NEW HAMPSHIRE CIVIL LIBERTIES UNION
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November 3, 2014

VIA EMAIL AND FIRST CLASS MAIL (BennettS@nashuanh.gov)

[redacted]

Stephen Bennett, Esq.
Corporation Counsel
City of Nashua
229 Main Street
P.O. Box 2019
Nashua, NH 03061-2019

Re: Jeffery Pendleton (DOI: Approx. May 25, 2014)

Dear Attorney Bennett:

I represent Jeffery Pendleton—a 24-year-old homeless resident of the Nashua area—in connection with the damages he sustained as a result of the Nashua Police Department's ("Department") unlawful charging, detention, and prosecution of Mr. Pendleton arising out of his May 25, 2014 arrest by Officer Joshua Trefry for criminal trespass in the public park adjacent to the Nashua Public Library. This arrest was based on the Department's allegation that Mr. Pendleton was violating an April 28, 2014 verbal no-trespass order issued by Officer Trefry banning Mr. Pendleton from all library property, including the large park space and riverwalk area surrounding the library. As a result of the Department's unlawful actions, Mr. Pendleton spent 33 days in jail.

Mr. Pendleton's arrest and prosecution violated clearly-established constitutional principles in at least the four following ways:

(i) The April 28, 2014 verbal no-trespass order banning Mr. Pendleton from the park space surrounding the library violated procedural due process because (i) the order did not set out a process to contest the ban and (ii) Mr. Pendleton did not receive an opportunity to challenge its scope and duration. Given the order's unconstitutionality, Mr. Pendleton's subsequent arrest on May 25, 2014 for violating this order was unlawful.

(ii) Because there is no law that authorized the Department to issue the verbal April 28, 2014 no-trespass order related to the park space surrounding the library, there was no probable cause to arrest Mr. Pendleton on May 25, 2014 for violating this order. Thus, this arrest violated his right to be free from unreasonable seizures.

(iii) Because the April 28, 2014 verbal no-trespass order violated Mr. Pendleton's free speech rights, Mr. Pendleton's arrest on May 25, 2014 for violating this order was unlawful.

(iv) Because the April 28, 2014 verbal no-trespass order violated Mr. Pendleton's state constitutional right to intra-state travel, Mr. Pendleton's arrest on May 25, 2014 for violating this order was unlawful.

Moreover, as explained below, the Department has engaged in a disturbing and pervasive practice of issuing verbal no-trespass orders governing the park space surrounding the library without providing any procedural due process. Between July 28, 2012 and July 28, 2014, the Nashua Police Department issued at least 30 such verbal no-trespass orders governing both the library and the adjacent library park space. Multiple people have been arrested and jailed as a result of this practice.

[redacted]

The Incident

On Monday, April 28, 2014, Nashua Public Library security guard Daniel Summers allegedly saw Jeffery Pendleton, who is poor and homeless, sleeping at a desk in the library as the library was about to close at approximately 9:00 p.m. Mr. Pendleton was not bothering anyone. Mr. Summers claims that he could not wake up Mr. Pendleton and, as a result, he called the Nashua Police Department. Officer Joshua Trefry arrived and purportedly woke up Mr. Pendleton. Officer Trefry believed that Mr. Pendleton was intoxicated. Officer Trefry apparently then verbally issued a no-trespass order banning Mr. Pendleton from library property for 90 days.

Critical is the fact that this verbal no-trespass order apparently encompassed not only the physical structure of the library, but also the entire park space surrounding the library, which the Department views as "library property." Mr. Pendleton was not given a written order, nor was he provided with any mechanism to appeal its scope and duration.

On Sunday, May 25, 2014, at approximately 7:50 p.m., Mr. Pendleton was walking with a woman through the back parking lot and onto the "riverwalk" walking path that runs directly adjacent to the library. The library was closed and had been since 5:00 p.m. Officer Trefry saw Mr. Pendleton and the woman walking in this area and stopped them. Officer Trefry confirmed that Mr. Pendleton was still no-trespassed from the library as a result of the April 28, 2014 verbal order and then arrested Mr. Pendleton for criminal trespass under RSA 635:2, I. This offense was charged as a class A misdemeanor, which is punishable up to 12 months in jail and a $2,000 fine.

