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

MOTION FOR SUMMARY DISPOSITION

Prohibition National Committee Secretary Leroy J. Pletten, for Motion for Summary Disposition, states as follows:

1. New evidence arose late Thursday afternoon 8 December 2005, i.e., the confession against interest of Earl F. Dodge of not having notified a PNC member, Gary R. Van Horn, of Dodge's June 2003 meetings at issue herein. (Pletten Affidavit, Enclosure 1).

2. The gravamen of the Trustee Bank Petition centers on the issue of whether there are two groups each called Prohibition National Committee (hereinafter "PNC"), one described in the Petition as the "Webb group" and the other as the "Dodge group."

3. The Petition is signed by Robert L. Altimore, Jr., of the PNC Bank, N.A., (name similarities are a coincidence without legal significance). Mr. Altimore lacks personal knowledge of the controlling events as he was not present at same.

4. The PNC Bank, N.A., by its agent or employee Mr. Altimore did not ascertain prior to filing litigation, the full extent of the facts in support of the "Webb group" petition, did not advise the "Webb group" of the full extent of the "Dodge group" allegations, refused the "Webb group" requests for full disclosure, proceeded to act on the "Dodge group" assertions, disregarded the "Webb group" facts and referencing of a century of pertinent parliamentary procedure precedents, failed to pursue adequate fact-finding, and recklessly filed this litigation while knowing its own self-inflicted inadequacies of fact-finding and case preparation

5. The Petition in essence presents the view that the PNC minority, styled "Dodge group," without notice to the "entire" PNC membership, without a quorum, without "disinterested" directors, in June 2003, somehow convened genuine meetings, and further, somehow re-elected Earl F. Dodge as Chairman, and cites no parliamentary procedure evidence for such viewpoint.

6. Basics of parliamentary procedure such as on notice and quorum are common knowledge even among grade school students and others familiar with the operations of clubs, groups, etc.

7. The Petition without explanation gives no credence to the "Webb group" data showing that it, the PNC majority, in September 2003 did not "organize a new group."

8. This issue of the "Webb group" having "organized a new group" is derived from "Dodge group" statements inventing the claim over a year after the fact, and dated in the period of 19, 22, 23, 25 November 2004, in Petitioner Exhibit B, P.045-P.051.

9. The Petition gives no credibility or apparent weight to the "Webb group"emails citing pertinent facts and parliamentary procedure principles and case law, but merely attaches them as its Exhibit C.

10. Instead, the Petition, without explaining how it arrives at its conclusions, gives full credence to the "Dodge group" claim that the "Webb group" in September 2003 somehow "organized a new group" even though said meetings were convened pursuant to the PNC's own Bylaws, pursuant to the time frame calling for a meeting in 2003, and pursuant to the obtaining of signatures, and even though no motion was even made to create a new group as nobody in the "Webb group" displayed any remote notion of even contemplating "organizing a new group" under the PNC name.

A. The Petition fails to cite the fact that the "Webb group" meetings were convened pursuant to the "ten signature" process of the PNC's own Bylaws (a copy of which the Petitioner included), if not automatically already due to occur.

B. Said Bylaws (a) show that said meetings were due, even overdue, in 2003, and (b) authorize the gathering of signatures to convene same.

C. The PNC Bylaws mandate "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").

D. The PNC Bylaws contemplate a quadrennial "nominating convention" (Trustee Exhibit B, P.052, "Membership and Service, Section 3 Period of Service").

E. The last prior "biennial meeting" had been in June 2001, and the last prior quadrennial "nominating convention" had been in June 1999.

F. The next such meetings were thus due around June 2003.

G. Convening organization meetings is a matter involving obeying an organization's own Bylaws and parliamentary procedure, within the context of applicable law and case law.

H. The triple duties pertinent in this litigation, include providing notice, having a quorum, and having "disinterested" directors, have been a part of parliamentary procedure for all time and/or established or upheld in over a century of case law.

