

COMPLAINT AGAINST ATTORNEY TIMOTHY BUSH

New Hampshire Attorney Discipline Office

Complainant: Laurie Ortolano, 41 Berkeley St., Nashua, NH 03064

Respondent: Attorney Timothy Bush, Chair, Nashua Ethics Review Committee (ERC);
bush@wbdklaw.com

Date: May 6, 2026

I. INTRODUCTION AND RULE VIOLATIONS ALLEGED

This complaint alleges that Attorney Timothy Bush, in his capacity as Chairman of the Nashua Ethics Review Committee (ERC), has engaged in professional misconduct by:

1. Applying the ERC's procedural requirements in a materially discriminatory manner based on the sex of the complainants, in violation of **NH Rule of Professional Conduct 8.4(g)** (adopted July 2019), which provides that it is professional misconduct for a lawyer to take any action, while acting as a lawyer in any context, if the lawyer knows or it is obvious that the action has the primary purpose to embarrass, harass or burden another person, including conduct motivated by animus against that person based upon that person's sex.
2. Engaging in conduct prejudicial to the administration of justice in violation of **NH Rule of Professional Conduct 8.4(d)**, by failing to apply the ERC's statutory 30-day hearing requirement uniformly, to the material detriment of female complainants.
3. Using gendered, demeaning language to characterize the advocacy of female complainants while applying neutral, professional language to describe identical advocacy by a male complainant, in further violation of **Rule 8.4(g)** and **Rule 8.4(c)** (conduct involving misrepresentation).

II. THE STATUTORY FRAMEWORK: NRO ARTICLE IX, SECTION 12-33

Nashua Revised Ordinance (NRO) Article IX, Section 12-33 governs the ERC complaint process. It requires that a hearing be held within 30 days of the ERC's receipt of a complaint. This is a mandatory statutory window, not a guideline. Attorney Bush, as ERC Chairman, bears direct responsibility for ensuring compliance with this requirement as to all complainants, without regard to the sex, identity, or prior litigation history of those complainants.

III. THE PROCEDURAL TIMELINE — EVIDENCE OF DISCRIMINATORY TREATMENT

The following timeline demonstrates a pattern of materially inconsistent application of Section 12-33's hearing requirement, consistently to the detriment of female complainants. Blue rows represent male complainants; red rows represent female complainants.

Complainant(s)	Sex	Complaint Filed	Screening/Hearing Held	Days	Notes
Tom Prieto	Male	April 11, 2017 (McKay)	May 17, 2017	~35 days	Within window ✓
Tom Prieto (Mayor)	Male	May 26, 2017 (Donchess)	Addressed contemporaneously	~Within window	✓
Fred Teeboom	Male	~April 25, 2025	May 15, 2025	~14 days	Within window ✓
Ortolano & Colquhoun (Mayor, 2023)	Female	April 12, 2023	May 24, 2023 (screening)	~42 days	Dismissed at screening
Ortolano (Attys Bolton & Leonard)	Female	June 15–16, 2023	October 26, 2023	~130 days	No direct notice given
Colquhoun & Ortolano (Mayor, 2024)	Female	Dec. 23, 2024	Screening: Jan. 30, 2025; Hearing: Mar. 13, 2025	~80 days to hearing	
Ortolano (Current Complaint)	Female	Sept. 14, 2025	NONE as of March 1, 2026	215+ days	NO HEARING — Deadline expired

The pattern is unmistakable: every male complainant received a screening meeting or hearing within or close to the 30-day statutory window. Every female complainant experienced delays ranging from 42 to over 215 days, with the most recent complaint receiving no hearing whatsoever despite the 30-day mandate having elapsed more than seven times over.

Notably, Fred Teeboom, a male complainant with an extensively documented adversarial history with both the City of Nashua and with respondent's co-counsel (Attorney Bolton physically confronted Mr. Teeboom in the aldermanic chamber in 2000, resulting in a police incident report), received a combined screening and hearing within approximately 14 daysfast, er than

any other complainant in the documented record, and faster than any female complainant has ever received even a screening meeting alone. If a complainant with documented antagonism toward the City's legal team can receive expedited process, there is no neutral procedural justification for the repeated, systemic delay experienced by female complainants.

No continuance for good cause has been issued with respect to the current pending Ortolano complaint. No hearing has been scheduled. No explanation has been provided. The 30-day statutory deadline of October 14, 2025 has long since passed.

Chairman Bush and the City have compounded the procedural violations described above by conducting proceedings in non-public session and sealing records in a manner inconsistent with New Hampshire's Right-to-Know Law. The City has further failed to post ERC meetings and hearings on its official website as required under RSA 91-A, which mandates proper public notice and posting of governmental proceedings. The absence of such postings is not merely an administrative oversight; it has the effect of shielding the ERC's selective scheduling practices from public scrutiny.

The dates provided for the 2017 Prieto complaints were furnished by Mrs. Prieto, who maintains meticulous personal records. The 2017 complaint materials cannot be located on the City's website, consistent with the broader pattern of inadequate public notice. To address this evidentiary gap, Complainant has submitted a Right-to-Know request to the City's legal department seeking all ERC complaints filed and noticed since 2017. A response remains outstanding. Given the City's demonstrated history of delay in responding to Right-to-Know requests, Complainant anticipates that production will not be forthcoming without further legal process.

