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QUESTION PRESENTED

1. May the Town of Hanover lawfully delegate governmental authority to a private party, Dartmouth College, which authority encompasses the authority to regulate the use of neighboring and abutting properties, without providing any standards or safeguards to guide the College's use of the delegated authority?

STATEMENT OF INTEREST OF THE *AMICI CURIAE*¹

Amici are private, non-profit fraternal organizations that own real property and improvements adjacent to the campus of Dartmouth College in the Town of Hanover. On a continuous basis dating back to the 19th Century, *amici* have used their property for student housing, social gatherings, educational events, alumni meetings, and other purposes consistent with their respective organizational missions. For generations, Greek life at Dartmouth has provided an opportunity for social, political, religious, academic, community service and philanthropic activities. The undergraduate Greek-member tenants of the properties engage in academic discussion, athletic competition, and charitable activities that began in the 1800s and continue to this day.

Over the past 20 years, as Dartmouth's oversight and regulation of fraternities has grown ever more stringent, the tenants of *amici* have worked diligently to comply with applicable College policies and requirements. At present, the undergraduate tenants of *amici* are recognized by the College and are in conformity with Hanover's zoning requirements. However, *amici* are gravely concerned by a recent pivot in the enforcement of Hanover's zoning ordinance. As evidenced by the record below, the Town's interpretive pivot vests sole and unreviewable power in the hands of the College to determine whether privately-owned fraternity houses adjacent to

¹ *Amici* notified the parties of their intent to file this brief and requesting consent to such filing. The Town of Hanover refused to either consent or withhold consent to this filing, which failure required *amici* to file a Motion for Leave to File this brief. New Hampshire Alpha of SAE Trust consented to this filing in writing.

Dartmouth's campus are – or are not – in conformity with the Town's zoning requirements. *Amici* therefore have a keen interest in the outcome of this appeal. If the Town were to prevail, and if *amici* were to incur the College's disfavor at some point in the future, then under the Town's zoning ordinance the College could, by dint of de-recognition, effect a summary, unreviewable, and permanent deprivation of *amici's* property rights.

As outlined below, *amici* have a rich and robust history at Dartmouth College.

Phi Delta Alpha Corporation owns a plot of land and a large house located on Webster Avenue in Hanover. Its predecessor organization, Phi Delta Theta, purchased the land in 1898, and the house was completed in 1902. Today Phi Delta Alpha's tenants have approximately 83 undergraduate members, 25 of whom reside in the physical plant. The Phi Delta Alpha house, one of the last remaining wooden structures on Webster Avenue, has a distinguished architectural pedigree and sits in a premier location. Scott Meacham, *Halls, Tombs and Houses: Student Society Architecture at Dartmouth*, DARTMO.COM, <http://www.dartmo.com/halls/hallscontent6.html> (last modified Aug. 22, 2005). College-owned property completely surrounds the home, with the exception of other privately-owned Greek houses to either side which themselves are surrounded by College land. The home has access to first-year dormitories to the north and classroom buildings to the south, with the library a few hundred yards down the street to the east. The Phi Delta Alpha alumni corporation boasts over one thousand living alumni, many of whom regularly visit the property.

Zeta Association of Psi Upsilon formed its Dartmouth chapter in 1842 and built its home on West Wheelock Street in 1907, where it continues to operate. Psi Upsilon's property, located in a prime, central location, is abutted by the College on two sides and adjacent to the Dartmouth student center and main dining hall. The home and its members are well known among

Dartmouth alumni and current students for their rigorous support of the core values of Dartmouth College including leadership, morality and scholarship. The 100+ undergraduate chapter members consistently maintain a very high GPA that is above the College average. Founded in 1841 and affiliated with the national Psi Upsilon fraternity since 1842, the home boasts the oldest fraternal organization in the town of Hanover. The alumni organization of the Zeta Chapter of Psi Upsilon comprises over 1400 living and active alumni all over the world.

