

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

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)  
**IN THE MATTER OF:** )  
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**Local Government Center, Inc;** )  
**Local Government Center Real Estate, Inc;** )  
**Local Government Center Health Trust, 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-2011-0036**

**NOTICE OF JOINDER IN MOTIONS TO DISMISS**

NOW COMES Respondent, Peter J. Curro, by and through his counsel, Howard

& Ruoff, PLLC, and gives notice that he joins in the following motions to dismiss filed by

Respondents LGC, John Andrews, and Maura Carroll:

- Respondent John Andrews' Motion to Dismiss Counts III, IV and V of the Amended Petition, Securities Claims;
- Respondent John Andrews' Motion to Dismiss Count VI of the Amended Petition, Civil Conspiracy;
- Respondent Maura Carroll's Motion to Dismiss All Counts of the Amended Petition (only as to counts III, IV and V);
- LGC's Motion to Dismiss Counts III, IV and V of the Amended Petition on the Ground that LGC's Risk Pool Contracts are not Securities or are Exempt Under New Hampshire Law;

- LGC’s Motion to Dismiss Count I of the Amended Petition on the Ground that RSA 5-B does not Prohibit the Conduct in which LGC is said to have Engaged;
- LGC’s Motion to Dismiss Count II of the Amended Petition on the Grounds that the Bureau of Securities Regulations has Improperly Failed to Promulgate Rules Under RSA 5-B, and the Statute Unconstitutionally Delegates Unlimited Legislative Authority to the Bureau and is Unconstitutionally Vague; and
- LGC’s Motion to Dismiss Counts I & II of the Amended Petition to the Extent They Allege Conduct which Occurred Prior to June 14, 2010

Respectfully Submitted,  
Peter J. Curro,

By His Attorneys,  
HOWARD & RUOFF, PLLC

Dated: March 22, 2012

By: /s/ Mark E. Howard  
Howard & Ruoff, PLLC  
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**Certificate of Service**

I hereby certify that I have this 22<sup>nd</sup> day of March 2012, forwarded copies of the within Notice via electronic transmission to all counsel of record.

Dated: March 22, 2012

/s/ Mark E. Howard  
Mark E. Howard (NH Bar #4077)