Attorney Bush, as ERC Chairman, has access to the complete docket of complaints and hearing records and is therefore in a position to confirm or correct the dates set forth in the timeline table above. The ERC meetings that have been noticed on the City's website, an incomplete record, can be found at the following link:

<https://www.nashuanh.gov/AgendaCenter>

<https://nashuanh.portal.civicclerk.com>

The City switched to a new Portal meeting notice and minutes software system in early 2025. Meetings prior to this date can be located in the Agenda Center.

IV. GENDERED LANGUAGE IN BUSH'S WRITTEN FILINGS — EVIDENCE OF ANIMUS

In the Response to Complaint filed by Attorney Bush in the above-referenced ERC matter, Attorney Bush characterized the communications of the female complainants and a male

complainant regarding the identical subject matter, the ERC's subpoena power, using strikingly different language:

Describing Complainant Ortolano (female):

*"Mrs. Ortolano also repeatedly implored the ERC to allow subpoena power."
(Response to Complaint, p. 1)*

Describing Fred Teeboom (male):

*"Mr. Teeboom wanted to know the status of subpoena power." (Response to
Complaint, p. 1)*

The attached Exhibit 2 to Bush's own Response confirms that Complainant's actual communication was a formal written request to change the ERC's procedural rules to permit subpoenas, substantively the same request Teeboom made in his emails (Exhibit 1). Both complainants were asking the ERC to adopt subpoena authority.

The word "**implored**" carries a connotation of emotional pleading, supplication, and desperation. It characterizes the female complainant as uncontrolled and emotionally driven. In contrast, "**wanted to know**" characterizes the male complainant as rational, curious, and procedurally engaged. Attorney Bush made this linguistic choice in a formal legal filing, acting in his capacity as an attorney and ERC Chairman. This is not an inadvertent word choice; it reflects the manner in which Attorney Bush perceives and portrays female advocates before his tribunal differently from male advocates raising identical issues.

This use of disparaging, diminishing language directed at a female party before a tribunal he controls, while neutrally characterizing a male party raising the same substantive point, constitutes evidence of sex-based animus under Rule 8.4(g).

V. RULE 8.4(g) — ANALYSIS

New Hampshire Rule of Professional Conduct 8.4(g) (effective July 2019) provides:

It is professional misconduct for a lawyer to take any action, while acting as a lawyer in any context, if the lawyer knows or it is obvious that the action has the primary purpose to embarrass, harass or burden another person, including conduct motivated by animus against the other person based upon the other person's sex.

Attorney Bush at all relevant times was acting as a lawyer, specifically as legal chairman of a quasi-judicial municipal body conducting formal ethics proceedings under NRO Article IX. His actions in that capacity are squarely within the rule.

The evidence presented establishes that female complainants have been systematically burdened, through delay, failure to provide notice, and outright refusal to schedule hearings, in a manner not applied to male complainants. The use of demeaning language in formal filings further supports that this burden was imposed with awareness of, and at least in part due to, the complainants' sex.

VI. RULE 8.4(d) — CONDUCT PREJUDICIAL TO THE ADMINISTRATION OF JUSTICE

Rule 8.4(d) prohibits conduct that is prejudicial to the administration of justice. A municipal tribunal exercising adjudicatory authority over ethics complaints must apply its procedural rules uniformly. The 30-day hearing mandate of NRO Section 12-33 exists to protect all complainants' rights to timely resolution, without regard to the identity or sex of the complainant. Attorney Bush's pattern of timely compliance with that mandate for male complainants and systematic non-compliance for female complainants, including the complete failure to hold any hearing on the current Ortolano complaint for over 215 days, constitutes conduct materially prejudicial to the fair administration of justice.

VII. RELIEF REQUESTED

Complainant respectfully requests that the Attorney Discipline Office:

- 1. Open a formal investigation into the above allegations against Attorney Timothy Bush;
- 2. Examine the complete docket of ERC complaints filed during Attorney Bush's tenure as Chairman and compile the filing dates, screening dates, and hearing dates for all complainants, disaggregated by sex;
- 3. Consider whether Attorney Bush's continued service as ERC Chairman during any investigation is appropriate given the pending, unheard complaint;
- 4. Take such disciplinary action as the evidence warrants under Rules 8.4(g) and 8.4(d).

Respectfully submitted,

/s/Laurie Ortolano

Laurie Ortolano
41 Berkeley St., Nashua, NH 03064

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

RESPONSE TO COMPLAINT

I. INTRODUCTION:

Based on the parenthetical synopsis applied by the complainant, it appears that she accused the respondent of violating 8.4 (c) by “Knowingly using inaccurate court records in a public forum.” She also cites Rule 3.5 (b) (for seeking negative records from city Counsel for use against a private citizen). These complaints appear to arise out of a May 15, 2025, City of Nashua Ethics Review Committee (ERC) meeting. The complainant also cites 8.4 (d) (for abuse of process, encouraging litigation, and facilitating unequal access to information), as well as 3.5 (d) (for hostile and threatening language). These two allegations appear to rise out of a December 4, 2025, ERC hearing. The respondent will address each in turn.

II. PROCEDURAL HISTORY: May 15, 2025 (claim)

Fred Teeboom, a Nashua Resident, filed a complaint against a city official prior to May 15, 2025. Mr. Teeboom sent a number of emails to the respondent and others seeking clarification of some of the same procedural issues that Mrs. Ortolano had criticized the committee for. For example, Mr. Teeboom wanted to know the status of subpoena power (see Exhibit 1, Paragraph 3) which had been an issue that the complainant had raised. Mrs. Ortolano also repeatedly implored the ERC to allow subpoena power. (see Exhibit 2 and 2b) This led me to believe that Laurie Ortolano may have been advising Mr. Teeboom.

