

STATE OF NEW HAMPSHIRE
DEPARTMENT OF STATE

IN THE MATTER OF:

Local Government Center, Inc.;
Local Government Center Real Estate, Inc.;
Local Government Center Health Trust, 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 A. Griffin; and John Andrews

Case No: C2011000036

RESPONDENTS

**MOTION FOR VOLUNTARY NONSUIT AS TO RESPONDENTS TIMOTHY
RUEHR, JULIA GRIFFIN, APRIL WHITTAKER, KEITH BURKE, AND PAUL
BEECHER ONLY**

NOW COMES the Petitioner in the above-referenced matter, the Bureau of Securities Regulation, by and through its attorneys, Bernstein, Shur, Sawyer, & Nelson, P.A., and moves to dismiss the action against TIMOTHY RUEHR, JULIA GRIFFIN, APRIL WHITTAKER, KEITH BURKE, AND PAUL BEECHER by entering a Voluntary Nonsuit against each of them alone, stating as follows:

1. Pursuant to an Agreement with the above referenced Respondents, the Bureau has agreed to seek a voluntary nonsuit against them. As part of said agreement, each party is releasing any claims that it may have for fees and/or costs in this matter against

the other and these Respondents voluntarily agree not to serve on any Board of Directors for any of the entities named as respondents in Docket No. C-2011000036 or for any other pooled risk management program formed under RSA 5-B until such time as the matters presented in Docket No. C-2011000036 have concluded, either by way of settlement or final adjudication, or until February 13, 2014, whichever occurs sooner. The Respondents' agreement to these obligations does not constitute an admission of wrongdoing and is entered into merely to bring peace and end this litigation.

2. Accordingly, the Bureau moves that the Hearings Officer enter a Voluntary Nonsuit as to the allegations made against TIMOTHY RUEHR, JULIA GRIFFIN, APRIL WHITTAKER, KEITH BURKE, AND PAUL BEECHER in this matter.

3. The Bureau otherwise maintains all claims that it has against all other parties to this enforcement action, including claims for fees, costs and other relief.

WHEREFORE, the Petitioner prays that the Hearings Officer:

A. Grant this Motion for Voluntary Nonsuit as to the individual Respondents, TIMOTHY RUEHR, JULIA GRIFFIN, APRIL WHITTAKER, KEITH BURKE, AND PAUL BEECHER only.

B. For such other and further relief as may be just.

Respectfully submitted,

Bureau of Securities Regulation
By and Through Their Attorneys,
Bernstein, Shur, Sawyer & Nelson, PA

February 28 2012

By: 
for Andru H. Volinsky, Esq., (#2634)
Bernstein, Shur, Sawyer & Nelson, PA

February 28 2012

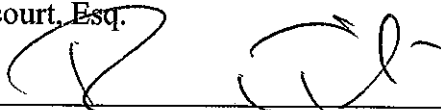
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By: 

Roy W. Tilsley, Jr., Esq. (#9400)
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CERTIFICATION OF SERVICE

I, Andru H. Volinsky, hereby certify that a copy of the Motion for Voluntary Nonsuit as to Respondents Roderick MacDonald and Stephen Moltenbrey Only, was this date, forwarded to Jeffrey D. Spill, Esq., Earle F. Wingate, III, Esq., Kevin B. Moquin, Esq., Eric Forcier, Esq., Adrian S. Larochelle, Esq., William C. Saturley, Esq., Brian M. Quirk, Esq., David I. Frydman, Esq., Michael D. Ramsdell, Esq., Joshua M. Pantesco, Esq., Mark E. Howard, Esq., and Jaye L. Rancourt, Esq.



Andru H. Volinsky, Esq.