11. The Petitioner's pretext for having filed the Petition consists of, *inter alia*, unsigned "Minutes" for Dodge's June 2003 private meetings, some newspaper clippings, some letters, and some unsworn statements lacking personal knowledge of the controlling facts by any of the signatories.

A. The signatories of the said statements lack evidence that the PNC majority "organized a new group," instead simply fabricated the claims without personal knowledge.

B. None of the said materials provided by the "Dodge group" to the PNC Bank, N.A., had permission from the Secretary, the undersigned, Leroy J. Pletten, for even being so provided.

12. On its face, it is evident that the "Dodge group" accusations were evidently swallowed whole by the Trustee Bank Petitioner, even though such claims that the majority "Webb group" "organized a new group" are claims contrary to fact, that the PNC Bank, N.A.., knew or should have known as contrary to fact, and by the exercise of due diligence, fiduciary duty, and basic banking and/or legal professionalism, not to mention simply applying even a child level knowledge (see paragraph 6 *supra*) of simple parliamentary procedure, would have been so known.

13. The said accusations by the "Dodge group" that the "Webb group" "organized a new group," in the statements at Petitioner Exhibit P.045-P.051 (by Earl Dodge, Karen Thiessen, Howard Lydick, Earl Dodge, Margaret Shickley, Faith Nelson, and Jerry Kain) were made by acting in concert in a continuing enterprise in and through several states, and transmitted across state lines.

14. The Petitioner Trustee PNC Bank, N.A., in turn continued this transmission process by itself further transmitting these claims that were or should have been known to be false, across additional state lines, e.g., across state lines between Pennsylvania to Florida, and between Pennsylvania to Michigan, inclusive.

15. The "Dodge group" had chose not to exercise legitimate options such as seeking judicial relief to have enjoined the September 2003 meetings, or to obtain judicial recognition of their alleged rights in a timely manner after said meetings occurred.

16. Instead, the "Dodge group" chose to fabricate the "organized a new group" story in a concerted manner in several states (California, Colorado, Missouri, Ohio, Pennsylvania, Texas) and to place said fabrications in interstate commerce across state lines, to the PNC Bank, N.A..

17. The transmissions across state lines come within the purview of pertinent federal laws such as18 USC § 1001, § 1341, and § 1961, and presumably laws of Pennsylvania and/or other states wherein the said statements originated.

18. Case law is a part of the public domain body of knowledge, is owned by the public, and ignorance—especially by the law's owner the public and members thereof— is not a defense, but a confession against interest, and a confession of negligence..

19. This case law includes precedents upholding the duties of providing notice, of having a quorum, and of having "disinterested" directors.

20. Earl F. Dodge knew and now currently admits that he did not notify "the entire membership of the National Committee." Indeed, and significantly immediately after the Thursday afternoon, 8 December 2005, Courtroom 8 actions, Mr. Dodge confessed against interest to not having notified Gary R. Van Horn, a member entitled to notice. (Enclosure 1, Pletten Affidavit).

21. The affidavit of Gary R. Van Horn complaining of said lack of notice is already in the record (and attached hereto for court convenience, Enclosure 3).

22. The previously filed affidavit of Lee. R. McKenzie likewise shows not having been notified (and attached hereto for court convenience, Enclosure 4).

23. Additional affidavits of not having been notified are in process.

24. The evidence for the "Dodge group" meetings, styled "Minutes" (in Petitioner Exhibit B, P.057 and P.059), is incomplete as minutes, is unsigned, is unauthorized by Secretary Leroy J. Pletten, and *prima facie*, against interest, shows the lack of a quorum, i.e., 7 of 27 members, without reaching the issue of whether the correct number was in fact the number elected in 1999 (see the newsletter Earl F. Dodge himself issued at the time (page 3 attached as Enclosure 2).

25. A quorum in parliamentary procedure is long known to mean a majority.

26. A majority of 27 in pure math is any fraction above 13.5, and with people (only whole numbers) means 14.

27. The private meetings Earl F. Dodge conducted in his home and church in the guise of being the requisite PNC meetings, by the "Dodge group's" own statements provided to the Petition Trustee Bank, lacked a quorum.