In her complaint to the ADO, Mrs. Ortolano indicates that she did not write or assist in writing Mr. Teeboom’s complaint. However, he sent an email (See attached as Exhibit 3), requesting that he have a non-lawyer represent him at the meeting. I reviewed an order where Judge Colburn had expressly warned Mrs. Ortolano that she could not represent a pro

se litigants at a hearing (see attached as Exhibit 4). Judge Colburn also strongly suggests that Mrs. Ortolano had prepared the pro se litigant's pleadings. I was similarly concerned that Mrs. Ortolano was assisting Mr. Teeboom in drafting his emails. I requested a copy of Judge Colburn's order from the city so I could remind Mrs. Ortolano at the May 15, 2025, hearing that she could not represent Mr. Teeboom. Mr. Teeboom had further clarified what he wanted, "a non-attorney co-counsel to assist him," (see Exhibit 5). I strongly believed that this person was Laurie Ortolano. This belief was proven accurate.

During the hearing on May 15, 2025, Mrs. Ortolano was assisting Mr. Teeboom at the hearing so I reminded her of Judge Colburn's admonition.¹ However, Mrs. Ortolano misses the main point. The purpose of submitting the order was not to "embarrass" her but to show she could not represent Mr. Teeboom and that she should know she cannot represent him because of Judge Colburn's order, which Mrs. Ortolano clearly knew about.

My conduct in seeking a copy of Judge Colburn's opinion did not violate any of the rules of professional conduct. As chairman of the committee, I wanted to make sure that Mrs. Ortolano and Mr. Teeboom were aware that Mrs. Ortolano could not represent Mr. Teeboom and I had statutory authority and Judge Colburn's order advising Mrs. Ortolano of same.

III. PROCEDURAL HISTORY: December 4, 2025 (claim)

The other claims Rule 8.4 (d) Misconduct – conduct prejudicial to the Administration of Justice (For abuse of process, encouraging litigation and facilitating unequal access to

¹ Ms. Ortolano later produced a pleading that indicated that Judge Colburn had accepted Ms. Ortolano's representation that she had not been advising Mrs. Muccioli at the hearing, but that someone else had been advising Mrs. Muccioli. I was not aware of that subsequent ruling on May 15, 2025. Regardless the main point, as stated above, is that Mrs. Ortolano had been informed that she could not provide legal advice as a non-lawyer.

information) and 3.5 (a) Impartiality and Decorum of Tribunal (for hostile and threatening language) arise out of a December 4, 2025 hearing.

Mrs. Ortolano filed a complaint with the ERC against a sitting alderman, Derek Thibault. I do not know Derek Thibault. I have not had any prior conversations with Derek Thibault. The ERC has five (5) standing members and an alternate. The alternate member resigned from the Committee well in advance of December 4, 2025. Another member recused themselves from the matter. We were thus down to four (4) members.

On or about December 2, 2025, ERC members received notification from another member that they would be unable to attend because of a death in the family. We were now down to three (3) members. I was also informed by Gary Perrin, Administrator for the ERC, on either December 2nd or December 3rd, that Alderman Thibault informed a city official that one of the ERC members may have a conflict of interest. This member of the committee had either placed a sign on their lawn supporting Alderman Thibault or contributed to the alderman or perhaps both.

I scheduled a legal meeting with counsel, Bob Sullivan at 6 pm on December 4, 2025, to discuss the conflict. The member decided at that time they had the appearance of a conflict which precluded them from hearing the matter. This decision was made at approximately 6:25 p.m., on December 4, 2025.

Attorney Bob Sullivan, ERC member Mike Tabasco, and I went to city hall to explain to Mrs. Ortolano that we did not have a quorum. 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. I do not

believe that I indicated that the person had died that day. It is not imperative whether they died that day or two days before, the key is that the member was unavailable.

Mrs. Ortolano did not have any less access to the decision making of the committee than the other party in her complaint, Derek Thibault. Mr. Thibault did bring the potential issue of a conflict to city officials who appropriately brought it to my attention. I brought the issue of a potential conflict to the attention of counsel for the committee and to the individual themselves. I believe the member made the appropriate decision to recuse themselves. This conduct does not violate the Rules of Professional Conduct.

Mrs. Ortolano is less than forthcoming regarding her own conduct at the hearing. At the hearing, Mrs. Ortolano mentions RSA 91- A as a recourse to get the information she deserves. Given Mrs. Ortolano's extensive litigation history, it is somewhat of an irony in the suggestion that I am encouraging her to file litigation. There were no threats made to Mrs. Ortolano, during the ERC process. Mrs. Ortolano will hear from me, by way of an order as chairman of the ERC, just as she heard from Judge Temple, (see Exhibit 6) at the appropriate legal time and in the appropriate legal setting. My conduct at the December 4, 2025, hearing did not violate the Rules of Professional Conduct.

CONCLUSION

I did not violate any of the Rules of Professional Conduct on either May 15, 2025 or December 4, 2025.

