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June 6, 2014

Barry J. Glennon, Director
Bureau of Securities Regulation
NH Department of State
107 North Main Street, #204
Concord, NH 03301-4989

**Re: In the Matter of: Local Government Center, Inc., et al
C-2011000036**

Dear Director Glennon:

Enclosed please find a Motion to Intervene for Limited Purpose of Being Heard on Question of Repayment of Funds in the above-referenced matter for filing with the Bureau.

Thank you for your attention to this matter.

Sincerely,



Richard J. Lehmann

RJL:dae

Enclosure

cc: Clients
Counsel of record (via email)

**STATE OF NEW HAMPSHIRE
DEPARTMENT OF STATE**

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

**MOTION TO INTERVENE FOR LIMITED PURPOSE OF BEING HEARD ON
QUESTION OF REPAYMENT OF FUNDS**

NOW COME the Towns of Salem, Peterborough, Meredith, Bennington, Plainfield and Temple, and respectfully request to intervene in this matter for the limited purpose of being heard on the matter of the distribution of the excess surplus, and in support thereof state as follows:

1. On or about June 3, 2014, respondent filed a pleading entitled “Healthtrust’s Notice Of Termination Agreement Terminating Settlement Agreement.”

2. In paragraph 5 of that pleading, Healthtrust stated the following: “Although not stated in the Termination Agreement because it is a unilateral determination made by the HealthTrust Board of Directors, subject to the Presiding Officer’s and BSR’s approval, HealthTrust will distribute the \$17.1 million to its current members or another identified combination of current and former HealthTrust members.”

3. The proposed intervenors are former member Towns that contributed to the excess surplus found to exist during these administrative proceedings. As such, RSA 5-B anticipates that they will share in the refund of this excess. However, if this surplus is returned only to

current members of Healthtrust, the result will be a gross injustice and a violation of the letter and spirit of RSA 5-B.

4. The proposed intervenors request to intervene solely for the purpose of proposing a fair distribution of the excess surplus. Specifically, the intervenors will argue that an injustice will occur if the accumulated surplus is distributed to members based on current membership rather than based upon contributions to the accumulated excess surplus. Further the intervenors will argue that Intervenor(s) will not be taking any position(s) in this proceeding concerning the status of Healthtrust or the regulatory actions proposed by the Bureau of Securities Regulation nor are they seeking to generally participate in those matters.

5. Counsel for LGC, Michael Ramsdell, takes no position on this motion. At the time of filing, Andru Volinsky, counsel for the Bureau of Securities Regulation had not indicated his objection or assent to this motion.

WHEREFORE, the Towns of Salem, Peterborough, Meredith, Bennington, Plainfield and Temple respectfully request that they be permitted to intervene for the limited purpose of presenting a proposed distribution.

RESPECTFULLY SUBMITTED
The Towns of Salem, Peterborough,
Temple, Plainfield, Meredith and
Bennington,
BY THEIR ATTORNEYS,
DOUGLAS, LEONARD & GARVEY, P.C.



Richard J. Lehmann (Bar No. 9339)
14 South Street, Suite 5
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(603) 224-1988

June 6, 2014

CERTIFICATE OF SERVICE

I certify that I have forwarded copies of this pleading to counsel of record via email.

/s/Richard J. Lehmann
Richard J. Lehmann (Bar No. 9339)