28. Karen Thiessen and Faith Nelson are daughters of Earl F. Dodge, hence, not "disinterested."

29. Karen Thiessen, Howard Lydick, Earl Dodge, Margaret Shickley, Faith Nelson, and Jerry Kain, having signed the claims fabricating that the PNC majority "organized a new group" without first-hand evidence, and contrary to the actual evidence, thus reveal themselves as not "disinterested," but apparently willing to sign whatever pleased Earl F. Dodge, regardless of the truth or falsity thereof, and without regard to their lack of personal knowledge of the events being so recklessly, arrogantly, and falsely described.

30. The private meetings Earl F. Dodge conducted in his home and church in the guise of being the requisite PNC meetings lacked an adequate number of "disinterested" directors to enable a quorum.

31. The PNC Bylaws contemplate a quadrennial "nominating convention" (Petition Exhibit B, P.052, "Membership and Service, Section 3 Period of Service").

32. The PNC Bylaws (Petition Exhibit P.053-P.054, "Meetings" article, "Section 1, Biennial Meeting," and "Section 3, Call of Committee") contemplate and provide for meetings including automatically ("biennial") and by "formal petition signed by ten members of the National Committee circulated among all members of the committee and specifying a place date and time . . ."

33. With respect to the ensuing signature drive, ensuring inviolability, signatures came from both undisputed members (chosen at the 1999 PNC meetings, Enclosure 2) and from among supposed selectee(s) by the "Dodge group" (inasmuch as the "Dodge group" is estopped from objecting to same).

34. The signature drive was gratuitous, as the requisite "biennial" and contemplated quadrennial meetings were due to occur by operation of Bylaws, without obtaining signatures.

35. Under the circumstances described herein, in the 25 October "Answer and Opposition" and already filed Affidavit and Exhibits in the record, and in view of the fact that the "biennial" and "quadrennial" events were due in any event, the "formal petition" with "ten" signatures method was used (in an abundance of caution to make doubly and absolutely certain beyond all doubt the legitimacy even though the events were due even without any signatures being secured), all with the express approval of the Dodge-anointed Secretary Leroy J. Pletten, and including even effort to secure approval from Earl F. Dodge and the predecessor Margaret Shickley (who refused cooperation, incidently further showing a lack of "disinterestedness").

36. It is averred that the petition documents (already in the record via Affidavit of Secretary Leroy Pletten and prior-filed Motion to Dismiss) speak for themselves.

37. No responses to the two Motions to Dismiss filed by the undersigned in November 2005 are known to have been filed., and are thus presumed to have been, and be, undisputed.

38. As the meetings were due anyway, and as the requisite ten signatures were obtained, it is clear that the signatories' intent, beyond all doubt, not merely beyond reasonable doubt, was that the resultant meetings not only would not "organize a new group," but that nobody even had such a notion in mind, indeed, the furthest possible thought from the mind of any of the signers.

39. The "Dodge group" at no time has claimed unawareness of the petition drive, nor of not being invited to attend and participate, nor of the ensuing September 2003 meetings, but instead reacted to the validly convened September meetings, by proclaiming to all its adherents and accessories, that they the "Dodge group" had "severed" from any connection with the Prohibition Party those involved in the September 2003 meetings!! (meaning *prima facie* the petition signers and meeting sponsors, attendees, supporters, and adherents.)

40. In essence, by their own rash action, the "Dodge group" ratified their minority status by severing the majority!

41. This Motion is being made without reaching anticipated issues of Mr. Dodge's personal conduct with respect to PNC internal affairs and to other organizations, e.g., the American Political Items Collectors (APIC), and/or individual members, raising issues of grave concern within the PNC and impacting on Mr. Dodge's personal credibility and promoting the Prohibition Party pursuant to the Pennock Will and Trust.

42. The pattern of false statements crossing state lines as made by the authors and signers of same as in turn compounded by Petitioner Bank's further transmitting same, brings the matter within the purview of federal laws such as 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.