Exhibit 1

From: Fred Teeboom <fredtee@comcast.net>
Sent: Monday, May 05, 2025 5:41 PM
To: 'Tim Bush'
Cc: 'Deputy City Attorney Dory Clarke'; 'Robert P. Sullivan'; 'Perrin, Gary'
Subject: Questions on the Hearing on my Conduct Violations Complaint against BoA President Lori Wilshire

Atty. Bush:

1. Exactly what is the purpose of the 'initial hearing.' I read from NRO 12-33 that there is only one hearing, and that is to be held within 30 days of the ERC's receipt of the Complaint, not 30 days from some later date.
2. What does "if your complaint is screened-in" mean? There is no "initial screening review" in NRO par 12-33.
3. About Subpoena Power, the committee can adopt that as a rule under NRO 12-31. How can you hold a hearing if no witnesses are compelled to appear, other than the defendant (whose appearance is also optional)? For example, I may want to question city atty. Bolton, since he seems to have a lot to do with the circumstances leading to the Complaint against Wilshire (Read the Feb 25 minutes attached to my Complaint).
4. Furthermore, I expect
5. Gary Perrin is a R-t-K coordinator, not a member of the ERC. I thought the rules in NRO 12-31 would be the rules followed, unless the ERC committee adapted substitute of additional rules such as: rules for Subpoenas, for Interrogatories, for brief (e.g. 3 to 5 minutes) Oral Opening and Oral Closing Statements, for pre-Hearing and post - Hearing "Memoranda of Facts."
6. Who is Robert Sullivan? The ERC 's attorney, driving in pro-bono from Portsmouth, NH? How many attorneys do you need for the ERC's NRO 12-34 "advisory" function?

Fred Teeboom
Plaintiff
Former Alderman-at-Large

From: Tim Bush [mailto:bush@wbdklaw.com]
Sent: Monday, May 5, 2025 1:57 PM
To: 'Fred Teeboom'

Exhibit 2

Attorney Bush,

Perhaps at the November 30 meeting, your Board can change the rules to permit subpoenas to be served by the Complaints. Your Board has the power to implement this change and vote to amend the rules. Consider bringing due process into the Ethics Committee Complaint process, rewrite confidentiality rules and establish a tribunal that is not a kangaroo court.

Sincerely,

Laurie Ortolano

On Thu, Nov 23, 2023 at 7:42 PM Laurie Ortolano <laurieortolano@gmail.com> wrote:

Attorney Bush,

I will resubmit my complaints when my schedule permits. I will first be filing the PCC complaints against the three attorneys and then I will work on submitting the complaint. There are several others I am looking to bring to the committee as well. So, I will attend your November 30 meeting but my complaint won't be submitted by then.

Please inform me who to deliver the complaint to since the City is not handling these complaints.

Sincerely,

Laurie Ortolano

On Wed, Nov 22, 2023 at 12:51 PM Laurie Ortolano <laurieortolano@gmail.com> wrote:

Attorney Bush,

It is astonishing and beyond unprofessional that I learned on Nov 22, 2023 that my June 2023 complaint was not accepted because I forgot to notarize it. In July, I informed you that I wanted to move forward on the complaints, you simply ignored my request.

Exhibit 2b

Ethics Complaint - Mayor James Donchess
for authorizing payment of legal fees for a personal matter of an Aldermen

F. Pursue a course of conduct which will raise suspicion among the public that he is likely to be engaged in acts that are in violation of his trust.

Mayor Donchess should not have authorized the use of taxpayer funds to cover the personal legal expenses of someone being sued in their personal capacity, as this is not protected under the immunity statute. His actions undermine public trust and transparency. Furthermore, the Mayor did not discuss this unique legal issue with the Board of Aldermen.

We are requesting the Ethics Committee grant subpoena power to call witnesses.

The Complainants object to the sealing of the complaint, per NRO 12-23 (B) (C). These complaints, similar to a Petition, should be open records for public inspection. The complaint is not subject to confidentiality.

Very truly yours,

/s/Laura Colquhoun
Laura Colquhoun
30 Greenwood Dr.
Nashua, NH 03060

/s/Laurie Ortolano
Laurie Ortolano
41 Berkeley St.
Nashua, NH 03064

Exhibit 3

bush@wbdklaw.com

From: Fred Teeboom <fredtee@comcast.net>
Sent: Tuesday, May 06, 2025 2:44 PM
To: 'Robert P. Sullivan'; 'Tim Bush'
Subject: Questions on the Hearing on my Conduct Violations Complaint against BoA President Lori Wilshire

Atty. Bush and/or Atty. Sullivan:

Of six active members on the ERC listed on the Nashua website, at least three are currently licensed attorneys (Bush, Tencza and Robinson). Furthermore, I expect Nashua city atty. Bolton to provide counsel to Wilshire.

With yourself serving as "special counsel" to the ERC driving in from Portsmouth, NH (I understand you serve "pro-bono" but expect you're reimbursed for mileage), I may be facing five (5) attorneys.

Am I entitled to bring my own "special counsel" who happens **not** to be an attorney-at-law?

Thanks,

Fred Teeboom

From: Robert P. Sullivan [mailto:rpsulliv@portsmouthnh.gov]
Sent: Tuesday, May 6, 2025 12:30 PM
To: Fred Teeboom; 'Tim Bush'
Cc: 'Deputy City Attorney Dory Clarke'; 'Perrin, Gary'
Subject: RE: Typo corrections: Questions on the Hearing on my Conduct Violations Complaint against BoA President Lori Wilshire

Mr Teeboom,

I note that by email you have asked Attorney Bush, Chair of the Nashua Ethics Review Committee, "Who is Robert Sullivan?". Please be advised that I am a retired City Attorney from Portsmouth who currently works part time for that City. By longstanding prior arrangement between the City Attorney of the City of Portsmouth and the Corporation Counsel of the City of Nashua I have been advising the ERC as a special counsel. As such it is my expectation that I will be advising the ERC with respect to your complaint against President of the Board of Alderman, Lori Wilshire.

