

New Hampshire Supreme Court

Attorney Discipline Office

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April 1, 2026

Ms. Laurie Ortolano
41 Berkeley Street
Nashua, NH 03064

Re: Grievance against Timothy E. Bush, Esquire

Dear Ms. Ortolano:

I have completed my review of your grievance dated and received by this Office on December 11, 2025, against Timothy E. Bush, Esquire. I have also reviewed the following:

- i. Mr. Bush's voluntary response to the grievance dated January 28, 2026;
- ii. the attachments to the grievance and voluntary response;
- iii. your Reply to Attorney Bush's response dated February 18, 2026;
- iv. the audio file of the City of Nashua Ethics Review Committee's (ERC) December 4, 2025 meeting;
- v. your emails dated January 13, 2026; January 14, 2026; January 16, 2026; and March 9, 2026, including any attachments to those emails.

The New Hampshire Supreme Court Attorney Discipline Office processes complaints against attorneys when there are allegations of professional misconduct. By "professional misconduct," we mean conduct that violates the Rules of Professional Conduct.

In any case in which it is ultimately found that a lawyer has violated the Rules of Professional Conduct, the Professional Conduct Committee imposes or recommends an appropriate sanction. Possible sanctions are reprimand, public censure, suspension, or disbarment. The Committee does not have the authority to award money, resolve fee disputes, or affect the underlying case.

I have analyzed your claims of professional misconduct against Mr. Bush and, after consideration of all the potential issues raised in your grievance, even if not specifically referenced herein, I have determined that there is no reasonable likelihood that a hearing panel would find clear and convincing evidence that Mr. Bush violated the Rules of Professional Conduct (the "Rules").

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Your grievance against Mr. Bush is based upon his conduct as ERC Chairman.

**Allegations concerning misconduct at May 15, 2025 ERC Meeting
on Teeboom Complaint**

You alleged in the grievance that Mr. Bush publicly read into the record an alleged portion of a footnote that had been stricken from a Hillsborough Southern District Superior Court Order in the matter of Denise Muccioli v. City of Nashua, Case No.: 2023-CV-00168 (the “Muccioli Action”). The footnote on Page 2 of the Order dated July 6, 2023 (the “Muccioli Order”), issued in the Muccioli Action, states the following:

The Court strongly suspects that Laurie Ortolano, a non-party to this action, is drafting the petitioner’s filings in this case, including the instant motion as well as the petition. (citation omitted) In fact, the Court observed Ms. Ortolano communicating with the petitioner during the hearing in this matter. The Court reminds Ms. Ortolano that she is not an attorney and it is generally unlawful for non-attorneys to engage in the practice of law, which includes drafting legal filings on behalf of others. See RSA 311:7; State v. Settle, 124 N.H. 832, 837 (1984) (interpreting RSA 311:7 to prohibit non-attorneys from preparing and filing documents in the court system on behalf of others).¹

The grievance alleges that Mr. Bush deliberately misused “Inaccurate Judicial Records” at the May 15, 2025 ERC Meeting; made an improper public accusation that you were assisting Mr. Teeboom and engaging in the unauthorized practice of law; that Mr. Bush had improper *ex parte* communication with the City of Nashua Legal Office to request and obtain negative Court orders regarding you; that he inconsistently framed the meeting as an “initial screening” when there was witness testimony typical of an evidentiary hearing; and used dismissive and biased language at the meeting, including referring to Mr. Teeboom’s supporters as a “little group” and accusing them of being “all upset”. You alleged this conduct violated the following Rules: Rule 8.4(c) and (d) (Misconduct) and Rule 3.5(b) and (d) (Impartiality and Decorum of the Tribunal).

Undersigned counsel read the transcript from the May 15, 2025 ERC Meeting, which was attached to the grievance. Starting at Page 37 of the transcript, Mr. Bush references the Muccioli Order:

Chairman Bush: I'm going to say one more thing before we get there, and I am going to take up one of your rule changes that you proposed. And then we can deal with that and then you can go back to questioning Attorney Bolton, but I want to do this before we take a break. I'm going to give each committee member, I don't know if you've seen this or one of your committee, one of your... Okay.

