

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

JURY TRIAL DEMANDED

Interrogatories of the "Prohibition National Committee" (hereinafter "PNC"
a.k.a. the "Webb group") Directed to Earl F. Dodge of the "Dodge group"

Pursuant to the provisions of the Pennsylvania Rules of Civil Procedure, as amended, you are required to forward a copy to the undersigned and retain the original of your Answers and objections, if any, in writing and under oath, to the following Interrogatories, within thirty (30) days of service thereof.

The Answers shall be inserted in the spaces provided following each Interrogatory. If there is insufficient space to answer an Interrogatory, the remainder of the Answer shall follow on a supplemental sheet, identified by Interrogatory Number.

DEFINITIONS AND INSTRUCTIONS

A. **"Document"** - writings or recordings of any kind, whether handwritten, typed, or printed, and including, but not limited to, letters, memoranda, bulletins, newsletters, orders, photographs, microfilms, resolutions, books, computer printouts, computer cards, papers, pamphlets, notebooks, diaries, notes, recording tapes, recording discs, recording wires, manuals, regulations, rules, and forms.

B. **"Identify"** - when used with reference to a person, shall mean and include the full name, present or last known business address, and if an individual, present or last known home address. When used with reference to a document or writing, the word "identify" shall mean to include the date it was written; identify each person to whom it was addressed and identify each person to whom a copy was identified as being directed, identify each person who received a copy of the document or writing with a description of the document or writing as for instance, "letter," "memorandum"; include the present location and identify its custodian. If any document or writing is no longer in your possession or subject to your control, state what disposition was made of it, the reason for such disposition, the date thereof, and identify its current or last known location and custodian.

C. **“Concern”, “concerned”, or “concerning”** - means referring or relating to, pertaining to, commenting on, or connected with, in any manner whatsoever.

D. **“You,” “your”** - means the person in whose name or on whose behalf or for whose benefit this action is brought, their colleagues, employees, officers, representatives, agents, and attorneys, or any person working for such persons.

E. **“Webb group” and “Dodge group”** - have the meaning evident from the “Answer and Opposition” to the Petition herein.

F. **“Disinterested”** - impartial, unbiased, unprejudiced (a legal term used concerning the duty of organization directors and officers).

Legal terms used in these Interrogatories not specifically or fully described above shall have the meaning provided in the statute, regulation, or other legal authority from which the term is derived, if any, or in the most recent edition of *Black’s Law Dictionary*. Any other word or term used in these Interrogatories which is not specifically defined below shall have its ordinary and customary meaning and usage.

Objections to all or any portion of an Interrogatory shall be set forth with specificity sufficient to allow the party propounding these Interrogatories to understand the exact scope of and reason for the objection. Where an objection relates to only a portion of the information requested in an Interrogatory, all other information not within the scope of said objection shall be provided.

These Interrogatories are deemed to be continuing in nature, in accordance with the provisions of the Pennsylvania Rules of Civil Procedure, as amended. If, between the time of forwarding your original Answers to these Interrogatories and the time of trial of this matter, you or anyone acting on your behalf learn the identity and location of additional persons having knowledge of discoverable facts and the identity of persons expected to be called as a witness or expert witness at trial not disclosed in your Answers, or if you or an expert witness obtain information upon the basis of which you or he/she know that an Answer was incorrect when made or knows that an Answer, though correct when made, is no longer true, then you shall promptly supplement your original Answers under oath to include such information thereafter acquired and promptly furnish such a supplemental Answer to the undersigned.

LEROY J. PLETTEN

By: _____

Leroy J. Pletten
Secretary, Prohibition National Committee
8401 18 Mile Road #29
Sterling Heights MI 48313-3042
(586) 739-8343
On behalf of the Prohibition National Committee

1. PERSONAL INFORMATION

State:

- (a) Your full name;
- (b) Each other name, if any, which you have used or by which you have been known;
- (c) Your date of birth;
- (d) Your military service and positions held, if any; and
- (e) The schools you have attended and the degrees or certificates awarded and the years awarded, if any.

ANSWER:

2. WITNESSES

(a) Identify each person who

(1) Was a witness to the pertinent events through sight or hearing and/or

(2) Has knowledge of the facts concerning the happening of the pertinent events or conditions or circumstances of the events described in the Petition giving rise to this litigation.

(b) With respect to each such person identified, state the person's exact location and activity at the time of the pertinent events.

ANSWER:

3. STATEMENTS

If you know of anyone who has given any statement (as defined by the Pennsylvania Rules of Civil Procedure) concerning this action or its subject matter (other than those already included as Exhibits attached with the Petition giving rise to this litigation), state:

- (a) The identity of such person;
- (b) When, where, by whom, and to whom each statement was made, and whether it was reduced to writing or otherwise recorded; and
- (c) The identity of any person who has custody of any such statement that was reduced to writing or otherwise recorded.

ANSWER:

4. DEMONSTRATIVE EVIDENCE

If you know of the existence of any photographs, motion pictures, video recordings, audio recordings, maps, diagrams, or diaries relevant to the events at issues, state:

- (a) The nature or type of such item;
- (b) The date on which such item was made;
- (c) The identity of the person who prepared or made each item; and
- (d) The subject that each item represents or portrays.

ANSWER:

5. TRIAL PREPARATION MATERIAL

If you or someone not an expert pursuant to Pa.R.C.P. No. 4003.5, conducted any investigation of the events at issue, identify:

- (a) Each person, and the employer of each person, who conducted any investigation(s); and
- (b) All notes, reports, or other documents prepared during or as a result of the investigation(s) and the persons who have custody thereof.

ANSWER:

6. TRIAL WITNESSES

Identify each person you intend to call as a non-expert witness at the trial of this case, and for each person identified, state your relationship with the witness and the substance of the facts to which the witnesses is expected to testify.

ANSWER:

7. Identify each person you intend to call as an expert witness at trial, and if none, so state.

ANSWER:

8. BOOKS, MAGAZINES, NEWSPAPERS, ETC.

If you intend to use any book, magazine, or other such writing at trial, state:

- (a) The name of the writing;
- (b) The author of the writing;
- (c) The publisher of the writing;
- (d) The date of publication of the writing; and
- (e) The identify of the custodian of the writing.

ANSWER:

9. Please identify all attorneys, consultants, sureties, indemnitors, insurers or agents who have in any way, or in any manner, had any contact with you concerning any claim or defense of any part to this litigation presented by the Petition herein, or with your attorneys or representatives, if any, relative to any aspect of this case, and as to each such person, please state the following:

(a) Name;

(b) Present or last known address;

(c) Occupation;

(d) Present or last known employer;

(e) Address of such employer;

(f) Telephone number of such person(s); and

(g) The mental impressions, conclusions, opinions, memoranda, notes or summaries, except those of your attorneys (if any) and except those mental impressions, conclusions, or opinions respecting the value or merit of the claim or defense, or respecting strategy or tactics.

ANSWER:

10. ADMISSIONS

If you intend to use any admission(s) of a party at trial, identify such admission(s):

ANSWER:

11. SUBJECT MATTER

If you filed on behalf of the PNC, or other Prohibition-related entity with which you are affiliated, any documents with any federal, state, or local government agency since the June 1999 nominating convention in Pennsylvania, please

(a) state the name and address of the government agency;

(b) provide a copy of such filing(s).