On Tuesday, May 27, 2014, after having been in jail for two days, Mr. Pendleton was arraigned before the District Court. $100 bail was set, which was unobtainable because Mr.

Pendleton is poor and homeless. Mr. Pendleton then sat in jail until the June 26, 2014 pretrial conference—*33 days after his arrest*. Thus, because Mr. Pendleton is economically disadvantaged, he effectively served his sentence before even being convicted of a crime.

During the June 26 pretrial conference, Mr. Pendleton was represented by a public defender. During the pretrial conference, the Nashua prosecutor indicated an intention to prosecute the case as a class B misdemeanor, which is not punishable by jail time and is only punishable up to a $1,200 fine. Mr. Pendleton, through counsel, declined to plead guilty and accept a sentence of time served, as 33 days in jail far exceeded any punishment that could be imposed if he was convicted of a class B misdemeanor.[1] Instead, Mr. Pendleton demanded a trial. The result of the prosecutor's decision to prosecute the charge as a class B misdemeanor was that Mr. Pendleton would lose his public defender representation for the upcoming trial. Mr. Pendleton was now alone. The case was scheduled for trial on September 22, 2014. Following the pretrial conference, Mr. Pendleton was released from jail, as his bail was amended to personal recognizance.

On or about August 1, 2014, the NHCLU was retained by Mr. Pendleton to defend him against the criminal trespass charge. On or about August 5, 2014, the Nashua prosecutor informed the NHCLU that the case would be nolle prossed because of where Mr. Pendleton was located at the time he was arrested—namely, park space.

The facts of this case are simple: Mr. Pendleton was arrested and spent over one month in jail for walking in a park. The case file is enclosed as *Exhibit A*.

Analysis

I. The Nashua Police Department Violated Mr. Pendleton's Clearly-Established Procedural Due Process Rights.

The April 28, 2014 verbal no-trespass order failed to provide procedural due process, and therefore Mr. Pendleton's arrest on May 25, 2014 for violating this order violated his clearly-established rights.

Part I, Article 15 of the New Hampshire Constitution provides, in relevant part, that "[n]o subject shall be ... deprived of his property, immunities, or privileges, put out of the protection of the law, exiled or deprived of his life, liberty, or estate, but by the judgment of his peers, or the law of the land ...." N.H. const. pt. I, art. 15.; *see also* U.S. const. amend XIV, § 1 ("nor shall any state deprive any person of life, liberty, or property, without due process of law"). There are two inquiries under this analysis: (1) whether the subject receiving the no-trespass order has a legally-protected interest entitling him to due process protection; and (2) if such an interest does exist, whether a constitutionally-adequate process is provided. *State v. Veale*, 158 N.H. 632, 637-39 (2009); *see also Mathews v. Eldridge*, 424 U.S. 319, 335 (1976). The no-trespass order fails under both these inquiries.

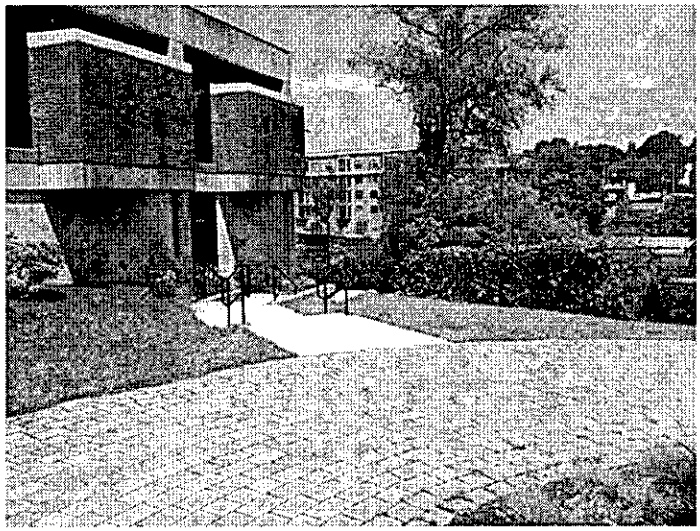
[1] 24 days in jail was the maximum that could be served for a willful failure to pay any $1,200 fine.

