

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

PNC Bank, N.A., as Trustee for the Estate of	:	
George Pennock	:	
Plaintiff,	:	No. 114-1937
v.	:	
	:	
Prohibition National Committee, et al.,	:	
	:	
Defendants.	:	
	:	

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AFFIDAVIT

STATE OF COLORADO    )  
                                   )SS  
 COUNTY OF JEFFERSON)

Earl Higgeson, being first duly sworn, deposes and says:

1. I am currently a member of the Prohibition National Committee (PNC) from the state of Colorado. I have a record of support of the Prohibition cause for over three decades.

2. I used to feel that I could trust then chairman Earl F. Dodge unquestioningly. I began giving regular donations to the organization in 1975, with the enthusiastic assent of my wife.

3. I began doing handyman jobs around the PNC office. Mr. Dodge rewarded me by helping me run for various state offices: for Lt. Governor (with him) in 1978 (2198 votes / 0.27%); for Senator in 1980 (7265 votes / 0.62%); for Lt. Governor with him again in 1982 (3496 votes / 0.37%); for Senator again in 1984 (1376 votes / 0.11%); for Lt. Governor with him a third time in 1986 (8183 votes / 0.78%); for Lt. Governor (with David Livingston) in 1990 (7907 votes / 0.78%); and as a write-in candidate for Congressional District 6 in 1992.

4. I have attended several Prohibition Quadrennial Conventions over the years, pursuant to

the Convention Rules and past practice, and served as a delegate from Colorado.

5. Mr. Dodge persuaded me to become the PNC Treasurer; and I was elected as Treasurer from 1983 until 1993. I accepted election as Treasurer expecting to do the job a normal Treasurer would do, but Mr. Dodge would not let me do so.

6. I developed grave questions regarding PNC's financial affairs, and was troubled that Mr. Dodge did not provide to me as Treasurer a satisfactory accounting of PNC expenditures.

7. Mr. Dodge never allowed me to sign the check card at the bank, to sign checks, to handle any money, or to see the list of donors. This seemed strange, and when I finally mentioned this situation to my lawyer, he told me to get out of there, immediately. I thereupon resigned.

8. I raised these issues to other PNC members. Due to my questioning his behavior, Mr. Dodge came to deem me unwelcome, including not allowing me at organization meetings despite past practice with respect to notifying and allowing attendance by all Prohibition supporters.

9. With respect to Mr. Dodge's June 2003 meetings, I recognize that pursuant to the PNC By-Laws and parliamentary procedure, that when meetings are held without proper notice and quorum that they are not valid.

10. Despite my record of having attended several Prohibition Quadrennial Conventions and serving as a delegate, 2003 was different. As a person in disfavor with Mr. Dodge, I was not notified and was not given opportunity to be a delegate in 2003 to Mr. Dodge's private in-home and church meetings claimed to be the 2003 Prohibition National Convention.

11. I attended the biennial PNC meeting in June 2005 convened by the majority "Webb group," a meeting held pursuant to the PNC Bylaws. I have no knowledge whether the "Dodge group" held a biennial meeting in 2005 as required by the Bylaws.

12. I recognize the majority so-called “Webb group” as the genuine Prohibition National Committee, and not the minority “Dodge group.”

13. I am concerned that Mr. Dodge plans repetition of his June 2003 type claim of holding a Prohibition National Convention in June 2007, apparently with his minority group. I believe that his causing such a repeat divisive situation reflects badly on the organization.

Respectfully,

*Earl Higginson*

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Earl Higginson  
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Subscribed and sworn before me, this *22nd* day of *January, 2007*  
2007, a Notary Public in and for Jefferson County, Colorado

*Thomas C. Sullivan*

**My Commission Expires 4-17-2007**

**THOMAS C. SULLIVAN**

**NOTARY PUBLIC  
STATE OF COLORADO**