

STATE OF NEW HAMPSHIRE
DEPARTMENT OF STATE

IN THE MATTER OF:)
)
Local Government Center, Inc., et al.) C-2011000036
)
RESPONDENTS)
_____)

BSR'S EXHIBIT AND WITNESS LIST FOR REMAND HEARING

NOW COMES the Petitioner, the Bureau of Securities Regulation ("BSR"), by and through its attorneys, Bernstein, Shur, Sawyer, & Nelson, P.A., and submits the following Exhibit and Witness Lists in the event that an evidentiary remand hearing is necessary in this matter. The Petitioner offers the following:

Exhibits

1. Spreadsheet – All Groups that Ceased Any Coverage – 6/23/16.
2. Spreadsheet – Former Members.
3. Spreadsheet – 2014 Members that Ceased Medical or Dental Coverage Lines.
4. Spreadsheet – Total Owed to Former Members and 2014 Members that Ceased Medical or Dental Coverage Lines.
5. HT Breakdown of \$17,100,000.00 Return.
6. Rebuttal Exhibits, including but not limited to, Membership Agreements.

The Petitioner reserves the right to submit additional exhibits as may be necessary upon reasonable notice to opposing counsel.

Witnesses

Adrian Laroche, Bureau of Securities Regulation.

Wendy Parker, George Tsopiras, and/or other representative from HealthTrust.

Officials from any municipality or political subdivision included in Exhibits 2 or 3.

Rebuttal Witnesses.

The Petitioner reserves the right to identify and call additional witnesses as may be necessary upon reasonable notice to opposing counsel.

Respectfully submitted,

The Bureau of Securities Regulation,
By its attorneys,

Bernstein Shur, P.A.




Date: June 24, 2016

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this Exhibit and Witness List upon all interested parties through the electronic filing system in place in this matter this 24th day of June, 2016.



Roy W. Tilsley, Jr., Esq.