

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;
Health Trust, 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

**RESPONDENT JOHN ANDREWS' RESPONSE TO BSR'S MOTION FOR
PROTECTIVE ORDER AND CONFIDENTIAL TREATMENT**

Respondent John Andrews, by and through his counsel, Orr & Reno, P.A., responds to the New Hampshire Bureau of Securities Regulation's ("BSR") Motion for Protective Order and Confidential Treatment as follows:

1. Mr. Andrews does not object to the relief requested by the BSR or its proposed Order. However, neither the motion nor the proposed Order includes the individuals authorized to observe the BSR's examination pursuant to the Order on BSR's Request for On-Site Examination.

2. Accordingly, Mr. Andrews respectfully requests that the proposed Order be amended to include not only the BSR, but also the individuals authorized to observe

the BSR's examination pursuant to the Order on BSR's Request for On-Site Examination.

Respectfully Submitted,

JOHN ANDREWS

Date: 12/20/11

By: 

Michael D. Ramsdell, Esq. (NH Bar #2096)
Joshua M. Pantesco (NH Bar # 18887)
ORR & RENO, P.A.
One Eagle Square
P.O. Box 3550
Concord, NH 03302-3550
(603) 223-9185
mramsdell@orr-reno.com
jpantesco@orr-reno.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was forwarded this day via electronic mail to all counsel of record.


Michael D. Ramsdell, Esq.