At the outset, it cannot seriously be disputed that a person subject to a no-trespass order has a constitutionally-protected liberty interest in visiting park space that is open to the public. *City of Chicago v. Morales*, 527 U.S. 41, 54 (1999) (plurality opinion) ("[A]n individual's decision to remain in a public place of his choice is as much a part of his liberty as the freedom of movement inside frontiers that is 'a part of our heritage,' or the right to move 'to whatsoever place one's own inclination may direct.'") (citations omitted); *see also Catron v. City of St. Petersburg*, 658 F.3d 1260, 1266-1267 (11th Cir. 2011) ("Plaintiffs have sufficiently alleged that the City has deprived them of liberty interests in two ways, by 1) enforcing the trespass ordinance to prohibit them from having access to a specific park ... as ordinarily used by the public; and 2) carrying out a policy of enforcing the ordinance to prohibit their use of all parks in the City open to the public generally.").[2]

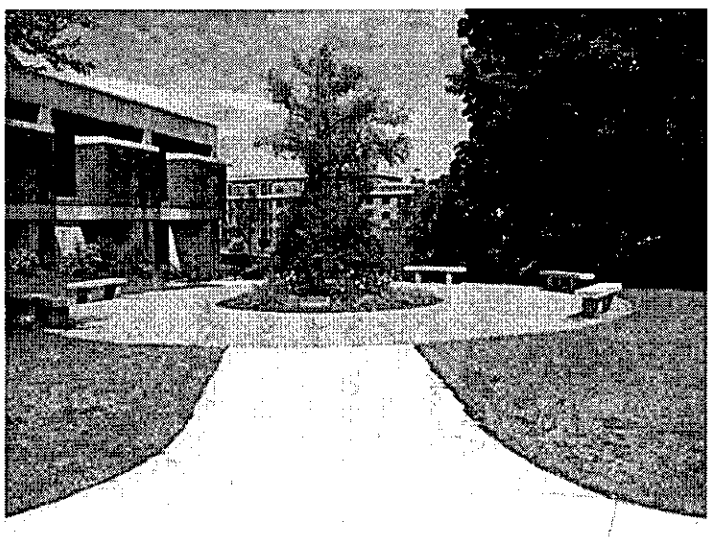
Nor can it reasonably be disputed that Mr. Pendleton was in a traditional public forum when he was arrested on May 25, 2014.[3] Below is a picture of the walkway and public space where Mr. Pendleton was walking when he was arrested:

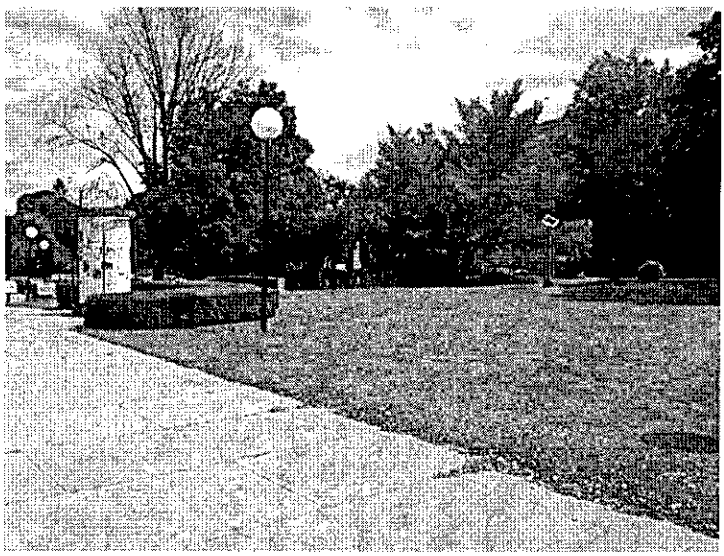
[2] It is important to note that Mr. Pendleton's procedural due process complaint is being raised with respect to restrictions on access to the public park space surrounding the library, not the inside of the library. However, citizens have a First Amendment right to physically access libraries as well, and procedural due process should be provided with respect to restrictions on this right. Nashua provides none. The First Amendment "protects the right to receive information and ideas." *Stanley v. Georgia*, 394 U.S. 557, 564 (1969); *see also Martin v. City of Struthers*, 319 U. S. 141, 143 (1943). "Although neither the Supreme Court nor the First Circuit has decided the issue, many courts have recognized that the right to receive information includes the right to some level of access to a public library, the quintessential locus of the receipt of information." *Lu v. Hulme*, No. 12-11117-MLW, 2013 U.S. Dist. LEXIS 46888, at *12-13 (D. Mass. Mar. 30, 2013); *see also Neinast v. Bd. of Trs. of Columbus Metro. Library*, 346 F.3d 585, 591 (6th Cir. 2003) (quoting *Kreimer v. Bureau of Police for the Town of Morristown*, 958 F.2d 1242, 1255 (3rd Cir. 1992)); *see also Doe v. City of Albuquerque*, 667 F.3d 1111, 1129 (10th Cir. 2012); *Armstrong v. Dist. of Columbia Pub. Library*, 154 F. Supp. 2d 67, 75 (D.D.C. 2001). A public library is often deemed to be a designated public forum. *See City of Albequerque*, 667 F.3d at 1128-30; *Kreimer v. Bureau of Police for Town of Morristown*, 958 F.2d 1242, 1256-65 (3d Cir. 1992); *Armstrong*, 154 F. Supp. 2d at 75.

