

Town of Londonderry, New Hampshire 268B Mammoth Road ● Londonderry, NH 03053 (603) 432-1100 ● londonderrynh.gov

Town Council Meeting - Agenda Item Coversheet

Meeting Date: 8/18/2025 Contact Information: Email or Telephone

Submitted By: TM Shaun Mulholland **Estimated Discussion Time:** 20 Minutes

Department: Town Manager's Office **Agenda Item Number:** F. 2

Agenda Item Title: Accept, discuss and take appropriate action regarding the investigative report involving a Town Councilor.

Background and Purpose: The Town Council on June 2, 2025, voted to receive three complaints submitted by a resident regarding alleged violations of the Town's Ethics Code Chapter XXVI by a Town Councilor. The Town Council voted to direct the Town Manager to select an investigator and take the necessary actions to ensure the complaints were investigated. The Town Manager contracted with the law firm Donohue, Tucker and Ciandella to conduct the investigation. The report from Attorney Eric Maher of DTC was sent to the Town Manager and is now before the Town Council to receive the report. Once the Council officially accept the report as complete it will discuss the findings to determine if any further action is appropriate.

Action: Accept the investigative report from DTC Law Firm regarding the complaint alleging violations of the Town's Code of Ethics. Discuss the findings in the report, make a finding of Unfounded or Sustained and take any other action as deemed appropriate.

Proposed Motion:

Motion #1: MOVED, that the Londonderry Town Council accepts the investigative report and findings from the law firm of Donohue, Tucker and Ciandella relative to the alleged acts by Town Councilor Debra Paul detailed in the complaints filed on April 30, May 1 and May 8, 2025 regarding violations of the Town's Code of Ethics.

Motion#2: MOVED, that the Londonderry Town Council based on the findings of the investigation of alleged acts by Town Councilor Deb Paul detailed in the complaint filed on April, 30, May 1 and May 8, 2025, regarding violations of the Town's Code of Ethics are (if Sustained {Public Censure or other action} or if Unfounded, this matter is now closed)

Attachments: 1. Investigative Report from the law firm of DTC. 2. <u>June 2, 2025 Code of Ethics & Town Charter Complaint | Londonderry, NH</u>



CELEBRATING OVER 30 YEARS OF SERVICE TO OUR CLIENTS

PLEASE RESPOND TO THE PORTSMOUTH OFFICE PRIVILEGED AND CONFIDENTIAL

Released for public distribution 8/11/25

VIA EMAIL ONLY Shaun Mulholland, Town Manager Town of Londonderry 268B Mammoth Road Londonderry, NH 03053

August 11, 2025

Re: Farrell, John – Ethics Complaint Against Debra Paul Opinion and Review of Complaint

Dear Mr. Mulholland:

The purpose of this letter is to provide a report on the three (3) ethics complaints filed by John Farrell ("Farrell") against Town Councilor Debra Paul ("Paul"), dated April 30, 2025, May 1, 2025, and May 8, 2025. I was retained by you, in your capacity as Town Manager, on June 6, 2025 to provide a review and assessment of the ethics complaints under the provisions of the Town of Londonderry Town Charter and New Hampshire Law.

I. Allegations

The allegations can be condensed to the following allegations:

- 1. The April 30, 2025 Complaint is attached hereto as **Exhibit A**. It asserts that:
 - a. Paul engaged in "abhorrent and abusive" behavior of an employee, Doug Cole ("Cole") during meeting of the Londonderry Recreation Commission ("Recreation Commission").¹
 - b. Paul violated Section 4.8 of the Town Charter related to "non-interference" in her interaction with Cole at the April 15, 2025 meeting.
 - c. Paul violated Section 6.2(b) of the Town Charter because she was "financially interested" in a matter being discussed during the April 15, 2025 meeting of the Recreation Commission.

DONAHUE, TUCKER & CIANDELLA, PLLC
16 Acadia Lane, P.O. Box 630, Exeter, NH 03833
111 Maplewood Avenue, Suite D, Portsmouth, NH 03801
Towle House, Unit 2, 164 NH Route 25, Meredith, NH 03253
83 Clinton Street, Concord, NH 03301

¹ The Complaint identifies that the meeting occurred on April 25, 2025; however, the meeting actually appears to have occurred on April 15, 2025.