Trustees of Alpha Omega Chapter of Beta Theta Pi Fraternity owns property abutted by the College on two sides. Beta Alpha Omega is the legacy fraternity of the Trustees of Alpha Omega Chapter of Beta Theta Pi Fraternity, which was founded in 1889 and incorporated in New Hampshire in 1900. Beta purchased its property at 6 Webster Avenue in 1932, shortly after which time it constructed its current chapter house, which sits with its six majestic columns at the southeast head of Webster Avenue, closest to Baker Library. During the past 10 years, the corporation has invested more than \$500,000 in upgrades to its property. Beta has approximately 1,000 living alumni, as well as 96 undergraduate brothers, 17 of whom live in the house. The corporation is governed by a board of 22 trustees from 10 states and the District of Columbia. Beta Alpha Omega is known for the diversity of interests of its members, its respect for all, and its development of leaders. Beta alumni include or have included members of Congress, governors (e.g., Walter Peterson '47), military officers (e.g., former U.S. Capitol physician Rear Adm. Dr. John Eisold '68), leaders of business and academia (e.g., former Dartmouth President David T. McLaughlin '54), and members of amateur and professional sports halls of fame (e.g., Dave Gavitt '59), as well as creative artists such as Norman Maclean '24 (*A River Runs Through It*).

Dartmouth's open and progressive Greek system is unique in the Ivy League. Nonmembers of fraternities, sororities, and co-educational houses are welcome to attend almost all events held at these houses. Public assembly spaces and meeting halls account for much of the space on the properties, but members reside in these historical homes and contribute to the character of their organizations as a result. A free and open exchange of ideas in an informal setting creates connections and contributes to the College's sense of community.

While making significant contributions to the College, Greek organizations maintain their longstanding independence. They do so by raising their own funds by charging undergraduate tenants rent and soliciting donations from alumni and other donors. These funds go toward upkeep of their physical plants, expenses for social activities, and philanthropy for the wider community. For instance, Dartmouth Greek undergraduate tenants raised over \$39,000 for a Children Hospital at Dartmouth fundraising event in 2013. Joseph Asch, *Greeks Bearing Gifts*, DARTBLOG, (Oct. 22, 2013) <http://www.dartblog.com/data/2013/10/011124.php>. Psi Upsilon alone raised over \$7,000. *Id.* Houses tend to participate in multiple events every year, both on their own and in conjunction with other Greek organizations, and their alumni are generous donors to the organizations and to the College. *See* Stephanie G. Wapner, *Organizational Identification and Alumni Giving: The Role of External Student Organizations*, 21 (2017) (Graduate Program Dissertation, Ohio State University) (available at http://rave.ohiolink.edu/etdc/view?acc_num=osu1500587887267762) (stating, "Existing literature on greek organizations almost universally agrees . . . that fraternity or sorority affiliation is positively associated with individual alumni gifts.").

In recent years, *amici* have made notable contributions to the Upper Valley community. For example:

- Last year, Phi Delta Alpha received the Volunteer Service Award from the Town of Hanover's Parks and Recreation Board for its "strong tradition of volunteerism" exemplified by its "many years" of coaching Hanover's 7th and 8th grade baseball teams. Town of Hanover N.H., *Annual Report for the Fiscal Year Ending June 30, 2017 & 2018 Town Meeting* 164, https://www.hanovernh.org/sites/hanovernh/files/uploads/2017_town_report_-_for_web.pdf (last visited Apr. 24, 2018). At the end of each little league season, the players and their families attend a barbeque hosted in the front yard of the Phi Delta Alpha property. Funds from rental income enable all of these activities.
- Psi Upsilon reported 1900 community service hours in 2012. Psi Upsilon, *Chapter News 2012-13*, PSIU.org, <http://www.psiu.org/?13news#zeta> (last visited Apr. 24, 2018). The fraternity contributes to multiple causes including Dartmouth Student Accessibility Services, Athletes United, and the Dartmouth Prison Project. *Id.*
- From January 2017 through April 2018, Beta Alpha Omega undergraduate brothers sponsored, hosted, and/or participated in 16 different individual or types of public service or charitable events, some recurring or ongoing (such as volunteering at food banks) and raised more than \$5,000 for various charities.

Greek Organizations also contribute to the academic and personal development of their members. Many students learn to care for their own home for the first time while residing in a Greek house. Undergraduate members of the organizations are responsible for electing a leadership board that sets a budget and manages all of the rental income and expenses on behalf of the property owner. Men and women in their early twenties have the responsibility to manage budgets over \$100,000 per year. Students cooperate with the Hanover Police, campus police, and other officials and agencies. Greek life is for many an early opportunity to develop leadership skills.