[3] The Department's view that this green space is "library property" does not change the fact that this space is a park deserving of the full First Amendment protections provided to traditional public fora. Neither the City nor the Department can transform this park space into a nonpublic forum by simply calling it "library property." *See International Soc'y for Krishna Consciousness v. Lee*, 505 U.S. 672, 700 (1992) (To change a property's public forum status, the government "must alter the objective physical character or uses of the property ....") (Kennedy, J., concurring in the judgment); *see also Kreisner v. City of San Diego*, 1 F.3d 775, 785 (9th Cir.), as amended (9th Cir. 1993) (expressing "grave doubts about the City's ability, should it so choose, to withdraw the [park] from its status as a traditional public forum").



As further demonstrated by the photographs below, the space where Mr. Pendleton was arrested is a park, with green space, walk ways, and benches:





Protests have also occurred in the park space adjacent to the library where Mr. Pendleton was arrested:

See David Brooks, "Before Biden's Visit, Bus Tour In Nashua Promotes $10.10 Minimum Wage," *Nashua Telegraph* (Mar. 26, 2014), *available at* http://www.nashuatelegraph.com/news/1032246-469/prior-to-bidens-visit-bus-tour-in.html.

If there was any further doubt that Mr. Pendleton was arrested in a public forum, it is eliminated by the language of the plaque that was only feet away from Mr. Pendleton when Officer Trefry arrested him on May 25, 2014:

Given that the April 28, 2014 no-trespass order clearly deprived Mr. Pendleton of a constitutionally-protected interest to visit public park space, the next question is whether the order provides a constitutionally-adequate process. Here, it also cannot reasonably be disputed

that the order failed to provide any process, let alone a process that was constitutionally adequate. *See Vincent v. City of Sulphur*, No. 2:13-CV-189, 2014 U.S. Dist. LEXIS 67850, at *31 (W.D. La. May 14, 2014) ("[T]he court is convinced that a police officer's constitutional inability to summarily ban an individual from public property for a prolonged and indeterminate period of time constituted clearly established law at the time of the alleged events herein."). This is true for at least the three reasons below.

First, the no-trespass order received by Mr. Pendleton failed to provide adequate notice. Notice must be "reasonably calculated, under all the circumstances, to apprise" the deprived person of the deprivation, *Mullane v. Central Hanover Trust Co.*, 339 U.S. 306, 314 (1950), must include "the alleged misconduct with particularity" leading to the government's action, *In re Gault*, 387 U.S. 1, 33 (1967), and must inform the deprived person about the means for contesting the deprivation. *Memphis Light, Gas & Water Div. v. Craft*, 436 U.S. 1, 14-15 (1978). None of these elements have been satisfied here. Mr. Pendleton did not even obtain a written no-trespass order, let alone a detailed explanation for why he had been banned and how he could challenge the order.