¹ Ms. Muccioli filed a Motion for Reconsideration and Clarification of the Record on July 13, 2023 in the Muccioli Action. This Motion was granted on August 17, 2023, only as to the request to correct the record that it was Ms. Colquhoun, not Ms. Ortolano, that communicated with Ms. Muccioli at the hearing.

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Vice Chairman Tencza: Thank you.

Chairman Bush: So, one of the things that I will take up, which I know makes you happy is... Oh, I do have this. This is a decision... And I'll remind everyone in this room, because you've asked that you wanted a non-person representative, or non-attorney representative, right?

Fred Teeboom: No, advisory.

Chairman Bush: Non-attorney advisory committee. Okay.

Fred Teeboom: It's a non-attorney.

Chairman Bush: That you, and who is that non-advisory person you want to have on?

Fred Teeboom: The non-attorney advisory is Laurie Ortolano.

Chairman Bush: Okay.

Fred Teeboom: Who brought a complaint before this committee before.

Chairman Bush: She's brought complaints before, correct. So, I'm going to suggest to you, and to Ms. Ortolano... I'm reading from Muccioli versus City of Nashua in the footnote. This isn't from me, this isn't from an unethical board or whatever. This is from Jackie Coburn. Maybe people don't... Judge Jackie Coburn. Who says, number one footnote.

"The court strongly suspects that Laurie Ortolano a non-party to this action is drafting the petitioners," in this case Denise Muccioli, "filings in this case, including the instant motion as well as the petition. In fact, the court observed Mrs. Ortolano communicating with the petitioner during the hearing in this matter." And for the record, I think it's pretty clear that the 12 people or 14 people in this room, but that's exactly what's been going on here, to a limited degree. Although Mr. Teeboom, frankly you can take care of yourself when you're asking questions. You don't need any help, but whatever.

"The court reminds. Mrs. Ortolano," this is Jackie Coburn, "that she is not an attorney and it is generally unlawful for non-attorneys to engage in the practice of law, which includes drafting legal filings on behalf of others. See RSA3117. State v Stuttle 124 New Hampshire 832 837, interpreting RSA311:7 to prohibit non-attorneys from preparing and filing documents in the court system on behalf of others."

So, I'm going to tell you right now that there's, you know... You guys can, I'm not going to say you can do what you want in the five-minute break you have, but in terms of like my

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vote, I'm only just one. And that's why I didn't answer your questions, because I'm the chairperson. Any rule changes, which I don't believe we can make, but I'm one of five, one of them that I want to be... You cannot have non-attorneys advising and I'm gently saying that it's a violation of RSA311:7. With that having been said, you want five minutes, we'll give you a, we'll give you 10. How does that sound? You want to stay here or you want to go somewhere else?

ERC May 15, 2025 Meeting transcript, pp. 37-38.

In his voluntary response, Mr. Bush stated that prior to the May 15, 2025 ERC Meeting, Mr. Teeboom sent a number of emails requesting clarification of some of the same procedural issues that you had previously criticized the ERC for. These included the use of subpoena power. Mr. Bush stated this led him to believe that you may have been advising Mr. Teeboom.

Mr. Bush stated that prior to the ERC meeting Mr. Teeboom also sent an email requesting a non-lawyer represent him at the meeting. Mr. Bush then "reviewed an order where Judge Colburn had expressly warned [you] that [you] could not represent a pro se litigants (sic) at a hearing..." Mr. Bush stated that he requested a copy of the Muccioli Order from the City to remind you that you could not represent Mr. Teeboom. During the hearing on May 15, 2025, Mr. Bush believed that you were assisting Mr. Teeboom, therefore he reminded you of the Court's previous admonition.² He stated, "The purpose of submitting the order was not to 'embarrass' her but to show she could not represent Mr. Teeboom and she should know she cannot represent him because of Judge Colburn's order..."

You alleged that Mr. Bush's statements at the May 15, 2025 meeting violated Rule 8.4(c), 8.4 (d), 3.5(b) and 3.5(d). Rule 8.4(d) states that it is professional misconduct for a lawyer to "engage in conduct involving dishonesty, fraud, deceit or misrepresentation." Rule 8.4 (d) states that it is professional misconduct to "state or imply an ability to influence improperly a government agency or official". Rule 3.5(b) states that a lawyer shall not "communicate ex parte with such a person [judge, juror, prospective juror or other official by means prohibited by law] during the proceeding unless authorized to do so by law or court order; and Rule 3.5(d) states that a lawyer shall not "engage in conduct intended to disrupt a tribunal."

