

**STATE OF NEW HAMPSHIRE  
DEPARTMENT OF STATE  
BUREAU OF SECURITIES REGULATION**

---

**IN THE MATTER OF:**

Local Government Center, Inc.; Local  
Government Center Real Estate, Inc.;  
Local Government Center HealthTrust;  
LLC; Local Government Center  
Property-Liability Trust, LLC;  
HealthTrust, Inc.; New Hampshire  
Municipal Association Property-Liability  
Trust, Inc.; LGC-HT, LLC; Local  
Government Center Workers'  
Compensation Trust, LLC; and the  
Following individuals: Maura Carroll,  
Keith R. Burke, Stephen A. Moltenbrey,  
Paul G. Beecher, Robert A. Berry,  
Roderick MacDonald, Peter J. Curro,  
April D. Whittaker, Timothy J. Ruehr,  
Julia N. Griffin, Paula Adriance, John  
P. Bohenko, and John Andrews

Case No.: C-2011000036

---

**OBJECTION OF RESPONDENTS LOCAL GOVERNMENT CENTER, INC. , et al  
TO AMENDED MOTION TO INTERVENE REGARDING SEA; NEA-NH; AFSCME;  
AND AFT; AND REQUEST FOR HEARING**

Respondents Local Government Center, Inc. and affiliated entities (hereafter, "LGC") object to the Amended Motion to Intervene filed by counsel to the Professional Fire Fighters of New Hampshire (hereafter, "PFFNH"), and request a hearing on the Motion. In support thereof, LGC states the following:

1. On September 6, 2011, PFFNH filed a motion requesting permission to intervene in the Proceeding and to be considered an "interested party."
2. On September 21, 2011, counsel for PFFNH filed an Amended Motion to Intervene "to include additional organizations who seek counsel to represent them." More specifically, counsel for PFFNH listed the following organizations: State Employees'

Association of New Hampshire SEIU Local 1984 (“SEA”); National Education Association New Hampshire (“NEA-NH”); American Federation of State, County and Municipal Employees, Council 93 (“AFSCME”); and American Federation of Teachers New Hampshire (“AFT”).

3. The Amended Motion to Intervene specified no additional grounds other than those PFFNH previously set forth in its initial Motion to Intervene. Accordingly, LGC objects to the Amended Motion to Intervene, and incorporates by reference the factual and legal arguments set forth in its detailed Objection to PFFNH’s initial Motion to Intervene.

WHEREFORE, Respondents respectfully request that:

- A. The Presiding Officer set a date for a hearing to discuss the Amended Motion to Intervene, and similar motions by all other interveners;
- B. Following the hearing, the Presiding Officer deny the Amended Motion to Intervene; and
- C. The Presiding Officer grant such other relief as fairness and due process require.

Respectfully submitted,

Local Government Center, Inc.;  
Local Government Center Real Estate, Inc.;  
Local Government Center HealthTrust, LLC;  
Local Government HealthTrust, LLC;  
Local Government Center Property-Liability  
Trust, LLC;  
HealthTrust, Inc.;  
New Hampshire Municipal Association  
Property-Liability Trust, Inc.;  
LGC-HT, LLC;  
Local Government Center  
Workers' Compensation Trust, LLC; and  
Maura Carroll,

By Their Attorneys:  
PRETI FLAHERTY BELIVEAU &  
PACHIOS PLLP

Dated: October 3, 2011

By: /s/ Brian M. Quirk  
William C. Saturley, NHBA #2256  
Brian M. Quirk, NHBA #12526  
PO Box 1318  
Concord, NH 03302-1318  
Tel.: 603-410-1500  
Fax: 603-410-1501  
[bquirk@preti.com](mailto:bquirk@preti.com)

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 3rd day of October 2011, provided copies of the within Objection of Respondents Local Government Center, Inc. and Affiliated Entities to the Amended Motion to Intervene *via* electronic transmission to all counsel of record.

/s/ Brian M. Quirk