Second, the Department provided no meaningful opportunity for Mr. Pendleton to contest the removal of his rights. Regardless of whether the opportunity was required before or after the deprivation, *see Board of Regents v. Roth*, 408 U.S. 564, 569-579 (1972) ("When protected interests are implicated, the right to some kind of prior hearing is paramount."), Mr. Pendleton was offered nothing. *See, e.g., Catron*, 658 F.3d 1260 (no-trespass ordinance caused a substantial risk of erroneous deprivation of liberty because no procedure was provided for the recipient of a trespass warning to challenge the warning or for the warning to be rescinded); *Cyr v. Addison Rutland Supervisory Union*, No. 1:12-cv-105-jgm (D. Vt. Sept. 30, 2014) ("The notices against trespass created a high risk of erroneous deprivation because they were not issued pursuant to any protocol, because they did not set out a process to contest the ban, and because Mr. Cyr did not receive a meaningful opportunity to contest his ban.").

Third, the no-trespass order was issued without any narrow, objective standards or criteria regarding when the issuance of a no-trespass order is appropriate and what its scope and duration should be. Library policy governing banishment does not address the park space surrounding the library. *See Exhibit B*.[4] Thus, it is apparent that the Nashua Police Department and library personnel are bestowing upon themselves unbridled discretion to issue overbroad orders and engage in arbitrary and discriminatory enforcement that will invite error. *See, e.g., Catron*, 658 F.3d at 1267-68 ("The trespass ordinance causes a substantial risk of erroneous deprivation of liberty because it is seemingly easy for the City ... to issue a trespass warning .... [The ordinance] provides a lot of discretion to many different city agents to issue trespass warnings for a wide range of acts. Given that these warnings operate like some kind of

[4] According to Nashua Library policy, "banishing a patron [from the library] is an absolute last resort and [should only] be used for serious infractions." The policy notes that "[m]ost incidents of unwanted behavior can be corrected with a simple conversation and sometimes asking a patron to leave for the remainder of the day." Further, "[t]he initial term of banning should not be for more than one week with the authorization of the library Director or Assistant Director. Patrons that are being banned for an extended period of time should be notified in writing ....." Finally, the policy explains that "[p]atrons can and should be banned from the library for serious infractions such as vandalism, disruptive or threatening behavior, defying staff authority to enforce the code of conduct and in cases where someone repeatedly violates the code of conduct after being spoken to."

injunction, this situation creates a substantial risk of erroneous deprivation of liberty."); *State v. Chong*, 121 N.H. 860, 862 (1981) ("The ordinance is particularly offensive because it gives one governmental official unfettered discretion to determine who may distribute handbills in the city of Keene. No standards guide the chief of police in deciding whether to issue a permit.").[5]

Just as disturbing, the Nashua Police Department has a policy, practice, and custom of issuing no-trespass orders banning others from the park space near the library. This creates the prospect of municipal *Monell* liability and indicates that the Department has failed to properly train its officers concerning the constitutional limits that exist with respect to the issuance of no-trespass orders on public property. Between July 28, 2012 and July 28, 2014, the Nashua Police Department issued at least 30 no-trespass orders with respect to the library and the adjacent library park space (10 of which were expired as of July 28, 2014, and 20 of which were active as of July 28, 2014). *See* Exhibits C and D enclosed. Some examples are below:

- On Wednesday, April 30, 2014, at approximately 11:30 p.m. while the library was closed, John Goba was sitting on the property of the Nashua Public Library on a bench smoking a cigarette. Officer McDermott approached Mr. Goba. Officer McDermott believed that Mr. Goba was intoxicated, though it is clear from Officer McDermott's narrative that Mr. Goba was not harming or interacting with anyone. Mr. Goba complained to Officer McDermott that "he was only smoking a cigarette and that [the officer] was harassing him." Mr. Goba explained that he was staying at 14 Pratt Street and that "he came to the library to smoke a cigarette and that he would be walking back home." Officer McDermott did not believe Mr. Goba, writing in his narrative that he found "it odd that someone would walk approximately one mile in a rain storm just to smoke a cigarette." Officer McDermott then ran Mr. Goba's name and was informed that Mr. Goba received a verbal, one-year no-trespass order on November 12, 2013 with respect to library property from Officer Matt Giftos and library staff member Roger Allen. Officer McDermott then arrested Mr. Goba for criminal trespass. Mr. Goba complained that he was "not doing anything wrong on the property." There was no evidence that Mr. Goba was committing a crime, except that he had received this verbal, one-year no-trespass order on November 12, 2013. *See* Exhibit E enclosed. Mr. Goba apparently received this