ANSWER:

12. Identify all persons chosen at the 1999 PNC nominating convention and meetings as PNC members for the 1999-2003 term.

ANSWER:

13. State whether you know if any of the other signatories (Paul Scott, Jerry Kain, Karen Thiessen, Howard Lydick, Margaret Shickley, Faith Nelson) of the November 2004 statements (included in Petition Exhibit B) claiming that the September 2003 meetings “organized a new group” attended said meetings, and if so, state the name(s) of such attendees.

ANSWER:

14. State whether Earl F. Dodge attended the September 2003 Tennessee meetings which you allege “organized a new group.”

- (a) If not, state your reason(s) for not attending;
- (b) State what you hoped to accomplish by not attending;
- (c) State whether you believe that your non-attendance would nullify those meetings;
- (d) If you so believe, state the basis for such belief, citing Bylaws clause(s) if any upon which you rely for such belief.

ANSWER:

15. State whether any documents existed before and at the time of signing the November 2004 statements showing that the September 2003 Tennessee meetings “organized a new group.”

- (a) If any, identify each, and provide a copy.

ANSWER:

16. State who drafted the November 2004 statements asserting that the September 2003 Tennessee meetings “organized a new group”;

(a) When;

(b) Where;

(c) At whose initiative or request;

(d) What investigation had first been done to verify “organized a new group” claim.

ANSWER:

17. State whether the signatures were obtained at a meeting attended by the signers;

(a) If not at a meeting, state how they were obtained, e.g., by mail, by conference call, by separate calls to each signatory, or by whatever means, and identify the method used with each.

ANSWER:

18. State what information, if any, was provided to each signer to induce or secure their signature;

(a) State who provided such information, if any;

(b) When;

(c) Where;

(d) State whether the information was verbal or written; if written, please attach a copy.

ANSWER:

19. State whether any documents existed at the time of signing the November 2004 statements establishing that each signer held the position(s) alleged to be held in the PNC;

(a) If so, please provide a copy of each such document.

(b) State how each such document(s) came to exist.

ANSWER:

20. State whether prior to November 2004, you had announced that Leroy Pletten was the Secretary of the PNC;

- (a) If so, state for what length term of office;
- (b) If so, state the planned beginning and ending dates and/or years of said term;
- (c) If so, state whether such announcement(s) was/were in writing;
- (d) If so, please provide a copy (if other than those already in Petitioner's Exhibit B).

ANSWER:

21. State whether the consent of Leroy Pletten was obtained prior to sending to the Bank the November 2004 statements and other materials at Petitioner Bank's Exhibit B.

- (a). If not obtained, state the reason(s) for not obtaining such consent.

ANSWER:

22. State whether any document(s) existed at the time of signing the November 2004 statements establishing or verifying that Leroy Pletten was not the Secretary of the PNC;

- (a) If so, please provide a copy of each such document;
- (b) State how each such document(s) came to exist.

ANSWER:

23. State what process or method you used to set up the June 2003 meetings in Colorado.

(a) State what notice was given;

(b) State whether some members received written notice and others, verbal notice;

(c) If so, state names of each recipient identified by notice method used with each;

(d) Please provide a copy of such written notice, if any.

ANSWER:

24. State whether the “Minutes” of the June 2003 meetings in Colorado (included in Petitioner Bank’s Exhibit B) cite the presence of a quorum?

(a) If not, state the reason(s) for not doing so.

ANSWER:

25. Concerning the June 2003 meetings you conducted in Colorado, state whether a quorum-determination process was used;

(a) If so, state what that process was;

(b) State the names of the persons who were counted for quorum-determination purposes for the meetings listed in the "Minutes."

ANSWER:

26. State whether any non-disinterested persons or relatives, e.g., daughters of yours, were counted for quorum-determination purposes.

(a) If so, state their name(s) and the reason(s) for counting them.

ANSWER:

27. State whether you deemed any among the PNC membership in the June 1999 - May 2003 time frame to be “troublemakers”;

(a) State the names of such PNC members;

(b) State the reason(s) for your identifying them as “troublemakers”;

(c) State whether charge(s) were officially filed against such PNC members pursuant to the PNC Bylaws procedure.

(d) State whether you declared or deemed any such PNC members as no longer members without following the PNC Bylaws removal procedure;

(e) State the name of each PNC member whom you ‘removed’ in the June 1999 - May 2003 time frame by such declaration.

ANSWER:

28. State the name(s) of the remaining PNC members, if any, whom in June 2003 you believed to still be “troublemakers”;

(a) State your reason(s) for the said belief;

(b) State whether charge(s) were officially filed against such PNC members pursuant to the PNC Bylaws procedure.

ANSWER:

29. State how you decided whom to invite to the June 2003 meetings in Colorado;

(a) Please state the name of each person invited;

(b) State the names of any PNC member(s) denied eligibility to participate.

ANSWER:

30. State whether, during your tenure as PNC Chairman, you have spent any of the Pennock Trust Funds on personal activities of yours;

(a) If so, state amounts, dates, and purposes(s) of such expenditures;

(b) State who authorized such personal expenditures, and when;

(c) State if authorization is in writing;

(d) If authorization is in writing, so state and provide a copy.

ANSWER:

31. During your tenure as PNC Chairman, state whether you have spent any PNC funds not from the Pennock Trust Fund on personal activities of yours;

(a) If so, state amounts, dates, and purposes(s) of such expenditures;

(b) State who authorized such personal expenditures, and when;

(C) If in writing, so state, and provide a copy of such authorization(s).

ANSWER:

32. During your tenure as PNC Chairman, state whether any PNC members expressed concerns about your spending or accounting behavior;

(a) If so, please state names, dates, when, where, and how such concerns were expressed;

(b) If in writing, so state, and provide a copy.

ANSWER:

33. State whether your making claims alleging “former members” and the September 2003 meetings having “organized a new group” are a device

(a) Designed to circumvent and not have to deal with PNC members’ concerns about your behavior;

(c) Designed to exclude such persons from PNC membership.

ANSWER:

34. State whether any of the signatories of the statements included in Petitioner Bank's Exhibit B have a record of disinterestedness;

(a) State whether any of the signatories of the statements included in Petitioner Bank's Exhibit B have a record of having raised questions about your activities such as your financial management or administration;

(b) State whether you deem those signatories unconditional or unquestioning supporters;

(c) If not, state your reason(s) for not so considering them.

ANSWER:

35. State whether there were changes in membership on the PNC after the 1999 "nominating convention" and before the events at issue herein held in your home and church in June 2003;

(a) State when and by what means such changes occurred;

(b) Identify names of persons concerning whom change(s) occurred;

ANSWER:

36. State whether charge(s) have at any time during your tenure as Chairman, been filed against any PNC member(s) pursuant to the PNC Bylaws procedure;

- (a) If so, state which PNC member(s);
- (b) If so, state the charge(s);
- (c) State the disposition of each such charge;
- (d) Please provide a copy.

ANSWER:

37. State whether during your tenure as Chairman, you have discussed the PNC Bylaws ten (10) signature clause (“Section 3 Call of Committee”) for calling a PNC meeting with any PNC member(s);

- (a) If so, state the name(s) of such PNC member(s);
- (b) State when and where such discussion(s) occurred;
- (c) State the context in which such discussion(s) occurred;

ANSWER:

38. State the reason(s) that such ten (10) signature clause was placed into the Bylaws.

ANSWER:

39. Identify the “Clifton Powell” who is listed in the “Minutes” included by the Petitioner Bank among its “Exhibit B” material.

(a) State whether he was a PNC member before the June 2003 meetings at issue herein;

(b) If not, state whether you nonetheless informed him of those meetings so as to enable him to attend’

(c) State how you notified him (verbally or in writing, if in writing, provide a copy);

(c) State your reason(s) for notifying him to attend;

(d) State whether you contacted him in an effort to get him to sign one of the November 2004 statements alleging that the September 2003 Tennessee meetings “organized a new group”;

(e) If you made such contact, state his response, and if in writing, provide a copy;

(f) If you did not make such contact, state your reason(s) for not making such contact;

(g) State what is his current role in the PNC.

ANSWER:

40. Identify the “Jerry Kain” who is listed in the “Minutes” included by the Petitioner Bank among its “Exhibit B” material;

(a) State whether he attended your June 2003 Colorado meetings at issue herein.

ANSWER:

41. State whether Howard Lydick is a PNC member;

(a) State the reason(s) the “Minutes” in Petition Exhibit B do not list him as a member from an state in the listing-by-state section;

(b) State how it is possible to be a PNC officer (alleged Vice-Chairman) but not be a PNC member, identifying Bylaws section(s) so authorizing.

ANSWER:

- 42.** State whether Howard L. Lydick is the attorney for the PNC;
- (a) If so, state what process appointed him as such;
 - (b) State the names of the PNC members who approved that appointment;
 - (c) Identify any members of the PNC who did not approve that appointment;
 - (d) Name the state(s) where Lydick has a current license to practice law.

ANSWER:

- 43.** State whether Karen J. Thiessen is a PNC member;
- (a) State the reason(s) the “Minutes” in Petition Exhibit B do not list her as a member from an state in the listing-by-state section;
 - (b) State how it is possible to be a PNC officer (alleged Treasurer) but not be a PNC member, identifying Bylaws section(s) so authorizing.

ANSWER:

44. State whether Karen J. Thiessen used to be listed as a PNC member from Colorado;

(a) If replaced by the aforesaid Clifton Power, state the reason(s) for her replacement.

ANSWER:

45. State whether you have told Don Webb that a person cannot be a PNC officer unless first a PNC member;

(a) If so, state when and the context in which you told him that.

ANSWER:

46. State the method(s) by which a meeting of the PNC can or must be convened, and for each method, identify the PNC Bylaws clause(s) so providing.

ANSWER:

47. State whether any method cited by the PNC Bylaws provides for convening a meeting of the PNC by the obtaining of ten signatures;

- (a) State whether following that procedure does “organize a new group”;
- (b) If it does, identify how it does that;
- (c) If it does not, so state.

ANSWER:

48. State whether the PNC Bylaws’ “biennial meeting” clause can properly be circumvented by a Chairman by the device of his/her refusing to convene such meeting;

- (a) If you have written evidence that circumventing this Bylaw is permissible, please provide a copy. (If none, please so state.)

ANSWER:

49. State what is your current practice on accepting or refusing mail from Don Webb;

- (a) State when that practice began;
- (b) State whether you placed notice of that practice in writing, and if so, provide a copy;
- (c) If your practice includes marking “refused” on envelopes from him, so state.

ANSWER:

50. State whether you told Don Webb that he could not attend the June 2003 meetings you convened in Colorado;

(a) If so, state your reason(s) for so notifying him;

(b) State whether such notice was in writing;

(c) If so, provide a copy.

ANSWER:

51. State whether you notified the “entire membership” of the PNC in advance of the June 2003 meetings you convened in Colorado;

(a) State whether this notice was in writing; and if so, provide a copy.

(b) If not in writing, please state your reason(s) for not providing written notice.

(c) If any PNC members were not notified, state who was not notified.

ANSWER:

52. With respect to your setting up the Colorado June 2003 meetings at issue herein, state specifically whether you provided written notice the “entire membership” of the PNC, e.g., to James Partain, Don Webb, W. Earl Erion, Thomas Cisar, Paul Scott, Karen J. Thiessen, Eunice Hansen, Vearl Bacon, Richard K. Whitney, Roger Williams, Rachell Mitchell, Ann Moe Finsveen, Faith D. Nelson, Betty Isaacs, William Bryk, Russell Hallock, Gerald Cain, Robert Blair, Lee Kennicutt, George Ormsby, Margaret Shickley, Howard Lydick, Lee McKenzie, Gary R. Van Horn, and Frank Clark;

- (a) If not, state your reason(s) for not providing each such a notice;
- (b) If you provided verbal notice, so state, and to whom;
- (c) State whether you have written evidence of having notified them;
- (d) If so, provide a copy.

ANSWER:

53. State whether the “entire membership” of the PNC attended the June 2003 meetings you convened in Colorado;

- (a) If not, state how many and who were counted as attending;
- (b) State who made the count;
- (c) State whether a record was made of the count, and if so, provide a copy of such record;
- (e) State who did not attend.

ANSWER:

54. State whether you have convened a meeting whether deemed “biennial” or of the “entire membership” of the PNC in 2005?

- (a) If so, please state, when, where, and by what notice method(s).
- (b) If not, please state your reason(s) if any for not convening such meeting.

ANSWER:

55. State what are the functions of the PNC Treasurer according to the PNC Bylaws.

ANSWER:

56. State the name of the person you claim to be the current PNC Treasurer if other than Karen J. Thiessen (as alleged in her November 2004 statement in Petition Exhibit B).

ANSWER:

57. State what actual specific Treasurer functions that person (Karen J. Thiessen or otherwise), performs;

- (a) State how often;
- (b) State when such functions have been performed by that person;
- (c) State what signatory authority that person has;
- (d) State how many checks that person has signed, with check numbers, and provide a copy;
- (e) State whether that person's name is on the Bank signature authorizing document;
- (f) If so, state when that Bank document was initiated;
- (g) State the name and address of the current Bank, and the current Account Number;
- (h) State what, if any, financial reports that person has issued; when; please provide a copy of each;
- (i) State whether that person is the recipient of the Bank's monthly statements;
- (j) If not, state the reason(s);
- (k) If no actual Treasurer functions have been performed by that person, so state.

ANSWER:

58. State the income, if any, of the “Dodge group” PNC since the financial report you provided at the June 2003 Colorado meetings.

- (a) State the sources;
- (b) State how often income is received;
- (c) State from whom, with names and addresses.

ANSWER:

59. State the expenses, if any, accrued and paid by the “Dodge group” PNC since June 2003.

(a) State the check numbers, and provide a copy of each;

(b) State the purpose(s) of each expenditure;

(c) State the name of the person(s) who authorized each disbursement;

(d) State whether such authorization was in writing. If so, provide a copy.

