

COMPLAINT TO THE NEW HAMPSHIRE ATTORNEY DISCIPLINE OFFICE

Respondent: Attorney Tim Bush
Chairman of the Nashua Ethics Review Committee
Wilson, Bush and Keefe
378 Main St.
Nashua, NH 03060

Complainant: Laurie Ortolano
41 Berkeley St.
Nashua, NH 03064
lauricortolano@gmail.com

Date of Filing: December 11, 2025

I. OVERVIEW OF CONDUCT

This complaint alleges that Attorney Tim Bush, while acting in a quasi-judicial capacity as Chairman of the Nashua Ethics Review Committee (ERC), has engaged in a pattern of severe misconduct spanning multiple proceedings (May 15, 2025, and December 4, 2025). This conduct violates the Rules of Professional Conduct through a lack of impartiality, misuse of official records, improper ex parte communication, and issuing personal threats.

II. RELEVANT RULES OF PROFESSIONAL CONDUCT VIOLATED

The following Rules of Professional Conduct appear to be violated by Attorney Bush's conduct:

- **Rule 8.4(c): Misconduct – Dishonesty, Fraud, Deceit or Misrepresentation.** (For knowingly using inaccurate court records in a public forum).
- **Rule 8.4(d): Misconduct – Conduct Prejudicial to the Administration of Justice.** (For abuse of process, encouraging litigation, and facilitating unequal access to information).
- **Rule 3.5(b): Impartiality and Decorum of the Tribunal – Communicate ex parte with a judicial official.** (For seeking negative records from City Counsel for use against a private citizen).
- **Rule 3.5(d): Impartiality and Decorum of the Tribunal – Engaging in conduct intended to disrupt a tribunal.** (For hostile and threatening language).

III. STATEMENT OF FACTS AND EVIDENCE

The following facts are verifiable by the official verbatim minutes of the ERC meetings and confirmed communications:

A. Pattern of Misconduct: May 15, 2025 ERC Meeting (Fred Teeboom Complaint)

Exhibits: Attached as A Teeboom Compliant Exhibits A-E

- A. May 15, 2025 ERC Meeting Minutes
- B. Muccioli Order

- C. Amended Order striking part of footnote
- D. Emails between ERC Clerk Perrin, the legal office and Bush.
- E. Affidavit of Fred Teeboom

Witness: I am requesting the ADO call Attorney Robert Sullivan as a witness. Attorney Sullivan no longer works as the City of Portsmouth Senior Counsel. He has retired. Nashua, Bush and the City have refused to provide his email address to me. I have requested they forward my emails and communications to Attorney Sullivan, but I have no confirmation that they are doing so.

Chairman Bush used his official position to introduce false accusations and misleading records to publicly humiliate the Complainant, who was not the respondent in the Teeboom matter.

1. **Deliberate Misuse of Inaccurate Judicial Records (Rule 8.4(c)):**
 - o Chairman Bush publicly read a struck-out portion of a footnote from a court order (*Muccioli v. City of Nashua*) into the record to accuse the Complainant of violating RSA 311:7, practicing as an attorney without a license.¹
 - o Chairman Bush obtained these records from the City Legal Office and confirmed during the meeting, when Complainant questioned him during a break, that **he knew the record was inaccurate and contained a struck-out portion.**²
 - o Chairman Bush pre-planned this unwarranted attack asking the Ethic's Review clerk to have copies of the Court order available to give out to the public that evening. He scolded me during the hearing announcing that my conduct was a problem and accusing me of advising him during the meeting.
 - o He publicly stated he would correct the record if given the corrected order. The Complainant provided the correct order, but Chairman Bush failed to acknowledge receipt or correct the public record, constituting a knowing use of misinformation to prejudice a citizen.
2. **Improper Public Accusation and Practice of Law Claim (Rule 8.4(d)):**
 - o Chairman Bush publicly and falsely accused the Complainant of **violating RSA 311:7 (unlicensed practice of law)** by assisting Mr. Teeboom. This accusation was made without evidence, procedural notice, or a formal motion, constituting an abuse of authority used for the purpose of public humiliation.
 - o Chairman Bush accused Complainant of writing Mr. Teeboom's complaint. I did not write or assist in writing his complaint nor was I ever given a copy to review or read. I do not have a copy of Mr. Teeboom's Complaint. See Teeboom Affidavit.
3. **Improper Ex Parte Communications and Lack of Impartiality (Rule 3.5(b)):**
 - o Chairman Bush, presiding over a complaint involving the City, engaged in ex parte communication with the City Legal Office (while Attorney Bolton and Attorney Leonard face a high-profile retaliatory arrest trial in Federal Court 1-22-cv-00326 LM) to **request and obtain all negative court orders concerning the Complainant.** This was done explicitly to use the information against the

¹ I took the violation alleged by Attorney Bush to the AG's office and the office refused to open an investigation on the matter. I addressed the matter in a July 31, 2025 hearing before Judge Schulman. He saw no violation issue.

² Judge Colburn struck part of the footnote after a citizen filed a JCC complaint against her for her inaccurate dicta footnote. I addressed this footnote in Court before Judge Temple; The judges never address this issue again with me nor ever accused me again. I consider the matter over until Bush pull it out and slammed me with it.