[5] The Gernstein Affidavit completed by Officer Trefry and which provided the basis for the Circuit Court's finding of probable cause did not include any facts concerning the April 28, 2014 no-trespass order, including the basic—and ultimately dispositive—fact that Mr. Pendleton was not given an opportunity to appeal or challenge the scope of the April 28, 2014 verbal no-trespass order, which covered a traditional public forum. Nor did the Affidavit explain that the library was closed, that Mr. Pendleton was arrested in a park, or that there is no state or municipal law allowing the Nashua police to issue blanket no-trespass orders with respect to public parks. Thus, the liability of Officer Trefry and the Nashua Police Department was not severed at arraignment, nor can Officer Trefry successfully use the Circuit Court's finding to claim qualified immunity. *See Burke v. McDonald*, 572 F.3d 51, 58 (1st Cir. 2009) ("[A]n exception to that rule [that damages are limited to the period preceding the arraignment] exists where facts are withheld from the prosecutor or judge such that the affected official(s) cannot be understood to have exercised an informed, independent judgment"; noting that "liability under § 1983 flows against the defendant for all damages that are the natural consequences of his actions.") (quotations omitted); *Malley v. Briggs*, 475 U.S. 335, 341 (1986) (there is no grant of qualified immunity if "it is obvious that no reasonably competent officer would have concluded that a warrant should issue").

November 12, 2013 no-trespass order for sleeping and snoring in the library theater.

- On Wednesday, June 18, 2014, Officer McDermott arrested John Goba, who disclosed he was homeless, for sitting on a bench near the library at 11:30 p.m. when the library was closed. Mr. Goba was charged with criminal trespass. Once again, there was no evidence that Mr. Goba was committing a crime, except that he had received a verbal, one-year no-trespass order on November 12, 2013 with respect to library property. Mr. Goba spent approximately two days in jail before being released. *See Exhibit F* enclosed.

- On Tuesday, July 8, 2014 at 7:30 p.m., Officer Trefry arrested Steve Connell for criminal trespass for sitting on a park bench adjacent to the library, as he had been "no-trespassed" from the library for one year on May 29, 2014. Mr. Connell spent approximately three days in jail before being released. *See Exhibit G* enclosed.

- At 3:15 p.m. on Monday, September 1, 2014—Labor Day when the library was closed—Officer Michael Hatzipetros arrested David Small, who was homeless, for criminal trespass for walking through the parking lot adjacent to the library, as Mr. Small was apparently no-trespassed from the library on August 14, 2014. Mr. Small spent approximately two days in jail before being released. *See Exhibit H* enclosed.

As these examples demonstrate, this practice is disproportionately impacting the poor and homeless.

II. The Nashua Police Department Violated Mr. Pendleton's Clearly-Established Fourth Amendment Rights.

Because there is no state or municipal law that authorized the Nashua Police Department to issue the April 28, 2014 verbal no-trespass order related to the park space surrounding the library, Mr. Pendleton's arrest on May 25, 2014 for violating this order infringed upon his clearly-established Fourth Amendment right to be free from unreasonable seizures.

The Fourth Amendment and Part I, Article 19 of the New Hampshire Constitution prevent unreasonable seizures of persons. Where an "officer, by means of physical force or show of authority, has in some way restrained the liberty of a citizen ... a 'seizure' has occurred." *Terry v. Ohio*, 392 U.S. 1, 19 n.16 (1968); *see also United States v. Mendenhall*, 446 U.S. 544, 553 (1980).

Here, Nashua's practice of detaining and arresting individuals following perceived violations of no-trespass orders governing library park space is without either reasonable suspicion or probable cause that a crime has been committed because the Nashua Police Department simply has no legal authority to issue no-trespass orders on public park space. Put another way, absent the commission of an actual crime or statutory authority that passes

constitutional muster, law enforcement do not have the statutory authority to determine whether, under RSA 635:2, I, a person is not "licensed or privileged" to enter or remain in a public park through the issuance of a no-trespass order.