ANSWER:

60. State what are the functions of the PNC Secretary according to the PNC Bylaws.

ANSWER:

61. State the name of the person you claim to be the PNC Secretary, if other than Paul Scott (as alleged in his statement in Petition Exhibit B).

- (a) State when and where and under what circumstances that person was allegedly chosen Secretary;
- (b) State the number of votes allegedly received by that person;
- (c) State the names of PNC members who allegedly voted to make that person Secretary;
- (d) State whether all PNC members had been notified to participate in such voting;
- (e) State whether the vote result making that person Secretary is in writing; and if so, provide a copy.
- (f) State the nature of the meeting, if any, at which this vote was conducted;
- (g) If no meeting was held at which this vote was conducted, so state;
- (h) State the name of opposing candidate(s), if any;

ANSWER:

62. State what actual specific Secretary functions that person, Paul Scott or otherwise, performs;

(a) State how often such functions are performed by him/her;

(b) State when that function has been performed by him/her;

(c) State whether these performed functions, if any, have been in writing;

(d) If so, provide a copy;

(e) If no actual Secretary functions have been performed by that person, so state.

ANSWER:

63. State who issues the *National Statesman*;

(a) State how often it is issued.

ANSWER:

64. State the *National Statesman* subscribers' names and addresses.

ANSWER:

65. State whether *The National Statesman* has contained articles since June 2003 warning against or alleging misconduct by Don Webb, James Hedges, or others in the “Webb group,” if any, alleged to be past PNC members;

(a) If so, please so state, and provide a copy of each such article.

ANSWER:

66. State whether the *National Statesman* informed the subscribers of the November 2004 election results for your candidacy for President;

(a) If so, please so state, and provide a copy of such article(s).

(b) If not, state the reason(s) for not so informing the subscribers and readers.

ANSWER:

67. State whether, with respect to the media materials including articles and broadcasts cited in Petition Exhibit B, as allegedly supporting your legitimacy as PNC Chairman and Presidential candidate, you fully informed each of the media persons cited, of the full scope of the issues involved, including the notice, disinterestedness, and quorum issues;

(a) If you did not so inform each in the media, please state your reason(s) for not so informing them.

ANSWER:

68. State whether the Prohibition Trust Fund has ceased funding for your “Dodge group” PNC, on the basis of your alleged failure to account for how their previous years' funds provided were spent;

- (a) Or been ceased for any other reason;
- (b) If so, please state whether you were informed verbally or in writing;
- (c) If in writing, please so state, and provide a copy.

ANSWER:

69. State the position(s) in the PNC that used to be held by Earl Higgerson.

- (a) State his term(s) of office;
- (b) State what year his last term of office began, and what year ended;
- (c) For how many terms was Mr. Higgerson elected;
- (d) If Mr. Higgerson’s position was PNC Treasurer, state the reason(s) for having made him Treasurer.

ANSWER:

70. State whether Higgerson resigned ahead of his last term’s normal four year expiration.

ANSWER:

71. State the reason(s) provided by Mr. Higgeson for his resignation as PNC Treasurer;

(a) If in writing, so state, and provide a copy.

ANSWER:

72. State any areas of disagreement, if any, you have with Higgeson's resignation reasons, and for any such disagreement(s), provide any and all documents in support of your disagreement.

ANSWER:

73. State your familiarity with Sarah Ulmer's bequest;

(a) State the initial amount;

(b) State what disposition was made of the Sarah Ulmer bequest;

(c) State whether any amount remains;

(d) If so, state how much;

(e) Please provide a copy of the bequest document(s).

ANSWER:

74. State the nature of your relationship with the Woman's Christian Temperance Union.

(a) If the relationship changed over the years, please explain.

ANSWER:

75. State whether you are now, or ever were, a member of, or affiliated with, the American Political Items Collectors (APIC);

- (a) If so, state the dates (beginning and ending years) of your membership;
- (b) If so, state its address and telephone number;
- (c) State the purpose(s) of such membership or affiliation;
- (d) State whether such purpose(s) was/were accomplished;
- (e) If not still a member, state the nature of your leaving (i.e., resignation, expiration of membership, expulsion, or whatever);
- (f) If expulsion or resignation under disciplinary circumstances, state the charge(s);
- (g) If charges were in writing, please provide a copy.

ANSWER:

76. State whether the National Prohibition Foundation (hereinafter “NPF”) maintained an office building rented by the PNC during your tenure as Chairman;

- (a) If so, state when, including beginning and ending years;
- (b) State the address;
- (c) State whether the NPF still retains ownership of the building;
- (d) If not, state when sale occurred, and the circumstances of the sale;
- (e) State what disposition was made of the proceeds from the sale;
- (f) State the names of the NPF members at the time of sale;
- (g) State the names of the NPF members, if any, who approved the sale, and whether that approval is in writing, if so, please provide a copy;
- (h) State the names of the current NPF members;
- (i) State the reason(s) the NPF owned the building instead of the PNC;
- (j) State your role in each aspect, the purchase, the rental, and the sale decisions.

ANSWER:

77. State the nature of your relationship with Sarah F. Ward, National President, Women's Christian Temperance Union;

(a) State whether you have refused any State Prohibition Party organizing efforts by her;

(b) If so, state when, and under what circumstances.

ANSWER:

78. Please state whether you have solicited deposits from PNC and/or *National Statesman* mailing list members;

- (a) If so, state whether you offered to pay a good rate of interest on said deposits;
- (b) If so, state when and the names of those solicited;
- (c) State whether any “deposits” were received and from whom;
- (d) State whether those deposits have been paid back with or without interest;
- (e) If not, state the circumstances of non-payment;
- (f) If paid back, state the source(s) of the funds for such repayment(s).

ANSWER:

79. State whether solicitation of deposits from PNC and/or *National Statesman* mailing list members was a formal policy of the PNC;

- (a) If so, please state if the policy was recorded in writing, and if so, provide a copy;
- (b) If not a formal PNC policy, state whose policy it was;
- (c) If not a formal PNC policy, state the legal framework under which the “deposits” were solicited and held;
- (d) State who within the PNC was/were responsible for overseeing the deposits program.

ANSWER:

80. State whether you, when the office building used by the PNC was sold, made verbal or written assurance that nobody lost anything on it;

(a) If so, please state when, and to whom such assurance was made;

(b) If in writing, please so state, and provide a copy.

ANSWER:

81. State whether you have used PNC funds for health or life insurance for yourself;

(a) If so, please state what year this began;

(b) Please state the amount(s) paid itemized by year since the beginning;

(c) State who authorized such payments;

(d) State whether such authorization is in writing, if so, please provide a copy.

ANSWER:

82. Please state what is meant by the term “field work.”

(a) State how much has been spent in each of the years 1999 through 2005 (November 2005) on “field work”;

(b) Please itemize such expenditures, by payee, amount, date, and purpose(s);

(c) State how such payments were made (e.g., by check or cash);

(d) If by check, provide a copy of such checks.