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- d. Paul violated Section 6.7 of the Town Charter by using the "influence of the newspaper for . . . personal gain" during the April 15, 2025 meeting of the Recreation Commission.
- e. Paul violated Section 8.12 of the Town Charter by directing abusive behavior toward Cole during the April 15, 2025 meeting of the Recreation Commission.
- f. Farrell questions whether Paul's involvement on the Town Council is permissible due to "Lyme rage."

2. The May 1, 2025 Complaint is attached hereto as **Exhibit B**. It asserts that:

- a. Paul violated Section 4.8 of the Town Charter related to her involvement "as a Councilor when she is the Publisher/Editor of the newspaper." This includes calling Town Staff and stating that she is calling for the newspaper, controlling assignments to meet "her personal narrative," interfering with the Planning Department and Planning Board during an April 9, 2025 meeting and suggesting that a land use applicant needs to "Pay to Play."
- b. Paul violated Section 6.2 when, during an April 21, 2025 meeting of the Town Council, she sought to "influence the Decision by the Town Treasurer on the Selection of Banking Partner for over 100 million in revenue."
- c. Paul violated Section 6.2 by failing to make disclosures on matters involving personal gain, including decisions on the Town's banking partner and use of newspaper advertisements.
- d. Paul violated Section 6.7 by "promoting the use of the local newspaper."
- e. Farrell repeats his concerns about Paul's involvement on the Town Council due to "Lyme rage."
- f. Paul violated Section 8.12 of the Town Charter through "abuse of employees, idle threats to their positions, consent solicitation of the use of her newspaper business for personal gain."
- g. Paul engaged in perjury per a case captioned <u>Gannett Publishing v. Nutfield Publishing</u>, 218-2024-CV-00307. Later excerpts raise Paul's prior conviction for violating RSA 664:16 related to unlawful political advertising.

3. The May 8, 2025 Complaint is attached hereto as **Exhibit C**. It asserts that:

- a. Paul engaged in "abhorrent and abusive" behavior of an employee, Kellie Caron ("Caron") during meeting of the Town Council.²
- b. Paul violated Section 4.8 of the Town Charter related to "non-interference."
- c. Paul violated Section 6.7 of the Town Charter by using the "influence of the newspaper for . . . personal gain," knowing about "new projects," and using "her newspaper to create [an] atmosphere of intimidation, bullying, and threats."

² The Complaint identifies that the meeting occurred on May 4, 2025; however, the meeting actually appears to have occurred on May 5, 2025.

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- d. Paul violated Section 8.12 of the Town Charter by directing abusive behavior toward Caron.
- e. Farrell repeats his concerns about Paul's involvement on the Town Council due to "Lyme rage."

II. <u>Executive Summary</u>

Upon investigation, my recommended findings are as follows:

- **Allegation**: Paul engaged in "abhorrent and abusive" behavior toward Cole during the April 25, 2025 meeting of the Recreation Commission.
 - o Finding: Unfounded.
- Allegation: Paul violated Section 4.8 of the Town Charter related to "non-interference" by seeking to have Cole and the Recreation Department notify the Londonderry Times regarding recreation activities.
 - o Finding: Unfounded.
- **Allegation**: Paul violated Section 6.2 of the Town Charter because she was "financially interested" in the matter being discussed during the April 25, 2025 meeting of the Recreation Commission.
 - o Finding: Not Sustained.
- **Allegation**: Paul violated Section 6.7 of the Town Charter by using the "influence of the newspaper for . . . personal gain."
 - o Finding: Not Sustained.
- **Allegation**: Paul violated Section 8.12 of the Town Charter by directing abusive behavior toward an employee.
 - o Finding: Unfounded.
- **Allegation**: Paul engaged in "abhorrent and abusive" behavior of an employee, Kellie Caron ("Caron") during the May 4, 2025 meeting of the Town Council.
 - o Finding: Unfounded.
- Allegation: Paul violated Section 4.8 of the Town Charter related to "non-interference" with regard to her interaction with Caron during the May 4, 2025 Town Council Meeting related to revisions to the Planned Unit Development provisions of the Town's Zoning Ordinance ("PUD Ordinance").
 - o Finding: Unfounded.
- **Allegation:** Paul violated Section 6.7 of the Town Charter by using the "influence of the newspaper for . . . personal gain," knowing about "new projects," and "uses her newspaper to create [an] atmosphere of intimidation, bullying, and threats."
 - o Finding: Not Sustained.
- **Allegation:** Paul violated Section 8.12 of the Town Charter by directing abusive behavior toward an employee.
 - o Finding: Unfounded.