By contrast, organizations on College-owned land do not raise rent or manage upkeep of their physical plants, and operate much smaller budgets. Perhaps thanks to the opportunity to take increased responsibility and live with their fellow brothers and sisters, members often achieve a grade point average higher than their non-Greek peers. *See College Pulse, Greek Life*

Academics, Infogram, <https://infogram.com/f5ffa293-79d0-4d2f-924d-ddfbc1c70ef6> (last visited Apr. 24, 2018). For instance, Psi Upsilon members' GPAs were five hundredths of a point higher than the total undergraduate average over the course of five years. *Id.* Members also benefit from racial and ethnic diversity among their cohabitants in their Greek houses, leading to a robust exchange of ideas and viewpoints. *See* College Pulse, *IFC Pre-Rush*, Infogram, <https://infogram.com/2a9c4b86-b9b5-4a6f-b31d-e1d8e40f8a1a> (last visited Apr. 24, 2018) (representing data on new members interested in joining fraternities).

Amici have an acute and significant need to maintain their organizations' independence from the College so that they may continue the historic use of their properties. Because residential use drives the income necessary to undertake all other programming, allowing residential functions at these properties is critical to the continuation of these historic uses. As corporate citizens of Hanover, with substantial assets at risk, *amici* are entitled to a fair zoning regime. If the Ordinance were applied to *amici's* properties as it was to appellant's property, *amici* would be deprived of any economically viable use of their properties and would inevitably cease to exist.

STATEMENT OF THE CASE AND FACTS

Appellant NH Alpha of SAE Trust (the "Trust") owns real property located at 38 College Street in the Town of Hanover (the "Property"). The Property is located in a central location surrounded by the campus of Dartmouth College. Dartmouth uses its abutting and surrounding properties for a variety of uses including student housing and dormitories. Student housing is an important component of Dartmouth's educational mission. (*See generally* Appendix to *Amici Curiae* Brief ("App.") at 237).

For its part, the Trust is also in the business of providing housing on a non-profit basis as the primary means of financially supporting its organizational mission. The Trust leases the Property to the New Hampshire Alpha Chapter of Sigma Alpha Epsilon, Inc. ("SAE"), a New Hampshire not-for-profit corporation. SAE in turn rents the Property to its members. SAE has continuously occupied the chapter house on the Property since at least 1931. Indeed, the location and configuration of the Property renders it unusable for any private purpose other than a chapter house. (*See generally* App. at 237).

On February 5, 2016, without notice, hearing or any process whatsoever, Dartmouth revoked its recognition of the SAE chapter as a student organization. The College immediately notified the Town that it had revoked SAE's recognition. Just one week later, on February 12, 2016, Hanover issued a zoning violation notice informing the Trust that it could no longer use the Property as a "student residence." Under the Hanover Amended Zoning Ordinance ("Zoning Ordinance" or "Ordinance"), a "student residence" is defined in part as follows: "A building designed for and occupied by students and operated in conjunction with another institutional use." In Hanover's view, the other "institutional use" referred to the College. Accordingly, and based solely on the College's unreviewable decision to revoke its recognition of the SAE chapter, the Town determined that the chapter house was in violation of the Ordinance because it no longer "operated in conjunction with another institutional use." (*See* App. at 1).

The Trust appealed the violation to the Hanover Zoning Board of Adjustment ("ZBA"). The Town notified Dartmouth, an abutter to the Trust's land, via certified mail of the ZBA hearing date and its right to appear and produce evidence, but Dartmouth declined to appear. (*See* App. at 2-6). At the ensuing hearing, the ZBA sustained the Trust's appeal, reversing the

issuance of the zoning violation notice and finding that the Trust's use of the Property as a "student residence" was a lawful non-conforming use. (*See App. at 2-6*).

Significantly, however, the ZBA decision noted that "it is conceivable that contrary evidence could be adduced if a party with standing to request a rehearing (such as the College itself) were to present such evidence." (*See App. at 5*). This was not an idle observation. In fact, as the record shows, before the ZBA issued its written decision, ZBA member Bernie Waugh sent an email to the Zoning Administrator, urging the Zoning Administrator to send the ZBA's written decision to the College so that it would be aware of its "chance to ask for a rehearing." (*See App. at 7*).

The College followed the ZBA's direction by requesting a rehearing, identifying no errors of law and introducing no facts that had been newly acquired. Indeed, the College acknowledged that it filed the motion in direct response to the invitation. (*See App. at 12*). The Trust objected to no avail; the ZBA held a public rehearing on June 23, 2016.