RPS

Robert P. Sullivan, Of Counsel
City of Portsmouth
1 Junkins Avenue
Portsmouth, NH 03801

(603) 610-7204 (Direct Dial)
(603) 427-1577 (Fax)

rpsullivan@cityofportsmouth.com

City Hall Hours: Monday, 8:00 a.m. - 6:00 p.m.; Tuesday - Thursday, 8:00 a.m. - 4:30 p.m. and Friday, 8:00 a.m. - 1:00 p.m. (NOTE: If a holiday falls on a Monday, City Hall will be open until 6:00 p.m. on Tuesday).

From: Fred Teeboom <fredtee@comcast.net>

Sent: Monday, May 5, 2025 5:57 PM

To: 'Tim Bush' <bush@wbdklaw.com>

Cc: 'Deputy City Attorney Dory Clarke' <clarked@nashuanh.org>; Robert P. Sullivan <rpsulliv@portsmouthnh.gov>; 'Perrin, Gary' <perring@nashuanh.gov>

Subject: Questions on the Hearing on my Conduct Violations Complaint against BoA President Lori Wilshire

Atty. Bush:

1. Exactly what is the purpose of the 'initial hearing.' I read from NRO 12-33 that there is only one hearing, and that is to be held within 30 days of the ERC's receipt of the Complaint, not 30 days from some later date.
2. What does "if your complaint is screened-in" mean? There is no "initial screening review" in NRO par 12-33.
3. About Subpoena Power, the committee can adopt that as a rule under NRO 12-31. How can you hold a hearing if no witnesses are compelled to appear, other than the defendant (whose appearance is not a requirement under NRO 12-31 (10)? For example, I may want to question city atty. Bolton, since he seems to have a lot to do with the circumstances leading to the Complaint against Wilshire (Read the Feb 25 minutes attached to my Complaint).
4. Gary Perrin is a R-t-K coordinator, not a member of the ERC. I thought the rules in NRO 12-31 would be the rules followed, unless the ERC committee adapted substitute or additional rules such as: rules for Subpoenas, for Interrogatories, for brief (e.g. 3 to 5 minutes) Oral Opening and Oral Closing Statements, for pre-Hearing and post - Hearing "Memoranda of Facts."
5. Who is Robert Sullivan? The ERC's attorney, driving in pro-bono from Portsmouth, NH? How many attorneys do you need for the ERC's NRO 12-34 "advisory" function?

Fred Teeboom

Plaintiff

Former Alderman-at-Large

From: Tim Bush [mailto:bush@wbdklaw.com]
Sent: Monday, May 5, 2025 1:57 PM
To: 'Fred Teeboom'
Cc: 'Deputy City Attorney Dory Clarke'; 'Robert P. Sullivan'; 'Perrin, Gary'
Subject: RE: Hearing on my Conduct Violations Complaint against BoA President Lori Wilshire

Hi Mr. Teeboom,
It looks like your initial screening will occur on May 15th. Exact time and location are not yet known as it appears City Hall rooms are otherwise occupied.

Gary Perrin is on this e mail and he will notify you of the details once it is ironed out.

The Committee has no subpoena power. This is not an issue for you at the initial hearing. Sometimes the Committee will have questions for the complainant at the initial hearing and sometimes there will be no questions.

If your complaint is "screened in" then Alderman Wilshire will be notified to appear at a further hearing. This hearing is also usually within 30 days after May 15th.

If you would like the specific rules under which the Committee operates I am sure either Gary or me will send them to you.

Tim

From: Fred Teeboom <fredtee@comcast.net>
Sent: Monday, May 05, 2025 1:07 PM
To: bush@wbdklaw.com
Cc: Deputy City Attorney Dory Clarke <clarked@nashuanh.org>
Subject: Hearing on my Conduct Violations Complaint against BoA President Lori Wilshire

Atty. Tim Bush
President of the Nashua Ethics Review Committee

Hi Atty. Bush:

Atty. Dory Clarke forwarded you my Conduct Violations Complaint against **Lori Wilshire, President of the Board of Aldermen**, on Wednesday 30 April.

I presume that starts the 30-day clock to a hearing before the Ethics Review Committee (ERC), per Nashua Revised Ordinance (NRO) 12-32-A.

Please contact me by phone or email (fredtee@comcast.net) ASAP so I can be apprised of the hearing date and time.

Please also advise on your procedure for subpoenas so I can call witnesses to the hearing for cross-examination.

Fred Teeboom
(603) 889-2316 (Landline) (preferred).
(603) 233-8886 (text)
fredtee@comcast.net (preferred)

Exhibit 4

THE STATE OF NEW HAMPSHIRE

HILLSBOROUGH, SS.
SOUTHERN DISTRICT

SUPERIOR COURT
No. 2023-CV-00168

Denise Muccioli

v.