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- Allegation: Paul should be required to indemnify the Town of Londonderry due to Paul having "Lyme Rage" and/or "Syphilis of the Brain."
 - o Finding: Not Sustained/Inconclusive.
- Allegation: Paul violated Section 4.8 of the Town Charter related to her involvement "as a Councilor when she is the Publisher/Editor of the newspaper." This includes calling Town Staff and stating that she is calling for the newspaper, controlling assignments to meet "her personal narrative," interfering with the Planning Department and Planning Board during an April 9, 2025 meeting and suggesting that a land use applicant needs to "Pay to Play."
 - o Finding: Not Sustained.
- Allegation: Paul violated Section 6.2 when, during an April 21, 2025 meeting of the Town Council, she sought to "influence the Decision by the Town Treasurer on the Selection of Banking Partner for over 100 million in revenue."
 - o Finding: Not Sustained.
- **Allegation:** Paul violated Section 6.2 by failing to make disclosures on matters involving personal gain, including decisions on the Town's banking partner and use of newspaper advertisements.
 - o Finding: Not Sustained.
- **Allegation:** Paul violated Section 6.7 by "promoting the use of the local newspaper."
 - Finding: Not Sustained.
- Allegation: Paul violated Section 8.12 of the Town Charter through "abuse of employees, idle threats to their positions, consent solicitation of the use of her newspaper business for personal gain."
 - o Finding: Not Sustained.
- Allegation: Paul engaged in perjury per a case captioned <u>Gannett Publishing v.</u> <u>Nutfield Publishing</u>, 218-2024-CV-00307. Later excerpts raise Paul's prior conviction for violating RSA ____:__ related to political advertising.
 - o Finding: Outside the Scope of the Investigation.

III. Factual Background and Investigation Process

Paul is the owner of Nutfield Publishing, which is the parent company of the Londonderry Times and the Hudson Times. Nutfield Publishing also owned the Nutfield Times and the Tri-Town Times, although, per Paul both of those publications are now only offered through a maintained Facebook page.

Paul has lived in the Town for approximately 30 years. In that time, Paul has served on the Heritage Commission, the Old Home Day Committee, the Master Plan Committee, and Beautify Londonderry. In 2020, Paul was elected to the Town Council. During that time, Paul served as an ex-officio member of the Planning Board for the Town Council.

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Farrell was also on the Town Council during Paul's first tenure on the Town Council. Farrell acted as Chair. It appears from discussions with various parties that Paul and Farrell had a contentious relationship, although who mistreated who appears to be a matter of dispute. Certain individuals have reported that Farrell acted professionally, while Paul did not reflect the same degree of professionalism. Paul asserts that she was the target of bullying by other members of the Council.

Paul did not run for re-election in 2024. Paul ran for Town Councilor again in 2025 and was successful. In that election, Farrell was not re-elected to the Town Council.

Summary of Recreation Commission Meeting Interaction

The meeting video from the April 14, 2025 meeting of the Recreation Commission is available online on the Town's Government Access Page on Youtube. The meeting minutes, however, are not posted on the Town's webpage. In attendance were Cole, Paul, Recreation Director Art Psaledas, and Recreation Commission Members Roberta Davis, Kevin Foley, Patrice Ruff-Burbine, and Kristina Ciarametaro.

The video speaks for itself, but the interaction that is the subject of this investigation begins at 24 minutes, 50 seconds in the video. The interaction starts with Paul stating: "Can I ask you a really stupid question as I'm sitting here going, why don't you ever contact the newspaper about any of this stuff. Ever." Cole responds that information is posted. Paul continues, "I'm listening to all this stuff and they only way we find out about stuff is if occasionally we see something on Facebook or if someone else tells us, but you never, ever, ever, reach out to us to cover this stuff."

The discussion then proceeds to include the other attendees. Paul's statements during the meeting include questioning why Cole has a "phobia" to the newspaper that's delivered to the Town. Paul states during the exchange that she runs 4 newspapers that cover 5 towns and that "all [she asks] is that you send in the information." She further states that "when you're going to get money to get voted on . . . [it is] easy when people know about it."

