Robert L. Altimore, Jr. (Trustee Exhibit C, 5 and 6 page documents).

24. I find that the dissident minority’s claims that the “Webb group” “organized a new group” are a fraud made without personal knowledge of the facts as they were not present, and were made with intent to obstruct the operation of the Bylaws (Trustee Exhibit B, P.053, “Meetings,” “Section 1 Biennial Meeting,” and “Section 3, Call of Committee”), the procedures actually invoked, after then Chairman Dodge refused to follow the established meeting system and instead arranged the herein-referenced private and limited meetings by invitation only to select individuals. I find nothing in the Bylaws establishing that meetings called by following such Sections, including the Section 3 words, “organize a new group.”

25. The four-year term of Earl F. Dodge for the period 1999-2003 was expiring. In view of his record, including the deteriorating situation of the PNC under his auspices, his obstructing members from notice, and his refusal to convene the requisite meetings including “of the entire membership of the National Committee,” he was not re-elected.

26. Earl F. Dodge has not been the PNC Chairman for now more than two (2) years.

27. Having been appointed a federal government Crime Prevention Officer (PNC Exhibit A below), and the first law I was taught in government so many years ago was 18 USC § 1001, I react to falsification, fraud, and mail fraud by calling it to the attention of appropriate authorities for disposition pursuant to, e.g., 18 USC § 1001, § 1341, and § 1961, which may include criminal prosecution of perpetrators and their accessories.

28. All information in the accompanying ANSWER AND OPPOSITION TO PETITION FOR LEAVE TO MAKE DISTRIBUTION TO INCOME BENEFICIARY AND TO DIRECT THE REFUND OF PRIOR INCORRECT DISTRIBUTION, is true and correct.

1 Exhibit (App’t letter)

Respectfully,

By: \_\_\_\_\_  
Leroy J. Pletten, Secretary  
Prohibition National Committee  
8401 18 Mile Road #29  
Sterling Heights, Michigan 48313-3042  
(586) 739-8343

Subscribed and sworn before me,  
this 25th day of October, 2005, a  
Notary Public in and for  
Macomb County, Michigan

IN THE COURT OF COMMON PLEAS  
OF DELAWARE COUNTY, PENNSYLVANIA  
ORPHANS' COURT DIVISION

No. 114-1937

RESIDUARY TRUST UNDER WILL OF  
GEORGE F. PENNOCK FOR THE  
BENEFIT OF THE PROHIBITION PARTY

---

AFFIDAVIT IN OPPOSITION TO  
PETITION FOR LEAVE TO MAKE DISTRIBUTION  
TO INCOME BENEFICIARY AND TO DIRECT THE  
REFUND OF PRIOR INCORRECT DISTRIBUTION

---

I hereby certify that on 25 October 2005, I transmitted the transmittal letter and

ANSWER AND OPPOSITION TO PETITION FOR LEAVE TO MAKE  
DISTRIBUTION TO INCOME BENEFICIARY AND TO DIRECT THE  
REFUND OF PRIOR INCORRECT DISTRIBUTION, AFFIRMATIVE  
DEFENSES, and REQUEST FOR JURY TRIAL

and

AFFIDAVIT IN OPPOSITION TO PETITION FOR LEAVE TO MAKE  
DISTRIBUTION TO INCOME BENEFICIARY AND TO DIRECT THE  
REFUND OF PRIOR INCORRECT DISTRIBUTION, with EXHIBIT

by at least first class mail, postage prepaid, to

Clerk of Court  
Orphans Court Division  
Court of Common Pleas of Delaware County  
201 W Front St  
Media PA 19063-2708

Howard L. Lydick, Esquire  
413 Ridgheaven Place  
Richardson, TX 75080-2538

Sue D. Lomas  
Wolf, Block, Schorr, and Solis-Cohn LLP  
1650 Arch Street, 22nd Floor  
Philadelphia, PA 19103-2097

Prohibition National Committee  
c/o Earl F. Dodge, Chairman Emeritus  
P. O. Box 2535  
Denver, CO 80201-2635

By: \_\_\_\_\_  
Leroy J. Pletten, Secretary,  
Prohibition National Committee