

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

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

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STATE OF INDIANA )  
                                  )SS  
COUNTY OF HENRY)

Sarah Ward, being first duly sworn, deposes and says

1. I am the President of the Woman's Christian Temperance Union (WCTU).
2. The WCTU is an organization founded in 1874 promoting Christian values including temperance.
3. The WCTU in the nineteenth century had a role in developing the Prohibition Party.
4. This cooperation continued for a century. As a temperance advocate, I was notified by the PNC "nominating conventions," and I attended and been involved in various convention activities.
5. I attended the 1999 PNC nominating convention and observed (a) that Dodge was re-elected for a four-year term to end in 2003; and (b) that the vote on retaining Dodge as a candidate was 9-8, a bare one vote margin.
6. During the tenure of Earl F. Dodge, the cooperation sadly declined. Dodge displayed some hostility, which in turn led to discontent by those favoring continued cooperation.
7. I favored resuming the cooperative era, and deemed that others agreed with my desire for restoring the past cooperation.
8. Dodge made evident to me that my attempts for restoring the former cooperative era were not welcome. Thus I was not notified of the "convention" in June, 2003, in Dodge's home and church.
9. I have attended and/or conducted many meetings in my career, and am thus well aware that genuine meetings require (not only pursuant to parliamentary procedure and court precedent, but simply human or Christian decency), both (a) notice to the members and (b) a quorum.

10. I received word and complaints from one or more disfavored PNC members that the so-called "Dodge group" of the PNC held rump meetings in June 2003 in Dodge's home and church with only a small minority of the entire membership in attendance.

11. This fact in context of other information and communications to me seeking my help to deal with this behavior by Earl F. Dodge, encouraged me to believe that the PNC majority, the so-called "Webb group," favored resuming the cooperative era, and would seek to set up and conduct genuine PNC meetings, as PNC Bylaws so clearly authorize and/or mandate.

12. When contacted in regard to actually doing this, I personally facilitated the process of the PNC majority convening genuine meetings by helping to arrange meeting areas in Tennessee.

13. I recognized and was pleased that Leroy J. Pletten, the Dodge-anointed "Secretary" from June 2003, was performing his duty of facilitating correspondence with the entire PNC membership notwithstanding Dodge's opposition, so as to enable genuine PNC meetings reflective of the will of the PNC majority, to occur pursuant to the PNC Bylaws.

14. I was in attendance at, and was made welcome at, all sessions of the PNC meetings and "nominating convention" in Tennessee in 2003 which meetings underlie issues in this litigation.

15. I observed that the goal of all attendees included restoring the old cooperation via the one, continuing, indivisible Prohibition National Committee.

16. Having seen Dodge's mere one-vote win in 1999 as a portent for the future, I observed that Dodge as might have been expected from the majority, was not re-elected in 2003 as Chairman. In recognition of his past services, he was voted Chairman Emeritus.

17. I was honored by being voted Honorary Chairman.

18. I deny that any attendee there "organized a new group." I observed no such event take place. Nobody there even made such a motion!

Respectfully,

Sarah Ward, President  
Woman's Christian Temperance Union  
33 North Franklin  
Knightstown, Indiana 46148-1221  
(765) 345-7600

Subscribed and sworn before me, this  
\_\_th day of November, 2005, a Notary  
Public in and for Henry County, Indiana

Hello Sarah:

Thank you for your help.

Changes made as requested, and this morning, for spacing purposes, slight renumbering. Please re-review to make sure these are genuinely your words and thoughts.

Once acceptable to you in full, please have it notarized with your signature, and have it embossed including with the metal stamp that perforates the paper, for going out of state. It'd be nice if you could get more than one original so treated, meaning three originals: one for

- a. the judge,
  - b. the clerk of court, and
  - c. my PNC official record
- (of course, d. a 4<sup>th</sup> for yourself if you wish.)

Once it is final, I will send you a pdf version, and/or post it on the Internet for downloading direct onto paper, if more convenient.

Thank you.

Leroy

-----Your edit email concerning the original version-----

Dear Leroy,  
I can't add corrections to your copy but here they are.

The organization is Woman's (singular) it is at the beginning and again at the end.

Henry is my County. WCTU was organized in 1874.

#12 - I would prefer you delete "shocking" in describing Dodge's behavior and I think less rhetoric at the end would be better also. Let's just keep to the facts.

I had been away at our Nat. Headquarters for meetings but am home now and ready to sign the affidavit. Remind me of the extra stamp or whatever I need when notarizing it. Keep up the good work.

Sarah