There is no evidence that Mr. Bush knew, at the time that his statements were made at the meeting on May 15, 2025, that the Court Order in the Muccioli Action had been modified to correct who was communicating with Ms. Muccioli during the hearing. There is also no evidence the statements were made to improperly influence a government agency or official. Mr. Bush utilized the Court Order in the Muccoli Action to warn you, based on his understanding of Judge Colburn's order, that as a non-lawyer, you could not represent Mr. Teeboom. I have reviewed the other allegations made regarding Mr. Bush's conduct at the May

² Mr. Bush indicates that you later produced a pleading that indicated that the Court had accepted your representation that you had not assisted Ms. Muccioli at the hearing, that someone else was assisting her. He stated he was unaware of that subsequent ruling at the May 15, 2025 meeting.

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15, 2025 ERC meeting (i.e., referring to the meeting as a screening meeting and not an evidentiary meeting, and referring to others present at the meeting as Mr. Teeboom's "little group", etc.) and do not find the allegations to constitute a violation of the Rules. Accordingly, there is no reasonable likelihood that a hearing panel would find clear and convincing evidence that Mr. Bush violated the Rules at the May 15, 2025 ERC meeting.

Allegations concerning "continued" misconduct at the December 4, 2025 ERC meeting

Next, you alleged that Mr. Bush's conduct at the December 4, 2025 ERC meeting violated the Rules. This meeting concerned a complaint you filed against Nashua Alderman Derek Thibeault. The alleged professional misconduct by Mr. Bush included encouraging litigation when he stated, "Well, you can file a lawsuit in Superior Court"; refusing counsel by the ERC's legal advisor; making statements such as "You will see what a big boy I am," followed by "you have no class"; and facilitating unequal access to information. You alleged this conduct violated Rules 8.4(d) (Conduct Prejudicial to the Administration of Justice)³ and 3.5(d)(Impartiality and Decorum of the Tribunal).

In your supplemental submission, you alleged that Mr. Bush's statements regarding member unavailability for the meeting lacked candor and were material misrepresentations violating Rules 8.4(c) and 8.4(d). You stated that following the meeting you filed multiple Right-to-Know requests to obtain the records to understand who had recused themselves and the timing and circumstances of ERC members' unavailability. The records you obtained stated that ERC member Lyndsay Robinson notified Mr. Bush by email dated December 2, 2025, that she did not believe she would be able to attend the meeting.

In Mr. Bush's voluntary response, he explained that the ERC has five standing members and one alternate. The alternate member resigned well in advance of the December 4, 2025 meeting. Another member had recused themselves from the matter. Therefore, the ERC was down to four members. Mr. Bush stated that on or about December 2, 2025, the ERC members received notification from another member who was unable to attend the December 4th meeting due to a death in the family. Mr. Bush says he was then notified on December 2 or December 3 from the ERC administrator that Alderman Thibeault believed one of the ERC members may have a conflict of interest. On December 4, 2025, Mr. Bush met with legal counsel at 6pm in advance of the ERC meeting. At that time, the member decided they had the appearance of a conflict of interest, which precluded them from hearing the matter. This decision was made at approximately 6:25 p.m., on December 4, 2025.

Thereafter, ERC Attorney Bob Sullivan, ERC member Mike Tabasco, and Mr. Bush went to City Hall to explain to you that they did not have a quorum to hear the matter. Mr. Bush

³ The New Hampshire Supreme Court has not adopted Model Rule of Professional Conduct Rule 8.4(d) (Conduct Prejudicial to the Administration of Justice) which prohibits lawyers from engaging in conduct that is prejudicial to the administration of justice. Therefore, I have not analyzed and refrain from determining whether the alleged conduct constitutes a violation of Model Rule 8.4(d).

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represented that, "Mrs. Ortolano wanted to know which member had a conflict and which member had a death in the family. I did not want to indicate who had a death in the family out of respect for the privacy of that member...Mrs. Ortolano did not have any less access to the decision making of the committee than the other party in her complaint, Mr. Thibault." Mr. Bush further indicated that you raised RSA 91-A as a recourse to get the information you were seeking regarding why there was no quorum on that date and that "it is somewhat of an irony in the suggestion that I am encouraging her to file litigation...."