Complainant in the Teeboom hearing. This communication violates the sanctity of the quasi-judicial process and demonstrates flagrant bias.

4. **Inconsistent Framing and Prejudicial Rhetoric (Rule 8.4(d)):**

- Chairman Bush inconsistently framed the meeting as an **"initial screening"** yet administered an oath, accepted live testimony, and permitted cross-examination—actions typical of an evidentiary hearing. This confusing and inconsistent procedural framing prejudiced the parties.
- Chairman Bush used dismissive and biased language, referring to the complainants and their supporters as **"your little group"** and accusing them of being **"all upset."**
- None of the people in attendance had a copy of Mr. Teeboom's complaint and were not part of a "little group".

B. Continued Misconduct: December 4, 2025 ERC Meeting (Thibeault Complaint)

Witness: I am requesting the ADO call Attorney Robert Sullivan as a witness. Attorney Sullivan no longer works as the City of Portsmouth Senior Counsel. He has retired. Nashua, Bush and the City have refused to provide his email address to me. I have requested they forward my emails and communications to Attorney Sullivan, but I have no confirmation that they are doing so.

By way of background, I filed an ethics complaint against a seated Aldermen on September 14, 2025. It was scheduled for a October 16, 2025 hearing which was cancelled due to a lack of a quorum and other secondary reasons. It was rescheduled for December 4, 2025. I attended the meeting where Bush spoke about the need to cancel due to a lack of a quorum.

Exhibits:

- A. Meeting minutes of December 4, 2025
- B. December 5, 2025 email to Mayor Donchess, Board of Aldermen, Bush and Ethic Review Committee.
- C. December 10, 2025 email exchange with BOA, Mayor, Bush, ERC and Derek Thibeault
- D. December 11, 2025 email to Mayor, BOA, Bush, Perrin, ERC and Derek Thibeault.

Chairman Bush's conduct escalated, demonstrating an ongoing lack of impartiality and a failure to maintain the minimal integrity of the tribunal.

1. **Misconduct: Encouraging Litigation and Refusing Counsel (Rule 8.4(d)):**

- When Complainant sought procedural clarity, the Chairman improperly advised her to litigate: **"Well, you can file a lawsuit in Superior Court —"**
- Chairman Bush actively prevented the City's legal advisor, Attorney Sullivan, from speaking on crucial procedural matters, stating, **"Well, not in my presence." Bush cut off Counsel hired to assist the committee repeatedly.**

2. **Hostile and Threatening Conduct Exacerbated by Power Imbalance (Rules 8.4(d) and 3.5(d)):**

- Chairman Bush escalated the matter by threatening the Complainant, stating, **“You will see what a big boy I am,”** and followed this by stating, **“you have no class.”**
 - This threat is aggravated by Attorney Bush’s status as a high-ranking member of the state’s legal community, serving on the **Judicial Selection Committee** and the **Judicial Ethics Committee**. This institutional power imbalance suggests he is using his influence to intimidate a private citizen, constituting an abuse of power and conduct prejudicial to the administration of justice. Based on information and belief, Attorney Bush has a close relationship with Governor Ayotte. They grew up in Nashua with Eric Wilson and have been long term friends. Based on information and belief, Mr. Bush was roommates with Ayotte and Judge LaPlante in their early professional lives. Attorney Wilson lives on the same street in Nashua as Governor Ayotte. There are high level connections.
3. **Facilitating Unequal Access to Information (Rule 8.4(d)):**
- Chairman Bush refused to disclose the official basis for member recusals, despite multiple requests dating back to **November 4, 2025**. I have pointed out to Attorney Bush that this is a right of both parties to have this information.
 - The respondent, Alderman Thibeault, subsequently confirmed he was privy to this non-public information and had personally intervened to secure the recusal, creating an **unfair advantage** and violating due process which Attorney Bush knew about.
4. **Procedural Recklessness:** Chairman Bush failed to ensure conflicts were identified promptly (the second recusal occurred **"as recently as today,"** despite the complaint being filed in September), demonstrating negligence that prejudices the timely resolution of the complaint.

IV. RELIEF REQUESTED

Formal Investigation: Complainant requests the Attorney Discipline Office open a formal investigation and send this complaint to the Disciplinary Counsel for review into the professional conduct of Attorney Tim Bush regarding his actions during the May 15, 2025, and December 4, 2025, Ethics Review Committee meetings.

Addressing Conflict of Interest: The investigation should specifically address the ethical breach created by Attorney Bush's ex parte communication with the City Legal Office to obtain damaging records, particularly since the City attorneys involved have a documented reason to interfere (Federal Case). Attorney Bush's reliance on the City Legal Office for information, rather than the City’s independent advisor, Attorney Sullivan, demonstrates a profound lack of ethical judgment and a compromise of the judicial process.

Protecting Citizen Rights: The Attorney Discipline Office is urged to acknowledge the significant power imbalance created when an attorney holding high state-level appointments uses his official position in a hostile manner against a private citizen who has been publicly recognized for her advocacy of fundamental rights. The requested discipline must ensure that powerful, connected attorneys cannot use their status to undermine the basic rights of citizens.

/s/Laurie Ortolano
Laurie Ortolano

I, Laurie Ortolano, swear that the statements presented in this Compliant represent truthful and accurate account to the best of my ability.

/s/Laurie Ortolano
Laurie Ortolano