III. The Nashua Police Department Violated Mr. Pendleton's Clearly-Established First Amendment Rights.

Even if there was some statutory regime allowing the Nashua Police Department to issue no-trespass orders with respect to public park space, it would—as does the April 28, 2014 no-trespass order itself—create serious First Amendment concerns. Traditional public fora like the park adjacent to the library are, as the New Hampshire Supreme Court has explained, "fundamental to the continuing vitality of our democracy, for 'time out of mind, [they] have been used for purposes of assembly, communicating thoughts between citizens, and discussing public questions.'" *Doyle v. Comm'r, N.H. Dep't. of Resources & Economic Dev.*, 163 N.H. 215, 223 (2012) (quoting *Boos v. Barry*, 485 U.S. 312, 318 (1988)). Thus, given the unique status of parks, government entities like the City of Nashua "are strictly limited in their ability to regulate private speech in [such forums]." *Pleasant Grove City v. Summum*, 555 U.S. 460, 469 (2009).

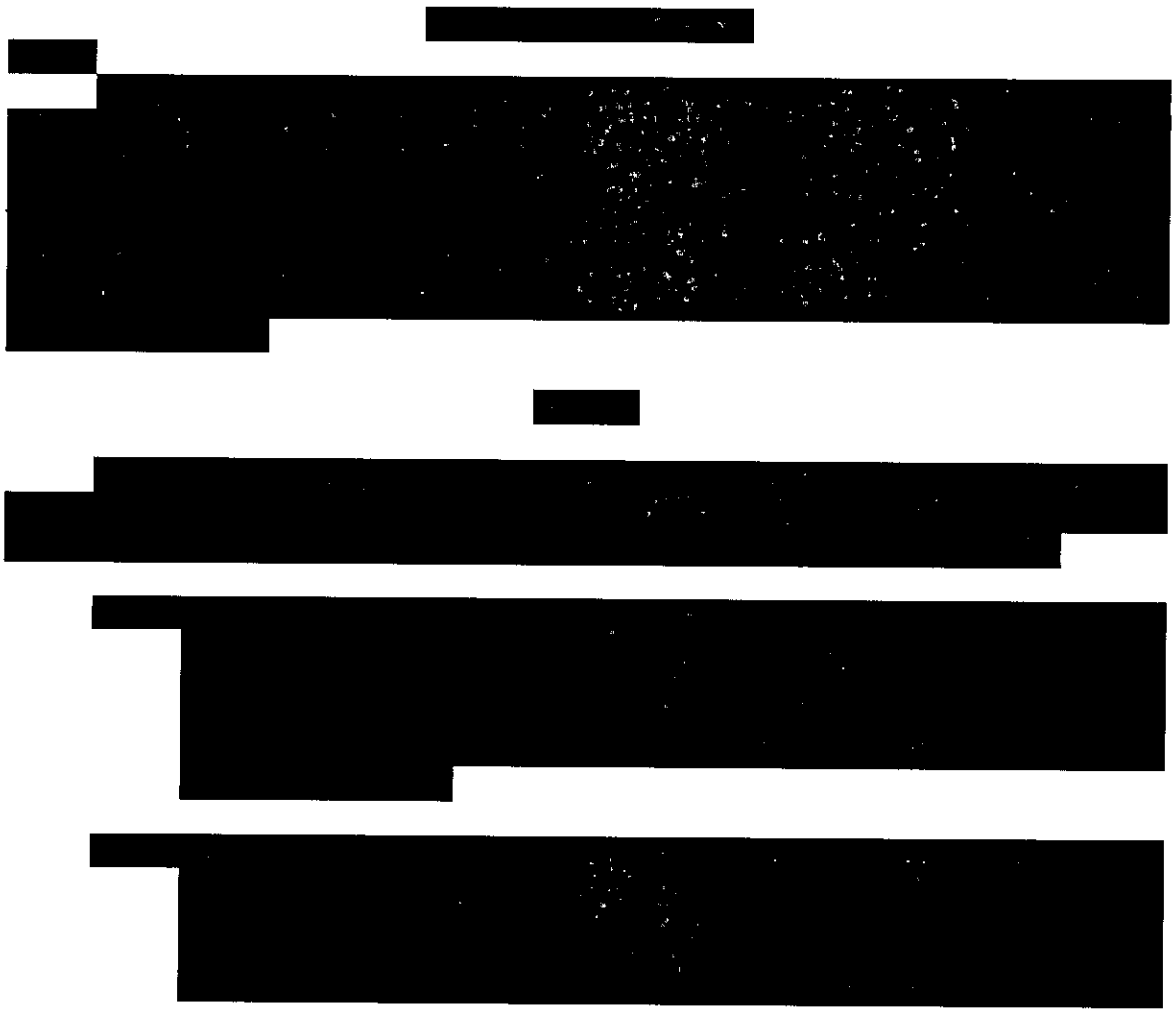
Here, the April 28, 2014 no-trespass order violated Mr. Pendleton's clearly-established free speech rights under the First Amendment and Part I, Article 22 of the New Hampshire Constitution. Whatever municipal interests Nashua claims justified the no-trespass order banning Mr. Pendleton's presence in the library park, the blanket order is clearly overbroad and not narrowly tailored with respect to these asserted interests. *See State v. Chong*, 121 N.H. 860, 862 (1981) (in holding that a city ordinance prohibiting the distribution of handbills, concluding as follows: "Keeping the streets free from litter is insufficient justification for an ordinance requiring individuals to obtain a permit prior to distributing handbills. If the defendants were to litter, they could, of course, be charged with that violation."); *McCullen v. Coakley*, 134 S. Ct. 2518, 2531 (2014) (in striking down 35-foot buffer zone around reproductive health care facilities, explaining that there were ample alternatives that would more directly address the government's asserted public safety interests without substantially burdening speech, including "criminal statutes forbidding assault, breach of the peace, trespass, vandalism, and the like"); *Burk v. Augusta-Richmond Cnty.*, 365 F.3d 1247, 1256 (11th Cir. 2004) ("Excessive discretion over permitting decisions is constitutionally suspect because it creates the opportunity for undetectable censorship and signals a lack of narrow tailoring.").