At the rehearing, the Trust challenged the standing of the College to participate in the proceeding. After all, Dartmouth had received proper notice of the original hearing as an abutting owner but decided, of its own volition, not to participate in the original hearing. Dismissing the standing argument, the ZBA stated as follows:

Regarding the argument that the College lacks standing as an aggrieved party, Dartmouth College is an abutter to the landowner in this matter and thus qualifies as a party "directly affected" by the appellant's appeal.

(*See App. at 13*).

Dartmouth thereafter proceeded to introduce evidence. A representative of the College, Kevin O'Leary, testified that Dartmouth College may de-recognize any student organization for any reason or no reason:

“we are entitled through whatever process we want to decide whether we are going to continue to have a relationship with an organization or not. That’s a right we have.”

(See App. at 132). With respect to the devastating impact the arbitrary recognition process may have on a property owner such as the Trust, Mr. O’Leary essentially washed his hands:

The effect that that decision has on that organization’s other rights, whether it’s a right to have, to run a student residence, to run a student business or to do any number of things is not for us to say. *It’s up, in this case, up to the Town to say.”*

(See App. at 132)(Emphasis added.)

At the hearing, the Trust introduced evidence that Dartmouth had expressed a desire and plan to acquire the remaining independent Greek properties abutting the Dartmouth campus with a view to re-purposing them to College use. The College reduced this desire and plan to writing in its strategic plan:

As it commits to a residential house experience, the College should be prepared to house any students displaced by [new standards for student housing]. Further, with respect to any organizations in privately-owned residences that are derecognized, the College should be prepared to (1) report the derecognized House to the Town of Hanover, to ensure compliance with any applicable zoning or other laws *and* (2) acquire their facilities and repurpose them for the College’s residential, social and academic purposes.

(See App. at 211). The Trust argued that Dartmouth’s decision-making regarding the Trust was at best arbitrary, and at worst part of a premeditated plan to acquire the Property.

At the conclusion of the hearing, the ZBA reversed itself and affirmed the issuance of the zoning violation. (See App. at 8-16). The Trust sought rehearing, which the ZBA denied. The Trust appealed the ZBA decision to the Grafton Superior Court, which affirmed. (See App. at 237-248). This appeal followed.²

² The trial court did not address an important issue raised by the Trust below: whether the Hanover Zoning Ordinance unlawfully delegates governmental authority to the College. Noting the court’s failure to address this

SUMMARY OF ARGUMENT

Under the Town's interpretation of the Zoning Ordinance, if a student organization loses Dartmouth recognition, then the organization is no longer "operated in conjunction with another institution" and is, therefore, unlawful. In making this interpretation, the Town delegates completely to Dartmouth the determination as to whether a student organization may or may not operate "in conjunction with" Dartmouth. In other words, the Town delegates to Dartmouth College the authority to determine the lawfulness of an existing and otherwise permitted use.

The Town's delegation of authority is sweeping, unbounded, and effectively unreviewable. There are no standards or other criteria to guide Dartmouth's determinations. In essence, the property rights of private fraternal organizations exist only at the whim of the College's unilateral and discretionary decision-making.

This is especially troubling because Dartmouth has a strategic plan to use the de-recognition process to initiate zoning violation proceedings, thereafter acquiring assets adversely impacted by the zoning process. As noted by the ZBA in permitting Dartmouth standing to participate in the proceedings below, Dartmouth is an abutting landowner that is "directly affected" by the outcome of this zoning case.

In sustaining the Town's delegation of authority to the College, the trial court did not adhere to applicable legal precedent. The Town's delegation of governmental authority to Dartmouth lacks any standards or safeguards, and is accordingly unlawful.

argument, the Trust filed a motion for reconsideration asking that the court specifically rule on the issue, but the trial court denied the motion without comment on the merits of the argument. (*See App. at 249*).

ARGUMENT

I. THE TRIAL COURT ERRED IN SUSTAINING ZONING ENFORCEMENT ACTION BASED UPON A ZONING ORDINANCE CONTAINING AN UNLAWFUL DELEGATION OF GOVERNMENTAL AUTHORITY.