43. Federal law 18 § 1964 goes on to specify triple damages where such predicate acts exist.

44. The record shows such predicate acts.

45. For the immediate disposition of the case, it is only necessary to reach issues of

A. the invalidity of the "Dodge group" meetings due to lack of notice, quorum, and/or "disinterested" directors, and/or

B. the validity of the "Webb group" meetings as already documented in the already-in-the-record Motions to Dismiss

and not to deal with the issue of damages, and/or triple damages, as same can be dealt with in subsequent proceedings.

WHEREFORE, this Motion requests that the Court

(1) DECLARE that the "Dodge group" meetings lacked validity due to lack of notice, quorum, and/or "disinterested " Directors;

(2) DECLARE that the resultant "Webb group" meetings were convened in strict adherence to the PNC's own Bylaws;

(3) DECLARE that this litigation was improvidently filed without due diligence having first been done;

(4) ORDER the PNC Bank, N.A., in its Trust capacity, to follow the instructions of the PNC Secretary, Leroy J. Pletten, as to disbursing the funds at issue;

(5) ORDER the PNC Bank, N.A., to recoup any funds paid to the "Dodge group" contrary to any instructions of the aforesaid Secretary Pletten;

(6) DISMISS the herein Petition with prejudice;

(7) AWARD triple damages pursuant to 18 USC § 1964;

(8) 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

(9) ORDER other, different, or additional relief as the Court in its discretion may determine.

Respectfully,

15 December 2005

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

Enclosures

15 December 2005

BRIEF IN SUPPORT OF MOTION FOR SUMMARY DISPOSITION

This Motion relies upon the material facts heretofore presented (including with the unanswered Motions to Dismiss) and herein presented, in the context of the U.S. Supreme Court decision showing that with respect to a

> "complete failure of proof concerning an essential element of the nonmoving party's case [that] necessarily renders all other facts immaterial" (with such failure here being not merely on an "essential element," but the entire gravamen of this frivolous litigation), thus "necessarily renders all of the other facts immaterial." *Celotex Corp* v *Catrett*, 477 US 317, 323; 106 S Ct 2548; 91 L Ed 2d 265 (1986).

Such action does "isolate and dispose of factually unsupported claims," 477 US, 323-324.

The U.S. Supreme Court cites parliamentary procedures issues as ancient law:

> "This has been the rule for all time. . . .,"*United States* v *Ballin*, 144 U.S. 1, 6-7; 12 S Ct 507, 36 L Ed 321 (1892) in turn alluding to *Brown* v *District of Columbia*, 127 U.S. 579, 586; 8 S. Ct. 1314; 32 L. Ed. 262 (1888), saying "If the major part withdraw [of an organization] so as to leave no quorum, the power of the minority to act is, in general, considered to cease."

A long line of case law (cited in the first Motion to Dismiss and for judicial economy sake not repeated here), shows that case law, like enacted law, a public domain matter, is in essence owned by the public, and the public (which includes the "Dodge group") is presumed, indeed, required, to know it. In this context, another Supreme Court decision is relevant, saying that it is not

> "unfair to require that one who deliberately goes perilously close to an area of proscribed conduct shall take the risk that he may cross the line." *Boyce Motor Lines, Inc* v *United States*, 342 US 337, 340; 72 S Ct 329, 331; 96 L Ed 367 (1952).

In context, this means Mr. Dodge and the "Dodge group," and their not doing notice to the "entire membership," meeting without having a quorum, displaying a lack of disinterestedness, etc.

I. THE JUNE 2003 "DODGE GROUP" MEETINGS LACKED DISINTERESTED DIRECTORS, THUS VITIATING OR VOIDING SAID MEETINGS.

It is undisputed that Mr. Dodge's daughters participated, and undisputed that the "Dodge group" signed the accusations alleging that the "Webb group" "organized a new group," without personal knowledge of the actual facts.