City of Nashua

**ORDER ON PETITIONER'S MOTION TO RECONSIDER AND MOTION FOR
SANCTIONS AGAINST ATTORNEY BOLTON**

The petitioner, Denise Muccioli, attempted to bring this Right-to-Know action against the City of Nashua (the "City"). However, the petitioner did not name the City as a party in her pro se complaint. Rather, she identified the defendant as "Steven A Bolton, ESQ." (Compl. ¶ 2.) As a result, the Court did not issue a summons naming the City, nor did the petitioner ever request one. Instead, the Court only issued a summons for Attorney Bolton. That summons indicated that a final hearing would be held on May 8, 2023. The Court then held a hearing on that date, and Attorney Bolton appeared.

At the beginning of the hearing, the petitioner clarified that she had intended to name the City as the only respondent, and the Court issued an oral ruling changing the caption of the case to reflect that. Nonetheless, the fact remained that the Court had never issued a summons requiring the City's appearance, and therefore the Court lacked personal jurisdiction over the City in this matter at the time of the hearing. See generally Johnson v. Cintas Corp. No. 2, 811 N.W.2d 756, 768 (Wis. 2012) (explaining that "a summons that does not name the party intended to be sued fails, as a matter of law, to give notice to that party that an action has been commenced against it"); Casey v. Newport Rolling Mill Co., 161 S.W. 528, 529 (Ky. Ct. App. 1913) ("We have uniformly

held that the issuing of the summons is the commencement of the action, and that a summons, to be valid, must name the defendants to be summoned.”) Because the petitioner had not properly served a summons upon the City naming the City as a party, and she did not move for a continuance to do so, the Court dismissed the case by way of an oral ruling made at the hearing.

The petitioner now moves for reconsideration of that decision, arguing that “[t]he lawsuit was properly served under RSA 510:10 directly to the Mayor and the City Clerk[.]” (Pet’r’s Mot. ¶ 3.) The petitioner misunderstands the basis for the dismissal of this case. Even if the City was served with a summons in this case, the summons issued by the Court did not name the City as a defendant, nor did the summons require the City to attend the hearing. In other words, the defect was in the summons itself, not the sheriff’s service of that summons. The Court therefore does not find that it “has overlooked or misapprehended” any “points of law or fact” when it dismissed this case on the basis that it lacked personal jurisdiction over the City. Super. Ct. R. 12(e). The petitioner’s motion to reconsider is accordingly DENIED. To the extent the petitioner asks the Court to sanction Attorney Bolton, that request is likewise DENIED. As the petitioner herself conceded at the hearing, Attorney Bolton is not the proper party to this action and there is no basis for the Court to issue sanctions against a non-party.¹

So ordered.

Date: July 6, 2023



Hon. Jacalyn A. Colburn,
Presiding Justice

¹ 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. (See Court Doc. 3.) 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).

Exhibit 5

bush@wbdklaw.com

From: Fred Teeboom <fredtee@comcast.net>
Sent: Thursday, May 08, 2025 6:12 PM
To: 'Tim Bush'
Cc: 'Robert P. Sullivan'
Subject: You are misreading my message

Tim:

You wrote May 7, 2025 (copied below):

“You should be prepared to represent yourself in this matter.”

You are misreading my message of May 6, 2025 (copied below).

I fully intend to represent myself; but I request bringing a non-attorney co-counsel to assist me.

Earlier today I made this request part of my proposed additions to the Rules of Procedure (NRO §12-31), and expect to address this request during the Committee’s “first meeting” on 15 May, 2025

From: Tim Bush [mailto:bush@wbdklaw.com]
Sent: Wednesday, May 7, 2025 8:16 AM
To: Fred Teeboom; 'Robert P. Sullivan'
Subject: RE: Questions on the Hearing on my Conduct Violations Complaint against BoA President Lori Wilshire

Fred

You should be prepared to represent yourself in this matter.

We need to look at whether or not a non attorney can represent you.

That is an issue that should probably decided by the entire board.

I will see you on the 15th

Tim

From: Fred Teeboom <fredtee@comcast.net>
Sent: Tuesday, May 6, 2025 2:43:30 PM
To: Robert P. Sullivan <rpsulliv@portsmouthnh.gov>; 'Tim Bush' <bush@wbdklaw.com>
Subject: Questions on the Hearing on my Conduct Violations Complaint against BoA President Lori Wilshire

Atty. Bush and/or Atty. Sullivan:

Of six active members on the ERC listed on the Nashua website, at least three are currently licensed attorneys (Bush, Tencza and Robinson). Furthermore, I expect Nashua city atty. Bolton to provide counsel to Wilshire.

With yourself serving as "special counsel" to the ERC driving in from Portsmouth, NH (I understand you serve "pro-bono" but expect you're reimbursed for mileage), I may be facing five (5) attorneys.

Am I entitled to bring my own "special counsel" for assistance, who happens **not** to be an attorney-at-law?

Thanks,

Fred Teeboom

Exhibit 6

THE STATE OF NEW HAMPSHIRE

HILLSBOROUGH, SS.
SOUTHERN DISTRICT

SUPERIOR COURT
No. 2021-CV-00354

Laurie A. Ortolano

v.