ANSWER:

83. State whether you have a practice of providing a copy of the names and addresses of all PNC members to each member of the PNC;

- (a) If so, please state when you began doing this.
- (b) If not, state your reason(s) for not providing each PNC member a copy;
- (c) State whether there is a PNC policy banning providing each PNC member a copy of the names and addresses of all PNC members;
- (d) If so, state when and by whom it was adopted;
- (e) If in writing, please so state and provide a copy of such policy.

ANSWER:

84. State whether the “Minutes” (in Petition Exhibit B) of the June 2003 meetings in Colorado are

- (a) Accurate;
- (b) If not, cite any errors;
- (b) Complete;
- (d) If not, cite any omissions;
- (e) Official.

ANSWER:

85. State who prepared the “Minutes” (in Petition Exhibit B) of the June 2003 Colorado meetings;

- (a) When;
- (b) Whether made from notes;
- (c) If so, state whose notes.

ANSWER:

86. State whether the tape recordings by Margaret Shickley were used to aid in preparing those “minutes” for the said June 2003 meetings;

- (a) If not, state the reason(s) for not using the tapes for minutes-preparation purposes;
- (b) Please provide a true copy of said tape-recording(s).

ANSWER:

87. State whether those “minutes” were presented to Leroy Pletten for signature;

- (a) If yes, state when;
- (b) If not, state the reason(s) for this not being done.

ANSWER:

88. State whether Trust Officer Robert Altimore, Jr., is correct in saying that “the Dodge group is the organization to which fifty percent of trust income was being paid”;

(a) If you say ‘yes,’ please state your reason(s) for saying ‘yes.’

(b) State whether any checks from the Pennock Trust have been paid to the order of “the Dodge group”, and please provide a copy of each such check;

(c) State whether you have made Mr. Altimore aware of the long-time concerns by the so-called “trouble-makers” about your spending PNC funds including Pennock funds on your personal activities;

(d) If you have, state whether such notice was verbal or written;

(e) If written, please provide a copy;

(e) If you have so informed him, state what response(s) he made to you;

(f) If written, so state, and please provide a copy.

ANSWER:

89. State whether any of the signatories of the statements included in Petition Exhibit B questioned whether they could truthfully say that the September 2003 Tennessee meetings “organized a new group”?

(a) State whether any of the signatories raised the issue of or objection that they could not so allege and sign inasmuch as they had not attended;

(b) If so, state name(s) and the substance of the issue(s) or objection(s) raised;

(c) State whether any of the signatories expressed views other than a willingness to sign anything that pleased you, regardless of the truth or falsity thereof, and regardless of their lack of personal knowledge thereof;

(c) If so, state name(s) and the substance of such expressed views.

ANSWER:

90. State the names of the persons whom you recognize as genuine PNC members.

(a) State the names of the persons you recognize as genuine PNC officers.

(b) If any names are different than those listed in the materials in Petitioner’s Exhibit B, state the reason(s) for such variances.

ANSWER:

91. State whether you have documents confirming that all the persons chosen to be PNC members for a 2003-2007 term at your June 2003 agree that said meetings supposedly electing them were valid;

(a) If so, please so state, and provide a copy of each such document;

(b) If not, state the reason(s) for not having such documents.

ANSWER:

92. State whether a second signature is needed for PNC checks that you sign;

(a) If so, state whose signature.

ANSWER:

93. State the names of any and all other Prohibition-related groups of which you are a director or officer;

(a) State how long you have been a director or officer in each such group(s);

(b) State the names and addresses of the fellow directors of such organizations.

ANSWER:

94. State whether you are familiar with the legal concept of “disinterestedness” with respect to the duties of an organization director;

(a) If so, state when you first developed such familiarity;

(b) If so, state the circumstances of your developing such familiarity.

ANSWER:

95. State the address to which you have told the 1st Bank of Colorado with respect to Bank Account 216-151-1041 to send the periodic account statements;

(a) If that address is PO Box 2635, Denver CO 80201-2635, state the reason(s) for choosing that address;

(b) State for how many years that has been the designated mailing address for that account;

(c) State whether the mailing address for that account has ever been the address of the different PNC Treasurers during the years of your tenure as Chairman;

(d) If the mailing address for that account has never been the address of the PNC Treasurer, state the reason(s) for that being the case;

(e) If the mailing address for that account has ever been the address of the PNC Treasurer, state when the change-of-address was made, and the reason(s) for the change.

ANSWER:

96. State whether you have read

- (a) the precedents on quorum, notice, and disinterestedness cited in Petition Exhibit C;
- (b) books on parliamentary procedure;
- (c) If the latter answer is yes, state the names and authors of such books;

ANSWER:

97. State whether you are aware of any

- (a) court precedents upholding valid meetings without notice;
- (b) court precedents upholding valid meetings without a quorum;
- (c) court precedents upholding a lack of disinterestedness in a director;
- (d) parliamentary procedure books upholding valid meetings without notice;
- (e) parliamentary procedure books upholding valid meetings without a quorum;
- (f) parliamentary procedure books upholding valid meetings without a quorum;
- (g) If you state awareness of such, please identify them.

ANSWER:

98. State how many signatures were obtained to set up the September 2003 Tennessee PNC meeting;

(a) If you state a number, state when and how you learned that number;

(b) If you say you do not know the number of signatures that were obtained, state what efforts, if any, you made prior to the September 2003 meetings to find out;

(c) If you say you do not know, please state whether you refused any mailing(s) from Don Webb or others of the “Webb group” who might have informed you.

ANSWER:

99. State whether the Prohibition Trust Fund has ceased funding for your “Dodge group” Partisan Prohibition Historical Society, on the basis of your refusal to provide an accounting of how their previous years' money has been spent;

(a) Or any other basis;

(b) If so, please state whether you were informed verbally or in writing;

(c) If in writing, please so state, and provide a copy.

ANSWER:

100. State the PNC policy or practice during your tenure through June 2003 on when proxies are to be signed, and if in writing, please provide a copy.

ANSWER:

101. For a PNC member to provide someone his/her proxy, state what is the earliest that the proxy may be signed to be valid;

(a) State how far in advance of PNC events is the maximum that a proxy may validly be signed.

102. State whether proxies may validly be signed even to the last moment before a PNC meeting begins;

(a) If not, state the reason(s).

ANSWER:

103. State what were the credentials requirements for attendance and participation eligibility for the

(a) 1995 PNC nominating convention and PNC meeting;

(b) 1999 PNC nominating convention and PNC meeting;

(c) June 2003 nominating convention and meeting you convened.

ANSWER:

104. State whether the credentials requirements for participation in the PNC nominating convention had changed since June 1999 for the nominating convention you held in June 2003;

- (a) If so, state how they changed;
- (b) State who authorized the change;
- (c) When;
- (d) State whether such change is in writing;
- (e) If so, provide a copy.

ANSWER:

105. State whether a PNC member chosen in 1999 and not removed by the Bylaws procedure would automatically be eligible to attend the PNC meetings you held in Colorado in June 2003;

(a) If not, state the reason(s) such eligibility would cease;

(b) State the name(s) of any PNC member chosen in 1999 and not removed by the PNC Bylaws procedure who lost eligibility to attend the PNC meetings and nominating convention you held in June 2003;

(c) State whether such PNC member(s) were notified of such eligibility loss;

(d) State who made the decision(s) concerning such eligibility loss;

(e) State whether such decision(s) were in writing;

(f) If so, provide a copy.