The Hanover Zoning Ordinance delegates governmental authority to Dartmouth College by granting the College an unreviewable veto power over the otherwise lawful operations of its neighbors and competitors in the student housing business. The Ordinance requires that a fraternity be “operated in conjunction with another institutional use,” and in *Dartmouth Corp. of Alpha Delta v. Town of Hanover*, 169 N.H. 743, 754 (2017), this Court construed the Ordinance to require that a fraternity “have some union, association or combination with the College.” As a consequence, if Dartmouth derecognizes a fraternal organization, thereby withholding its assent to a “union, association or combination,” the property’s use is deemed illegal. This legislative regime amounts to an unlawful delegation of governmental power.

Under applicable precedent, a governmental delegation of authority is valid only if it is accompanied by meaningful standards and procedural protections. In *Guillou v. Div. of Motor Vehicles*, 127 N.H. 579 (1986), this Court struck down a statute that permitted the director of motor vehicles to order “any license issued to any person under the provisions of this title to be suspended or revoked, after due hearing, for any cause which he may deem sufficient.” *Id.* at 580. As the Court explained, the statutory grant of authority to the director was invalid because it was overbroad and lacked “any express or implied qualifications” to guide the director’s discretion. *Id.* at 581 (emphasis in original). The Court expressed concern that, under this regime of unchecked and unbounded authority, “the potential for arbitrary and unprincipled decisions is great.” *Id.*; see also *Fernald v. Bassett*, 107 N.H. 282, 284 (1966) (striking down

zoning ordinance on grounds of unlawful delegation because the ordinance “failed to establish standards by which the board should be governed” in its decision making).

The Ordinance at issue here raises the same concerns expressed by this Court in *Guillou*. In fact, the Ordinance is even more problematic because unlike the statute in *Guillou*, which required “due hearing” before commencing an arbitrary decision process, the Ordinance dispenses with even the need for a hearing and vests Dartmouth with unreviewable discretion to render the use of the Trust’s property unlawful.

The complete failure of safeguards is especially alarming when one considers that Dartmouth has a direct interest in the matter as an abutting property owner with a publicly expressed intention to acquire assets such as the Property. (*See App.* at 211). As this Court has recognized, “[d]elegations of governmental functions to private individuals are permitted so long as proper safeguards are provided.” *Portsmouth v. Ass’n of Portsmouth Teachers, NEA*, 134 N.H. 642, 646 (1991) (emphasis added); *see also Id.* (“[T]he issue is not whether such delegation may occur, but rather whether sufficient safeguards against arbitrariness are provided.”) (citing K. Davis, *Administrative Law Treatise* 54 (Supp. 1970)).

Here, however, the Ordinance contains no safeguards against arbitrary action. To the contrary, it straightforwardly delegates the decision about “institutional use” to the College, whose representative testified at the ZBA hearing that the College was “entitled through whatever process we want to decide whether we are going to continue to have a relationship with an organization or not. That’s a right we have.” (*See App.* at 132). Such a delegation is not sustainable.

The United States Supreme Court long ago recognized the danger when a local government allows private landowners to make conclusive determinations about the use of

someone else's property. In light of the obvious potential for conflict of interest or other unfairness, the Court made clear that unbounded delegation of decision making authority to neighboring landowners is invalid; instead, the government instrumentality itself must be the decision maker pursuant to a lawful process that comports with Constitutional standards of fairness and due process. See *Eubank v. City of Richmond*, 226 U.S. 137, 143 (1912) (striking down municipal ordinance giving neighboring landowners discretion to determine setbacks and height restrictions); *Washington ex. rel. Seattle Trust Co. v. Roberge*, 278 U.S. 116, 121–22 (1928) (invalidating provision requiring consent of two-thirds of nearby landowners in order to use property as a philanthropic home for children or the elderly).

The teachings of *Eubank* and *Roberge* remain apt today. Under applicable precedents from this Court plus longstanding Supreme Court precedent, the Ordinance reflects an invalid delegation of authority to a private party whose commercial and economic interests conflict with those of appellant. For this reason, the lower court's decision should be reversed.

CONCLUSION.

For the foregoing reasons, the Ordinance should be held invalid and the judgment of the Superior Court should be reversed.

Respectfully submitted,

PHI DELTA ALPHA CORPORATION, ZETA
ASSOCIATION OF PSI UPSILON, and
TRUSTEES OF ALPHA OMEGA CHAPTER OF
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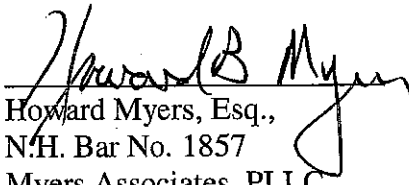
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