Pursuant to *Federal Life Ins. Co.* v *Griffin*, 173 111. App. 5, 19; 1912 Ill. App. LEXIS 354] (1912), "interested" directors cannot be counted. In that case, ten of 23 were disqualified, leaving only 13, when the quorum was 15, so there was no valid meeting. Significantly, the court said, "We think . . . that the act of the . . . interested directors in voting . . . must be held to be constructively fraudulent . . . 14 A. & E. Encyc. Of Law, 2nd Ed."

Pursuant to *Burton* v *Lithic Mfg. Co.*, 73 Ore. 605, 610-611, 144 Pac. 1149, 1151 (1914) , the count cannot properly included an "interested" member. At 73 Ore., 611, 144 Pac., 1151, "In New York it has been held that, where an interested director takes part in the passage of a resolution, the corporate act is vitiated whether his vote was essential to its adoption or not. Anderson v. Aronson, 3 How. Prac. N. S. (N.Y.) 216" (and additional citations omitted).

Pursuant to federal case law, e.g., *Enright* v *Heckscher*, 240 Fed. 863, 872-873; 153 C.C.A. 549 (1917), an "interested" director cannot be counted in determining a quorum; this fact can void an alleged quorum; any resolution is "a nullity, as there was no quorum present when it was adopted." The federal court goes on to list multiple citations of even earlier precedents (admittedly with some exceptions). The bottom line is, "A director so disqualified by personal interest loses, pro hac vice, his character as a director, and so cannot be counted," 240 Fed., 872.

Here, all countable participants in Dodge's June 2003 meetings were "interested," and not "disinterested," i.e., NONE can properly be counted. (Attendees Pletten and Clifton Powell were deemed guests when the June 2003 "Dodge group" meetings began.)

Modern federal case law, by the U.S. Supreme Court, applies the "disinterestedness" concept, e.g., in *Aetna Life Ins. Co.* v. *Lavoie*, 475 US 813; 106 SCt 1580; 89 L Ed 2d 823 (1986). That case involved applying the concept to <u>one</u> judge, a State Supreme Court judge with an apparent bias, and overturning an entire State Supreme Court decision!! A lack of disinterestedness violates constitutional rights under the Due Process Clause of the Fourteenth Amendment.

The bottom line here, is the federal precedents should be treated as controlling, as this matter has federal aspects, i.e., the undisputed mailing of the statements at issue across multiple state lines.

II. THE JUNE 2003 "DODGE GROUP" MEETINGS LACKED PRIOR NOTICE TO THE ENTIRE MEMBERSHIP, THUS VOIDING SAID MEETINGS.

This incorporates by reference the affidavits of Lee R. McKenzie (Enclosure 4), Gary R. Van Horn (Encl 3), and Leroy Pletten (the latter citing Dodge's 8 December 2005 admission against interest of not having notified Mr. Van Horn, Encl 1 and now 5), and other anticipated affidavits in process and to be filed.

Pertinent parliamentary procedure precedents, e.g., *Haines* v *Readfield* (1856) 41 Me 246 (1856), *Covert* v *Rogers*, 38 Mich 363 (1 Feb 1878), *Doyle* v *Mizner*, 42 Mich 332; 3 NW 968 (1879), *People ex rel Carus v Matthiessen,193* Ill App 328; 109 NE 1056 (1915), and *Zachary* v *Milin*, 294 Mich 622; 293 NW 770 (1940), show that if a member, even one member, is not provided notice, the meeting lacks validity. These precedents are both public record and in the case record (Trustee Bank Exhibit C).

Knowledge of legal duties is presumed in law; so Mr. Dodge must be deemed aware of the import of his admission against interest, i.e., the voiding of his meetings, and the forced necessity, pursuant to the PNC Bylaws, to convene the requisite "biennial" and contemplated "quadrennial" meetings, whether done with or without a ten-signatures petition drive. (For judicial economy sake, this petition data is not here reproduced. For it, see the first Motion to Dismiss.)