City of Nashua

**ORDER ON PLAINTIFF'S MOTION TO CORRECT THE RECORD FOR THE MAY
[SIC] 25, 2024 STATUS CONFERENCE AND REQUEST TO REMOVE ATTORNEY
BOLTON FROM ALL ORTOLANO CASES**

The plaintiff, Laurie Ortolano, has brought this Right-to-Know action against the defendant, the City of Nashua (the "City"). The Court held a status conference in this matter on March 25, 2024. Ms. Ortolano now moves to "correct the record" from that hearing and further moves to have the City's lawyer, Attorney Steven Bolton, removed from this case and any other cases involving her. (See Court Doc. 55.) After the City filed an objection, (see Court Doc. 61), Ms. Ortolano filed a response, (see Court Doc. 62), followed by a motion to amend her response, (see Court Doc. 63). Ms. Ortolano also filed an exhibit with her motion to amend. (See Court Doc. 64.) For the reasons stated in this order, Ms. Ortolano's motion will be stricken by the Court.

Discussion

Ms. Ortolano initiated this case in 2021, seeking e-mails and other records from the City's assessing department pursuant to RSA chapter 91-A. Following a bench trial, the Court ruled that the City had failed to conduct an adequate search for the requested records, including failing to search the City's back-up computer tapes. The Court thus ordered the City to conduct a search of its tapes and to produce any responsive records. The City then unsuccessfully appealed that decision. See Ortolano v. City of

Nashua, 176 N.H. 175 (2023). After this matter was remanded from the supreme court, Ms. Ortolano decided that she no longer wanted any further relief in the case, so the matter was closed. However, on February 21, 2024, she filed a motion to reopen this case. (See Court Doc. 43.) The gist of her position was that this Court and the supreme court ruled in her favor, and that the City was not properly producing the records to which she was entitled pursuant to the courts' orders. The Court granted the motion to reopen the case and scheduled a status conference for March 25, 2024.

During the status conference, the Court sua sponte raised the issue of mediation concerning the issues raised in Ms. Ortolano's post-remand filings. After encouraging an expedited mediation session, the Court asked the parties directly as to whether they would agree to mediate this on-going Right-to-Know dispute. In response to this straightforward and routine inquiry, Ms. Ortolano and Attorney Bolton provided what can only be characterized as non-responsive rants concerning their opponents. These responses exemplified the unending discord between the City and Ms. Ortolano, and were par for the course in their distrustful, bitter, and unprofessional relationship. As this Court has observed, "[t]he purpose of an expedited mediation is to encourage communication tempered with both collaboration and compromise in an attempt to resolve this Right to Know litigation in a prompt manner." (Apr. 18, 2024 Court Order.) Needless to say, the parties' respective diatribes and confrontational remarks in response to the Court's simple inquiry frustrated this purpose, and were certainly not appreciated by the Court, nor did such responses advance the ball in this case.

Following the status conference, Ms. Ortolano filed the instant motion, in which she seeks to "correct the record" from the status conference. At its core, the motion to

correct the record and amended response filed by Ms. Ortolano are expansive replies to the statements made by Attorney Bolton at the status conference. With one narrow exception found in Paragraph 4, much of Ms. Ortolano's motion, as well as her amended response, are rooted in factual disputes concerning a variety of circumstances that occurred outside of the Court's presence and have little to no relevance to the limited issues presented at the status conference. The Court declines Ms. Ortolano's invitation to "correct the record" to include her take on this series of events given their lack of relevance. Rather, in the Court's view, the record is already sufficiently littered with enough information about the parties' acrimonious dealings. As such, there is no need for the record to be "corrected" to include additional irrelevant information.

Ordinarily, the Court would simply deny the motion to correct the record for the reasons stated above. Here, however, the Court is extremely troubled by some of the assertions in the motion and finds that these remarks warrant special attention. Of particular note, Ms. Ortolano's motion contains the following language:

At a [June 23, 2023 hearing in case No. 226-2022-CV-00309] Ortolano stated [to the Court], "I fucking suck at this". The Court quickly admonished Ortolano for breaking the rules of decorum. Yet, when five Attorneys would not respond to Ortolano's efforts to coordinate the court-ordered mediation, the Court remained silent on the conduct. Instead, the Court backed the Attorney's refusal to communicate, which is why we are in this entire mess. The Court is not impartial. The Court is biased and favors privileged, high-powered attorneys, where testicles and penils' are the gender of justice.

(Court Doc. 55 at 1–2, n.1 (emphases added).) The emphasized comments above from Ms. Ortolano's motion to correct record are part of a disturbing trend in her recent pleading practice. More importantly, they are not at all accurate.

First, Ms. Ortolano's perception of the June 23, 2023 hearing strains all credibility. Despite Ms. Ortolano's use of profane language during that hearing, the Court did not

"quickly admonish" her from the bench as she claims. Instead, the record reflects that the Court had a patient and calm reaction to Ms. Ortolano's self-assessment of her legal capabilities. The Court gently reminded Ms. Ortolano of her effective and respectful presentation while being self-represented in multiple other cases and simply instructed her to maintain the respect and dignity associated with court proceedings. Indeed, Ms. Ortolano conveniently omits the fact that she apologized to the Court following that hearing. Specifically, she admitted that she "disrespected and offended the Court out of frustration that center on her own deficiencies." Ortolano v. City of Nashua, No. 226-2022-CV-00309, Court Doc. 95, at 1 (June 23, 2023). Ms. Ortolano also acknowledged in that filing that she "failed to conducted [sic] herself with the grace and composure expected of herself and the Court." Id. The Court accepted Ms. Ortolano's apology in an order dated July 7, 2023. Thus, contrary to Ms. Ortolano's representation of the tenor and substance of the Court's reaction in this footnote, the record reflects that the Court was patient and forgiving with Ms. Ortolano during a moment of frustration. This misrepresentation reflects quite poorly on the quality of her motion practice.