IV. The Nashua Police Department Violated Mr. Pendleton's Clearly-Established Right To Travel.

The April 28, 2014 verbal no-trespass order also impermissibly burdened Mr. Pendleton's fundamental right to travel—which is protected by the New Hampshire Constitution and the Fourteenth Amendment—by punishing wholly innocent or constitutionally-protected conduct (i.e., travelling in a municipality through a park). *See Donnelly v. Manchester*, 111 N.H. 50, 51 (1971) ("The right of every citizen to live where he chooses and *to travel freely not only within the state* but across its borders is a fundamental right which is guaranteed both by our own and the Federal Constitutions.") (emphasis added); *Angwin v. Manchester*, 118 N.H. 336 (1978);

Merrill v. City of Manchester, 124 N.H. 8, 15 (1983) (applying strict scrutiny to abridgement of fundamental right).

Just as the no-trespass order is not narrowly tailored to serve a significant governmental interest for the reasons stated above, the order also cannot satisfy the heightened form of strict scrutiny that would be applied by a court. *See State v. Burnett*, 755 N.E.2d 857, 864-66 (Ohio 2001) ("Any deprivation of the right to travel, therefore, must be evaluated under a compelling-interest test .... It is our opinion that while Chapter 755 [which permits the issuance of no-trespass orders from drug-exclusion zones] is justified by a compelling interest, it fails constitutional analysis because the ordinance is not narrowly tailored to restrict only those interests associated with illegal drug activity, but also restricts a substantial amount of innocent conduct .... A narrowly tailored ordinance would not strike at an evil with such force that constitutionally protected conduct is harmed along with unprotected conduct."); *Johnson v. City of Cincinnati*, 310 F.3d 484, 498 (6th Cir. 2002) (recognizing right to intrastate travel and holding that Ohio law in *Burnett* permitting the issuance of no-trespass orders from drug-exclusion zones was not narrowly enough tailored to survive scrutiny).



[redacted]

Very truly yours,

/s/ Gilles R. Bissonnette
Gilles Bissonnette
NHCLU, Staff Attorney
Gilles@nhclu.org

cc: Lawrence Vogelman

Enclosures