III. THE JUNE 2003 "DODGE GROUP" MEETINGS LACKED A QUORUM.

The data provided by the "Dodge group" (e.g., the "Minutes" P.057 and 059 of Trustee Exhibit B) giving rise to this litigation *prima facie* shows less attendees, certainly less signatories than a quorum, i.e., seven (7) vs at least a 27 member listing (and see Enclosure 2).

The duty of having a quorum is so basic that simply applying even alluding to this as public domain child level knowledge (see paragraph 6 of the Motion for Summary Disposition) of simple parliamentary procedure, would seem to serve or suffice to "brief" the matter.

But for the record, here are some examples of the case law saying this:

State v *Porter*, 113 Ind. 79, 14 N.E. 883 (1888), says a quorum is essential, and absent it, the meeting is void.

In re Gunn, 50 Kan. 155, 32 Pac. 948 (1893), says that those claiming to be authorized to act as a designated group, must show evidence, and have a quorum. The "Dodge group" have in fact, by their words against interest, shown the opposite!

State v *Porter*, 113 Ind. 79, 14 N.E. 883 (1888), says a quorum is essential or meeting is void.

Rails v *Wyand*, 40 Okla. 323, 138 Pac. 158 (1914) says the minutes must show proceedings to establish a session, and absent such evidence, there is no session. Here, the "Dodge group" "Minutes" are unsigned and show no valid session, as the numbers cited therein are significantly less than a quorum of the names listed as members, even discounting for the "Minutes" bias of omitting disfavored-by-Dodge members.

Dingwall v *Common Council*, 82 Mich. 568, 46 N.W. 938 (1890), says concerning a quorum, it is disgraceful to prevent one, and only emergency would justify it.

State v *Ellington*, 117 N.C. 159, 23 S.E. 250, 53 Am. S.R. 580, 30 L.R.A. 532 (1895), says a meeting must begin with a quorum, and a meeting must continue to have a quorum; and that quorum is a majority, here at least 14 of 27; and no quorum means no valid meeting.

The bottom line is that a quorum is essential throughout a meeting. *Christoffel* v *United States*, 338 U.S. 84, 69 S Ct 1447, 93 L Ed 1826 (1949), another federal precedent.

The "Dodge group" did not have one, and despite the fact of knowing of this matter almost a year before the PNC majority (November 2004 when they wrote the false statements at issue, of which the majority did not learn until served in mid October 2005 with this litigation), yet they have come forward with nothing to back up their claims, even despite both the Petition and PNC Motions should have sufficed to have alerted them of the necessity of filing responsive pleadings.

CONCLUSION

The Prohibition National Committee, in the interests of judicial economy, suggests that this frivolous litigation may be summarily decided upon the record as now hereby augmented, pursuant to the aforesaid concept shown in prior case law such as, e.g., *Melancon* v *Brown & Williamson Tobacco Corp*, 621 F Supp 567 (WD Ky, Louisville Div, 1985) (dismissal for failure to show a cause of action, without even awaiting an answer), without the necessity of burdening this Court with telephone calls, hearing(s), oral argument(s), additional motions, and/or trial.

Wherefore, in view of the facts presented, including undisputed ones, the relief cited in the Motion for Summary Disposition is warranted and should be granted.

Respectfully,

15 December 2005

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

Enclosures
1. Pletten affidavit on Dodge confession against interest
2. Page 3 of Dodge newsletter
3. Van Horn affidavit
4. McKenzie affidavit
5. Pletten affidavit in support of this Motion

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 hereby certify that on this date, 15 December 2005, I transmitted the Motion to Dismiss with self-contained Brief in Support, and Supporting Affidavit with Exhibits (PNC Petitions) and Affidavit in Support with exhibits (Petitions), 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

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

By: _____
Leroy J. Pletten, Secretary,
Prohibition National Committee

Re: Petition No. 114-1937

15 December 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 Motion for Summary Disposition with self-contained Brief in Support, and enclosures.

Three sets of documents are enclosed

a. one original for the record

b. one copy for the judge, and

b. one first page (without enclosures) 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