A review of the ERC meeting minutes of December 4, 2025, reflect that Mr. Bush informed everyone at the start of the meeting that, because of recusals and a personal issue (i.e., the death in the family of one of the ERC's members), the meeting would not go forward. Thereafter, you requested more information on who recused themselves from the matter and why the other member of the ERC was unavailable on that date. You further indicated that if it was an Aldermanic meeting, that information would be given at the meeting and not at some future date. Mr. Bush then suggested you can file a lawsuit in Superior Court, and you stated, "You know what, go screw yourself, Mr. Bush. Go screw yourself." Mr. Bush refused to further explain the recusals and answer your questions. The meeting ended with the following exchange:

ORTOLANO: Toughen up, get a spine and get a thick skin, you're a big boy.

BUSH: You will see what a big boy I am.

ORTOLANO: Yeah, I will.

BUSH: All right, that's enough.

SULLIVAN: I am happy to talk to you for a few minutes.

The allegations do not constitute a violation of the Rules. Mr. Bush's conduct as ERC Chairperson at the December 4, 2025 meeting was not "conduct involving dishonesty, fraud, deceit or misrepresentation" or "conduct intended to disrupt a tribunal", but appears to be a dispute between you and him as to what information he was legally obligated to provide to you at the time of the meeting due to a lack of quorum to go forward. Furthermore, I have concluded that his statement that "someone died today" (when the ERC member's family member died two days earlier) was not, in any way, a material misrepresentation. The unavailability of the ERC member was the material issue, not the specific reason for the unavailability or the date on which his or her family member died. Based on all the foregoing, I have determined that there is no reasonable likelihood that a hearing panel would find clear and convincing evidence that Mr. Bush's conduct at issue violated Rule 8.4(c), Rule 3.5 (d), or any other Rule of Professional Conduct.

Based on all the foregoing, I am not docketing your grievance against Mr. Bush as a complaint, and it will not be investigated further.

Requests for reconsideration of this decision must be clearly labeled as such and must be filed with this Office within 10 days of the date of this letter. "The request shall state, with particular clarity, points of law or fact that have been overlooked or misapprehended and shall

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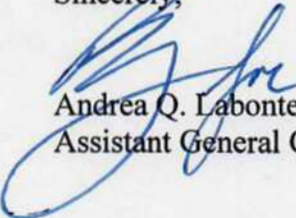
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contain such argument in support of the request” as you desire to present. See New Hampshire Supreme Court Rule 37A(VI)(a).

In accordance with New Hampshire Supreme Court Rule 37A(II)(a)(4)(B), Mr. Bush is this date being sent a copy of this letter. He is being advised that he may submit a further reply to your grievance letter within 30 days from the date of this letter. At that time, your grievance and his reply(ies) shall be available for public inspection at this Office for a period of two years from the date the grievance was received by this Office (December 11, 2025). At the conclusion of this two-year period, the file will be destroyed.

Please further note that the Attorney Discipline System’s standing orders and policies are available to review at www.nhattyreg.org.

Sincerely,



Andrea Q. Labonte
Assistant General Counsel

AQL/jt

cc: Timothy E. Bush, Esquire

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April 1, 2026

Timothy E. Bush, Esquire
Wilson, Bush & Keefe, PC
378 Main Street
Nashua, NH 03060

Re: Grievance filed by Ms. Laurie Ortolano

Dear Mr. Bush:

You provided a voluntary response dated January 28, 2026, to a grievance letter filed by Ms. Laurie Ortolano. Enclosed is a copy of my letter to Ms. Ortolano of this date in which I explain that we are not docketing this matter as a complaint for the reasons stated in my letter.

In accordance with New Hampshire Supreme Court Rule 37A(II)(a)(4)(B), you are hereby notified that you may submit a further reply to the grievance within 30 days of the date of this letter. At that time, the grievance and your reply(ies) shall be available for public inspection at this Office for a period of two years from the date on which the grievance was first received by this Office (December 11, 2025). At the conclusion of this two-year period, the file will be destroyed. Please further note that the Attorney Discipline System's standing orders and policies are available to review at www.nhattyreg.org.

Sincerely,



Andrea Q. Labonte
Assistant General Counsel

AQL/jt

cc: Ms. Laurie Ortolano