ANSWER:

106. State whether Secretary Leroy Pletten's term ended before the normal four year 2003-2007 expiration.

ANSWER:

107. If in **106** above, “yes” is your answer (that Secretary Leroy Pletten’s term ended before the normal four year 2003-2007 expiration),

- (a) State the circumstances ending his term prematurely;
- (b) If charge(s) were filed under the PNC Bylaws removal process, state what they were;
- (c) If no charges were filed under the PNC Bylaws removal process, so state;
- (d) If charges were filed preliminary to attempting to end Pletten’s term prior to 2007, state whether notice of such charge(s) was provided to Pletten;
- (e) State who provided to Pletten such a notice;
- (f) If charge(s) were in writing, so state, and please provide a copy;
- (g) State whether a postal return receipt was obtained from Pletten;
- (h) If not, state the reason(s) for not having a postal return receipt;
- (i) If a postal return receipt was obtained, so state, and provide a copy;
- (j) State whether Pletten presented a defense;
- (k) If so, provide a copy;
- (l) State what the vote result was, and give names of ‘yes’ and ‘no’ voters.

ANSWER:

108. State the exact day and time that the terms of office of the PNC members chosen in the June 1999 nominating convention, were to expire with respect to your June 2003 meetings;

(a) State whether the terms of outgoing members would expire just before the first June 2003 meeting session would begin, or would continue for some moments;

(b) If the terms would continue for some moments, state the event(s), if any, that would signal the end of the prior term and the beginning of the new term;

(c) State whether such information is in writing;

(d) If so, provide a copy.

ANSWER:

109. State whether the process, if any, to end Pletten's term prematurely followed the procedures prescribed by the PNC Bylaws;

(a) If not, state the reason(s) for not following the PNC Bylaws procedure.

ANSWER:

110. List the names of the states that when your tenure as Chairman began, had a recognized state Prohibition organization.

ANSWER:

111. State the names of the states that any time in the June 1999 - June 2003 time frame had a recognized state Prohibition organization.

ANSWER:

112. State whether you recognized the efforts by Lois Helm, Mary Ann Freeman, Sarah Ward, and others to organize in Indiana;

(a) If not, state your reason(s); or if in writing to them, please so state, and provide a copy.

ANSWER:

113. State whether you recognized the efforts by Connie Gammon, Daniel Petty, and others to organize in Tennessee;

(a) If not, state your reason(s); or if in writing to them, please so state, and provide a copy.

ANSWER:

114. State whether you recognized the efforts by Evan Land, Edra Whidden, Jerome Colligan, and others, to organize in Florida;

(a) If not, state your reason(s); or if in writing to them, please so state, and provide a copy.

ANSWER:

115. State whether persons from any State in the 1999 - 2003 time frame (other than Indiana, Florida, and Tennessee) sought recognition of a new or attempted-new state Prohibition chapter or organization;

(a) Please list the names of such person(s);

(b) State whether you accepted and recognized each such new or attempted-new state organizations;

(c) State whether you declined to recognize any new state organization being attempted to be established within any State in the 1999 - 2003 time frame;

(d) If so, state the reason(s) for refusing such recognition.

ANSWER:

116. State the names and PNC position(s) of the person(s) who decided who received credentials for attending and participating in the PNC meetings and nominating conventions of

(a) 1995;

(b) 1999;

(c) June 2003 in Colorado.

ANSWER:

117. State the name under which is registered US Postal Service PO Box 2635, Denver, CO 80201-2635.

ANSWER:

118. State the names and PNC position(s) of the person(s) who provided credentials for Earl F. Dodge for the PNC meetings and nominating conventions of

(a) 1995;

(b) 1999;

(c) June 2003 in Colorado.

ANSWER:

119. State the names and PNC position(s) of the person(s) responsible for providing credentials for Don Webb for the PNC meetings and nominating conventions of

(a) 1995;

(b) 1999;

(c) June 2003 in Colorado.

ANSWER:

120. State the credentialing process that you required of Don Webb for your Colorado June 2003 meetings; or, if you put the requirement in writing, so state, and provide a copy.

ANSWER:

121. State whether Alabama State Prohibition Chairman Jim Partain informed you that, pursuant to your demand, Don Webb had asked him for a credential to the 2003 Prohibition National Convention you planned to hold in Colorado in June 2003;

(a) If yes, state what your response was to Mr. Partain;

(b) If in writing, so state and please provide a copy.

ANSWER:

122. State whether you contacted Mr. Partain prior to 3 June 2003 on the subject of Don Webb's credentials to attend your planned June 2003 PNC meetings and convention;

(a) If so, state the nature of such contact;

(b) If in writing, please provide a copy.

ANSWER:

123. State whether you required of any other PNC member the same credentialing process that you required in May-June 2003 of Don Webb;

(a) If so, state the name(s);

(b) If not, so state.

ANSWER:

124. State whether you required of Don Webb in May-June 2003 different credentialing than that you required of any other PNC members;

(a) If so, state your reason(s).

ANSWER:

125. If you deny requiring of Don Webb different credentialing than that you required of any other PNC members, so state, and state your reason(s) you believe that it was not different.

ANSWER:

126. State whether you have run for public office under any label other than Prohibition Party;

(a) If so, state the office(s), state(s), and year(s)

ANSWER:

127. State whether you were thereupon ousted from the PNC for doing so, for example, pursuant to a claim that you can not “serve two masters.”

ANSWER:

128. State whether you have told PNC members, if any, who have run for office under any label other than Prohibition Party, that they can not “serve two masters” so cannot be PNC members;

(a) If you deny so saying to any PNC member, please so state;

(b) If you have made such statements to PNC members, please state to whom, when, what office(s) was involved, and what PNC Bylaws clause(s) was violated by their so doing.

ANSWER:

129. State whether you have researched the pertinent state election laws on the issue of running for office under more than one party label;

(a) If so, identify which states' laws, and the date(s) of your doing such research.

ANSWER:

130. State whether you have been a member of the Denver-area Depression Glass club;

(a) If so, state the dates (beginning and ending years) of your membership;

(b) If so, state its address and telephone number;

(c) State the purpose(s) of such membership or affiliation;

(d) State whether such purpose(s) was/were accomplished;

(e) If not still a member, state the nature of your leaving (i.e., resignation, expiration of membership, expulsion, or whatever);

(f) If expulsion or resignation under disciplinary circumstances, state the charge(s);

(g) If charges were in writing, please provide a copy.

131. State whether any American Political Items Collectors (APIC) button convention attendees have made complaints about the behavior of Earl F. Dodge at button conventions;

- (a) If so, state what type of complaint(s) was/were made;
- (b) State who made such complaint(s);
- (c) State the disposition of such complaint(s);
- (d) State the name(s) of the complaint disposing personnel.

132. State whether any button or political collectibles items sellers via Ebay and package delivery services, have made complaints about the behavior of Earl F. Dodge with respect to his claims of alleged non-receipt of shipments;

- (a) If so, state what type of complaint(s) was/were made;
- (b) State who made such complaint(s);
- (c) State the disposition of such complaint(s).

