

STATE OF NEW HAMPSHIRE
DEPARTMENT OF STATE

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

**BUREAU OF SECURITIES REGULATION’S OBJECTION TO THE
SUMMARY JUDGMENT SOUGHT BY RESPONDENTS**

NOW COMES Petitioner, the New Hampshire Bureau of Securities Regulation (the “Bureau”), a part of the Corporations Division within the Department of State, by and through counsel, Bernstein, Shur, Sawyer & Nelson, P.A., and respectfully objects to the Respondents’ Motion for Summary Judgment, stating as follows:

1. The Bureau objects to the Respondents’ motion for summary judgment.
2. A memorandum of law in support of this objection to the Respondents’ motion for summary judgment has been filed along with this motion and is incorporated herein by reference.

PRAYER FOR RELIEF

WHEREFORE, the Bureau respectfully requests that the Presiding Officer:

- A. Deny Respondents’ Motion for Summary Judgment;
- B. Grant such other and further procedural and substantive relief as may be just and proper.

Respectfully submitted,

The Bureau of Securities
Regulations
State of New Hampshire
By its attorneys,
Bernstein, Shur, Sawyer
& Nelson, P.A.

Dated this 3rd day of June, 2014

/s/ Andru H. Volinsky
Andru H. Volinsky No. 2634
Roy W. Tilsley, Jr. No. 9400
Christopher G. Aslin No. 18285
PO Box 1120
Manchester, NH 03105-1120

/s/ Adrian LaRochelle
The Bureau of Securities Regulation
Adrian Larochelle, Staff
Attorney, No. 20350

Certificate of Service

I hereby certify that I have served a copy of this motion upon counsel for the LGC successor entities by U.S. Mail and electronically this 3rd day of June, 2014, those counsel being Bruce Felmly, Esq., Michael D. Ramsdell, Esq., David I. Frydman, Esq., Patrick Closson, Esq., Peter Baylor, Esq., J. David Leslie, Esq., and Joel Emlen, Esq.

/s/ Andru H. Volinsky