Second, and more troubling, the language Ms. Ortolano used regarding the alleged partiality and gender bias of the Court is blatantly false, offensive, and defamatory. Assertions of gender bias that are premised on references to male genitalia are childish, irrational, ignorant, disrespectful, and vexatious. These groundless, conspiratorial character assassinations of the Court have no place in this proceeding. Unfortunately, they constitute the immaterial ramblings of a litigant who loses all sense of reality when she hides behind the keys of her computer—what is commonly referred to as a "keyboard warrior." This footnote represents a malicious

accusation aimed at the Court without any legal or factual basis. It is truly unfortunate to watch Ms. Ortolano's pleading practice enter such a downward spiral. It is sad that the current state of her advocacy rests on a foundation of hyperbolic dishonesty, divorced from any sense of reality, which borders on hate.¹

To be clear, the Court has always been impartial and has tried its best to foster an environment of civility, humility, and integrity in Courtroom 3. Ms. Ortolano's repeated allegations that the Court has some type of alliance with the City or is otherwise in the City's "pocket" is at best perplexing and at worst delusional. Indeed, in making these accusations, Ms. Ortolano seemingly ignores (or conveniently forgets) the fact that the Court ruled in her favor on the merits *in this very case* (as it has in many other cases). To be fair, her absent-mindedness could be because she has filed so many actions that she has lost track of the ones that she has won. Or, perhaps it could be because her object is never about actually winning or even gaining access to public records—it is instead about the thrill of confronting her perceived enemies in forums that she believes have no choice but to entertain her attacks.²

As to the Court's ruling on this specific motion, the Court finds that the motion to correct the record directly violates Superior Court Rule 7(e). Specifically, there were no plausible legal or factual grounds to support her untruthful allegations of bias and unfairness on the Court's part. In addition, Ms. Ortolano's use of coarse language

¹ It is somewhat ironic that Ms. Ortolano accuses the Court of being discriminatory, when it is in fact Ms. Ortolano who has made repeated attacks on the age of the Court.

² This case is a prime example. As part of its merits order, the Court indicated that it would require the City to undergo Right-to-Know training to help minimize or eliminate future Right-to-Know violations. However, on remand, Ms. Ortolano decided that she no longer wanted such relief and moved to withdraw that relief. One could therefore easily draw an inference that Ms. Ortolano enjoys fighting with the City and its employees more than ensuring compliance with the Right-to-Know law.

directed at the Court is highly inappropriate. Therefore, the Court finds that the proper remedy is to strike the motion to correct the record.³ In addition, the quoted passage above is a prime example of a vexatious, frivolous, and unreasonable motion which justifies the imposition of an award of attorney's fees pursuant Superior Court Rule 1(c). Accordingly, the Court will require Ms. Ortolano to pay the City's attorney's fees it incurred responding to this utterly ridiculous motion.⁴ Going forward, Ms. Ortolano's pleading practice must change immediately. Any further motions in this case or any other case that are filed with similar types of baseless accusations and/or crude language will likewise be summarily stricken from the record without a ruling. Simply put, if Ms. Ortolano wants the Court to consider her arguments, she must make them in a respectful manner.

By now, it should be abundantly clear that this Court has run out of patience with Ms. Ortolano's repeated hostility and personal attacks towards witnesses, court staff, opposing parties, attorneys, and the Court itself throughout the course of her self-represented cases. As suggested above, Ms. Ortolano seems to believe that this Court has no choice but to endure this behavior. However, on that point, she is wrong. If this type of behavior continues, Ms. Ortolano is on notice that the Court will exercise any and all authority it has under the Superior Court Rules, the case law, any applicable statutes, and its contempt powers to bring such a practice to a swift end. This could result in a range of consequences, including monetary sanctions, the initiation of

³ In addition, the Court notes that Ms. Ortolano continued to promulgate her false narrative about the Court in the amended response. (See Court Doc. 63). Again, this personal tirade did not address any of the procedural determinations made at the status conference.

⁴ The City shall file an affidavit of attorney's fees related to this motion within ten days of the clerk's notice of decision.

criminal contempt proceedings, and even incarceration.⁵ Ms. Ortolano is also warned that the Court is seriously considering labeling her a vexatious litigant, which will limit her ability to file any further actions without an attorney in the future. Enough is enough. Ms. Ortolano can and must do better.

So ordered.

Date: May 22, 2024



Hon. Charles S. Temple,
Presiding Justice

Clerk's Notice of Decision
Document Sent to Parties
on 05/23/2024

⁵ "The elements of criminal contempt are threefold: (1) that a valid court order covering the defendant exists; (2) that the defendant had notice of that order; and (3) that the defendant intentionally committed acts in violation of that order." State v. Stewart, 142 N.H. 610, 611 (1998). In light of those elements, the Court wants to ensure that Ms. Ortolano has clear notice of a court order that covers her. Specifically, the Court ORDERS Ms. Ortolano to address the Court in a respectful manner at all times, to refrain from the use of profanity in her filings and during hearings, to cease making baseless accusations of corruption, and to otherwise act in a civilized and respectful manner towards witnesses, opposing counsel, and court staff. The requirements of this order shall apply in this case and any other case filed in the southern judicial district of Hillsborough County Superior Court, and shall apply regardless of the specific superior court justice presiding over the case. Ms. Ortolano is explicitly put on notice that any violations of this order may serve as the basis for a civil or criminal contempt proceeding.