ANSWER:

133. State the position in the PNC held by Willard Dean Watkins of Arizona in the period 1999-2003.

ANSWER:

134. State whether Willard Dean Watkins resigned ahead of his term's normal four year expiration;

- (a) If so, state the reason(s) provided by Mr. Watkins for his resignation;
- (b) State whether you dispute those reason(s);
- (c) If you do disagree with them, state the areas of such disagreement by you;
- (d) If any such disagreement on your part is in writing, please provide a copy.

ANSWER:

135. State whether you maintain one or more websites;

(a) State the name(s) of website(s) you maintain;

(b) State who pays for such website(s);

(c) State the sources of funds for such website(s);

(d) State specifically whether Pennock Trust Funds have been used since September 2003 for paying for such website(s).

ANSWER:

136. State the year you first became PNC Chairman;

(a) State the number of PNC members that year;

(b) State the number and names of recognized state organizations that year.

ANSWER:

137. State the names, addresses, and telephone numbers of the PNC members as of July 1999 as announced in *The National Statesman* as having been selected at the convention that year:

ANSWER:

138. State the number of PNC members that you recognize at this time, and their names, addresses, and telephone numbers.

ANSWER:

139. State whether during the year 2002, you were aware that Don Webb attempted to convene a PNC meeting by obtaining signatures on a petition pursuant to the PNC Bylaws "Section 3" ten signatures clause;

(a) If so, state how and when you became aware.

ANSWER:

140. State whether during the year 2002, you were aware that the effort by Don Webb to convene a PNC meeting by obtaining ten signatures on a petition failed;

(a) If so, state how and when you became aware.

ANSWER:

141. State whether in the year 2002, you expected that the effort by Don Webb to convene a PNC meeting by obtaining ten signatures on a petition would fail;

(a) If not, state your reason(s).

ANSWER:

142. State whether during the year 2003, you were aware that Don Webb attempted to convene a PNC meeting by obtaining signatures on a petition pursuant to the PNC Bylaws "Section 3" ten signatures clause;

(a) If so, state how and when you became aware.

143. State whether in the year 2002, you expected that the effort by Don Webb to convene a PNC meeting by obtaining ten signatures on a petition would succeed;

(a) If so, state your reason(s).

ANSWER:

144. State whether during the year 2003, you expected that the effort by Don Webb to convene a PNC meeting by obtaining ten signatures on a petition pursuant to the PNC Bylaws "Section 3" ten signatures clause, would again fail;

(a) If so, state your reason(s).

145. State whether during the year 2003, you expected that the effort by Don Webb to convene a PNC meeting by obtaining ten signatures on a petition pursuant to the PNC Bylaws "Section 3" ten signatures clause, would succeed;

(a) If so, state your reason(s).

ANSWER:

146. State whether you approved Margaret Shickley's refusal of Don Webb's request that she issue notice for the September 2003 Tennessee meetings which you allege "organized a new group";

(a) If so, state when you approved, i.e., before or after her refusal, and the specific date of your approval;

(b) State whether your approval was in writing;

(c) If so, so state, and please provide a copy

(d) If your approval was not in writing (e.g., verbal), please so state

ANSWER:

147. State whether you contacted PNC members to urge them not to sign the 2002 petition for PNC meeting;

(a) If so, state whom you so informed and when.

ANSWER:

148. State whether you contacted PNC members to urge them not to sign the 2003 petition for PNC meeting;

(a) If so, state whom you so informed and when.

ANSWER:

149. State whether you received a copy of Margaret Shickley's refusal to issue the notice for the September 2003 meetings at issue in this litigation;

(a) If so, state when you received it.

ANSWER:

150. State whether you received a copy of Don Webb's correspondence to Margaret Shickley which led to her refusal to issue the notice for the September 2003 meetings at issue in this litigation;

(a) If so, state when you received it.

ANSWER:

151. State whether you believe that if Mrs. Shickley had issued meeting notice pursuant to the petitions gathered pursuant to the PNC Bylaws ten signature clause for the September 2003 meetings at issue in this litigation, her doing so would have violated PNC Bylaws;

(a) If you so believe, please state your reason(s) for such belief, citing specific Bylaws.

ANSWER:

152. State whether you believe that if Mrs. Shickley had attended the September 2003 Tennessee meetings at issue in this litigation, her doing so would have violated PNC Bylaws;

(a) If you so believe, please state your reason(s) for such belief, citing specific Bylaws.

ANSWER:

153. State whether you believe that Mrs. Shickley had a copy of the PNC members' names and addresses sufficient to have issued notice for the September 2003 meetings at issue in this litigation;

(a) State your reason(s) for your answer.

ANSWER:

154. State whether you received a copy or copies of the petition correspondence seeking signatures pursuant to the PNC Bylaws ten signature clause, to convene the September 2003 meetings at issue in this litigation;

(a) State from whom you received the copy (or copies);

(b) State when you received the copy (or copies).

ANSWER:

155. State whether you received from Don Webb or anyone a copy of a notice stating that sufficient signatures had been obtained pursuant to the PNC Bylaws ten signature clause, so as to convene the September 2003 meetings at issue in this litigation;

(a) If so, state your reaction to said notice;

(b) If in writing, please provide a copy.

ANSWER:

156. State whether you refused to accept correspondence from Don Webb from and after June 2003, which correspondence might have included a notice stating that sufficient signatures had been obtained pursuant to the PNC Bylaws ten signature clause, so as to convene the September 2003 meetings at issue in this litigation;

ANSWER:

157. State whether you believed that you could prevent the September 2003 meetings by refusing to accept notice;

(a) If you so believed, please state the Bylaws clause(s), if any, in support of your belief.

ANSWER:

158. State whether Paul Scott, Jerry Kain, Karen Thiessen, Howard Lydick, Margaret Shickley, Faith Nelson, have discussed or corresponded with you in any way not elsewhere covered herein, concerning the validity of the September 2003 meetings at issue in this litigation;

(a) If so, please indicate what was said, and if in writing, please provide a copy.

ANSWER:

159. State whether Paul Scott, Jerry Kain, Karen Thiessen, Howard Lydick, Margaret Shickley, and/or Faith Nelson, informed you that they, or any of them, would not attend the September 2003 meetings at issue in this litigation.

(a) If so, state when you were so informed, and by whom;

(c) If their informing to that effect was in writing, so state, and please provide a copy.

ANSWER:

160. State whether Paul Scott, Jerry Kain, Karen Thiessen, Howard Lydick, Margaret Shickley, and/or Faith Nelson, has/have raised the issue of whether the September 2003 Tennessee meetings at issue in this litigation, might have been convened pursuant to the PNC Bylaws ten signature clause;

(a) If so, state when they (meaning each of them individually) raised the issue;

(b) If in writing, so state, and please provide a copy.

