

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

No. 114-1937

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

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

STATE OF ARIZONA)
)SS
COUNTY OF PIMA)

Willard Dean Watkins, being first duly sworn, deposes and says:

1. I was a former member of the Prohibition National Committee (PNC), serving as Vice-President from 1999-2001.

2. My term had run from 1999-2003 just as did that of the other officers including Earl. F. Dodge (Chairman). These terms would routinely have expired in 2003 at the end of their four year period.

3. I resigned my position in 2001 because I was no longer willing to deal with the poor "management style" by Earl F. Dodge and because of his reticence, and the reticence of the secretary of the PNC, to share information with me that I deemed necessary to be effective in my position as vice-chairman. My reasons for resigning, among others, are as follows:

A. Meeting announcements were not sent to members of the PNC in advance of a scheduled meeting.

B. Proposed agenda items for the meeting were not sent in advance.

C. Minutes of the previous meeting were not composed in a timely manner and were not distributed to the attendees prior to the next subsequent meeting, nor were they available on request to either Earl F. Dodge or the secretary.

D. The financial reports were not detailed.

E. Insufficient time was allocated at the PNC meeting for discussions of items on the agenda or for presentation of new business which may have arisen at the meeting.

F. The chairman of the PNC (Earl F. Dodge) acted as Treasurer, although the by-laws of the PNC make no provision for holding dual offices. Earl F. Dodge wrote the checks for the operation of the PNC. Although there was an elected Treasurer, the office was in name only.

4. Due to my experiences in dealing with Earl F. Dodge, it is my firm opinion that he should no longer be in control of the PNC.

Respectfully,

Willard Dean Watkins

Willard Dean Watkins
3720 E. Esperero Cyn. Pl.
Tucson, AZ 85718-2307
(520) 529-8436

Subscribed and sworn before me this 28th day of November, 2005,
by WILLARD DEAN WATKINS.

Veronica W. Fung 10-20-2007
Notary Public My Commission Expires: