

**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 Number: C-2011000036

**SUBPOENA DUCES TECUM TO TESTIFY AT A DEPOSITION  
AND TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS**

To: **Lisa Duquette, Executive Director  
New Hampshire School Healthcare Coalition (SchoolCare)  
370 Harvey Rd, Suite 4  
Manchester, NH 03103**

*Testimony:* **YOU ARE COMMANDED** to appear at the time, date, and place set forth below to testify at a deposition to be taken in this administrative action. If you are an organization that is *not* a party in this case, you must designate one or more officers, directors, or managing agents, or designate other persons who are knowledgeable about the subject matter requested in Exhibit A (attached) and who consent to testify on your behalf about the matters set forth in Exhibit A.

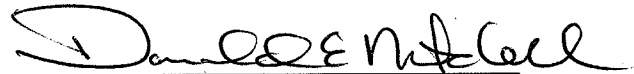
Place: **Preti Flaherty Beliveau & Pachios, PLLP  
57 North Main Street  
Concord, NH 03301**

Date and Time:  
**Monday April 2, 2012; 9:00 a.m.**

**Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material: **SEE ATTACHED EXHIBIT A.**

Date: March 26, 2012

DONALD E. MITCHELL, Esq.



Presiding Officer

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The names, addresses, E-mail addresses, and telephone numbers of the attorneys representing 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; and Local Government Center Workers' Compensation Trust, LLC, who, on behalf of these entities, requested this Subpoena, are:

William C. Saturley, NHBA #2256  
Brian M. Quirk, NHBA #12526  
PRETI FLAHERTY BELIVEAU & PACHIOS, PLLP  
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**PROOF OF SERVICE**

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**DATE:**

**PLACE**

**SERVED**

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**SERVED ON (PRINT NAME)**

**MANNER OF SERVICE**

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**SERVED BY (PRINT NAME)**

**TITLE**

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**DECLARATION OF SERVER**

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I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on \_\_\_\_\_

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**DATE**

**SIGNATURE OF SERVER**

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**ADDRESS OF SERVER**

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**EXHIBIT A**  
**DOCUMENTS REQUESTED**

The Deponent shall be required to have with him/her at the designated time, date, and place the following documents:

- All documents relating to the initial corporate formation and/or corporate structure of New Hampshire School Healthcare Coalition (hereafter referred to as "SchoolCare") and any affiliated entity, and any subsequent changes to the corporate formation and/or structure.
- Articles of Agreement and Bylaws of SchoolCare and any affiliated entity for calendar years 2003 through 2011.
- All documents that support SchoolCare's decision(s) to return surplus to members through rate reduction and/or stability for calendar years 2003 through 2011.
- All documents relating to the level of reserves held by SchoolCare and any related entity for calendar years 2003 through 2011.
- All documents relating to the surplus level held by SchoolCare and any related entity for calendar years 2003 through 2011.
- All documents that relate to the method of measuring and/or setting the level of reserves for SchoolCare's various risk pools.
- All documents that relate to the method of measuring and/or setting the level of the surplus for SchoolCare's various risk pools.
- All documents that relate to SchoolCare's calculations of reserves and surplus for calendar years 2003 through 2011.
- All reports from actuaries or similar professionals hired by SchoolCare that relate to the setting of appropriate reserves and/or surpluses for SchoolCare's calendar years 2003 through 2011.
- All documents listing expenditures by SchoolCare any affiliated entity for calendar years 2003 through 2011.
- Copies of all signed member agreements with SchoolCare for calendar years 2010 and 2011.
- Copies of all Board and Subcommittee Minutes for SchoolCare, including but not limited to Minutes of Board of Directors, Finance Committee and Risk Management Committee meetings, for the calendar years 2003 through 2011.
- Copies of all audited Financial Statements for SchoolCare for the calendar years 2003 through 2011.
- Any and all E-mails and any other written correspondence between the New Hampshire Bureau of Securities Regulation and SchoolCare from July 2009 through 2011.
- Any and all documents that relate to investments and securities made by SchoolCare for calendar years 2003 through 2011.