ANSWER:

161. State whether Paul Scott, Jerry Kain, Karen Thiessen, Howard Lydick, Margaret Shickley, and/or Faith Nelson, has/have raised the issue of whether the September 2003 Tennessee meetings at issue in this litigation, might have been convened pursuant to the PNC Bylaws “biennial” meeting clause;

(a) If so, state when they (meaning each of them individually) raised the issue;

(c) If in writing, so state, and please provide a copy.

162. If Paul Scott, Jerry Kain, Karen Thiessen, Howard Lydick, Margaret Shickley, and/or Faith Nelson, has/have raised the issue with you of whether the September 2003 Tennessee meetings at issue in this litigation, might have been convened pursuant to the PNC Bylaws ten signature clause or the “biennial” meetings clause, please state your response(s) to them or any of them, or, if in writing, so state, and please provide a copy.

ANSWER:

163. State whether you are aware of any contact by Margaret Shickley with Paul Scott, Jerry Kain, Karen Thiessen, Howard Lydick, and/or Faith Nelson, informing them, or any of them, of her refusal to issue the meeting notice sought by the Petitions obtained in 2003 pursuant to the PNC Bylaws ten signature clause;

(a) If so, state when this happened;

(c) If in writing, please provide a copy;

ANSWER:

164. State whether you were informed by Paul Scott, Jerry Kain, Karen Thiessen, Howard Lydick, Margaret Shickley, and/or Faith Nelson, of receipt of notice of the September 2003 meetings;

- (a) If so, please identify what you were told;
- (b) State the date(s);
- (c) If in writing, please so state, and provide a copy;

165. State whether you informed Paul Scott, Jerry Kain, Karen Thiessen, Howard Lydick, Margaret Shickley, and /or Faith Nelson, that

- (a) You received notice of the September 2003 Tennessee meetings if you did;
- (b) That (if you did not receive it) you have a practice of refusing mail from Don Webb;
- (c) That the September 2003 meetings at issue might have been convened pursuant to the PNC Bylaws ten signature clause;
- (d) That the September 2003 meetings at issue might have been convened pursuant to the PNC Bylaws “biennial” meeting clause.

ANSWER:

166. If you have informed Paul Scott, Jerry Kain, Karen Thiessen, Howard Lydick, Margaret Shickley, and /or Faith Nelson, of any aspect in **165** above, please state when and how you did so, and if in writing, please provide a copy.

ANSWER:

167. State the year you took physical possession of the Prohibition historical collection.

ANSWER:

168. State whether an inventory of the Prohibition historical collection existed when you took physical possession;

(a) If so, so state, and please provide a copy.

ANSWER:

169. If no inventory existed when you took possession of the Prohibition historical collection, state whether you did or arranged one;

(a) If so, please so state, and provide a copy;

(b) If no inventory was taken at that time, please state the reason(s).

ANSWER:

170. State whether a current inventory exists of the Prohibition historical collection of which you have physical collection;

(a) If so, please so state and provide a copy.

ANSWER:

171. If no current inventory exists of the Prohibition historical collection of which you have physical collection, please state the reason(s) for not having an inventory.

ANSWER:

172. State whether an inventory has been taken during any of the years since you took possession of the Prohibition historical collection;

(a) If any have been taken, please provide a copy of each such inventory.

ANSWER:

173. If no inventories have been taken during any of the years since you took possession of the Prohibition historical collection, please state the reason(s).

ANSWER:

174. If no inventories exist of the Prohibition historical collection, please state the current contents of the Prohibition historical collection.

ANSWER:

175. State whether Robert A. Carpenter is your personal attorney, the representative of others, the representative of the PNC (in your view of the membership thereof), or some combination thereof. If others, state names.

ANSWER:

176. State who approved the retaining of Robert A. Carpenter;

(a) State when that approval occurred;

(b) State whether that approval is in writing;

(c) If so, please so state, and provide a copy.

ANSWER:

177. State whether Pennock Trust fund money is being or is expected to be used to pay for the services of Robert A. Carpenter.

ANSWER:

178. State whether any Prohibition-related funds or assets are being, or are expected to be, used to pay for the services of Robert A. Carpenter, and if so, state which funds or assets.

ANSWER:

179. State who, if anyone, gave permission to engage in the correspondence to the PNC Bank, N.A., listed in its Petition Exhibit B.

(a) State whether that permission was in writing, and if so, please provide a copy.

ANSWER:

180. State the month and date when you first learned of the litigation in this case.

ANSWER:

181. State who notified you of the litigation in this case.

ANSWER:

182. State how you were first notified of the litigation in this case.

(a) If in writing (other than by the case itself), please provide a copy.

ANSWER:

183. State whether you have ever declared personal bankruptcy;

(a) If so, please state when and where;

(b) Please state the court name and address, and the case number.

ANSWER:

184. State whether you or anyone on your behalf filed an Answer to the Petition herein;

(a) If so, state whether a copy of said Answer was served on the undersigned;

(b) If not so served, state the reason(s) for not making such service.;

(c) If you did not Answer the Petition herein, state your reason(s) for not answering, except those reasons (if any) and mental impressions, conclusions, or opinions respecting the value or merit of the claim or defense, or respecting strategy or tactics.

ANSWER:

185. State whether you or anyone on your behalf filed any documents other than an Answer in the Court in this case;

(a) If so, identify each such document, and state whether a copy was served on the undersigned.

ANSWER:

186. State whether you know of any person not previously identified in your Answers to the foregoing Interrogatories, who has knowledge of any discoverable matter with reference to any claim or defense of any party to this litigation. If so, as to each such person, please state:

(a) Name;

(b) Present or last known address;

(c) Occupation;

(e) Telephone number of person or witness; and

(f) Knowledge related to this matter possessed by each such person.

ANSWER:

187. Please identify each and every person involved in any way in the answering of these interrogatories.

ANSWER:

LEROY J. PLETTEN

By: _____

Leroy J. Pletten
Secretary, Prohibition National Committee
8401 18 Mile Road #29
Sterling Heights MI 48313-3042
(586) 739-8343
On behalf of the Prohibition National Committee

RESERVATION OF RIGHT

The Prohibition National Committee reserves the right to, upon completion of its investigation and discovery, and/or further court proceedings, file such additional or amended Interrogatories as may be appropriate in the then circumstances.

By: _____

Leroy J. Pletten
Secretary, Prohibition National Committee

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

CERTIFICATE OF SERVICE

I, Leroy J. Pletten, Secretary, Prohibition National Committee, do hereby certify that on this 30th day of November, 2005, I sent a true and correct copy of the foregoing INTERROGATORIES to the following by placing a copy of the same in the United States first-class mail, postage prepaid, addressed as follows:

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

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

Robert A. Carpenter
200 North Monroe Street
Media, PA 19063-2908

LEROY J. PLETTEN

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

Re: Petition No. 114-1937

30 November 2005

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

Dear Clerk of Court:

Enclosed for filing is the Interrogatories of the "Prohibition National Committee" (hereinafter "PNC" a.k.a. the "Webb group") Directed to Earl F. Dodge of the "Dodge group"

One full set is enclosed, and one first page for date-stamping and returning in the enclosed pre-addressed postage pre-paid envelope.

Also enclosed is a check for the filing fee.

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:

1 full set
1 first page (for time-stamping and returning)
1 return postpaid envelope
1 check