Summary of Town Council Meeting Interaction

The meeting video from the May 5, 2025 Town Council meeting is available online on the Town's Government Access Page on Youtube. The video speaks for itself, but the interaction that is the subject of this investigation begins at 2 hours, 55 minutes in the video.

The video reflects that Paul wanted to bring the topic of the PUD Ordinance to the Town Council because "there are a lot of weak spots in it." Paul wanted to discuss taking the PUD Ordinance "temporarily off the shelf" and "re-do" and "fix" the Ordinance, so that it "is all on the side of the Town." Paul stated that she wanted to take the PUD Ordinance "off the shelf" because,

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if there were developers wishing to use the PUD Ordinance now, it leaves the Town open to the continued used of the PUD Ordinance. Paul stated that she was in a "little bit of a rush" because she was aware of 2 or 3 developments that could bring in 2 or 3 more PUDs.

Vice Chair Faber stated that the Council could not discuss any planned PUDs "in process, right now" and that the Planning Board's preference was for the Council to "follow the process." At that point, Councilor Combes inquired of Caron of the number of acres needed for a PUD. Caron responded 100 contiguous acres. Councilor Combes expressed that, given the need for 100 contiguous acres for a PUD, he questioned the likelihood of such a development arising. Paul responded that a developer could buy multiples parcels to meet the 100-acre requirement.

Councilor Combes then asked if Paul wanted to sidestep the PUDs already in place, to which Paul responded that the Town could not do so, stating "you know that Ted" and "that's not what I said." Councilor Combes stated, "that's how it sounded," to which Paul said, "I'm sorry you didn't hear me correctly," and reiterated her prior comment about developers aggregating parcels.

Vice Chair Faber asked Paul to identify what was wrong with the PUD Ordinance. Paul responded that the PUD Ordinance had demonstrated itself insufficient "time and time again" and "failed us as a community." Paul said that she did not have specifics with her but was concerned that if someone was looking to purchase a large piece of property "over in the Auburn area" that was "concerning to [Paul]." At this point, Caron stated that she was "going to address that right now because [she didn't] want to get things confused." Caron stated that the project had submitted "conceptual review" and was "in the queue" and from "a legal standpoint [the Town] would be required to follow the current ordinance." Caron responded that it became so at a conceptual meeting of the Planning Board on January 8, 2025. Caron proceeds to state that "we've consulted legal to confirm that that is correct." Caron then explained the process for the removal of the PUD Ordinance and if someone chooses to submit prior, the Town would be required to follow the Ordinance.

Paul responded that she was "just a little bit disappointed" because "we had a meeting on the 8th" and Caron did not tell her when she brought it up. Caron responded, "it was publicly noticed," to which Paul says, "but when we were discussing it, you did not mention it." Paul then says that she's just "very disappointed" and "that's all [she was] going to say Kellie." Caron states, "well I'm going to respond," to which Paul says, "good you can, but you should have told me."

Caron stated that, "we discussed the PUD" and told Paul that she was going to pose the question about "where it stood from a legal standpoint," which she states she did in consultation with legal counsel. Paul then states, "then this conversation wouldn't have been happening if you had said that, at that private meeting but you chose not to." Caron responds, "I didn't realize your intent was to get ahead of that development." Paul, "I said it at the meeting Kell."

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After this exchange the Council discussed strategies related to the PUD Ordinance at length. At one point in this later discussion, Paul states that the Town is not following the PUD Ordinance, questioning why the Technology Hill Development does not have a "development agreement." Caron responded that the Zoning Ordinance does not require a "development agreement," to which Paul disagreed. Caron stated, even assuming that Caron was mistaken, it would be legal "dangerous" to say that the Town is not following its regulations.

Interview with John Farrell

I interviewed the Complainant John Farrell on June 26, 2025 at my Exeter Office. Farrell was not represented by counsel and attended the interview himself. The interview was recorded. Farell reported that he has no issues impacting his memory and was under no medications which may impact his ability to recall information. Farrell reported that, prior to the meeting, he reviewed the three subject complaints and other supporting materials, as well as his scratch notes.

Farrell has lived in the Town for over 30 years. During that time, Farrell served 5 consecutive 3-year terms on the Town Council, until he lost his bid for re-election in 2025. Farrell stated that he has no relationship with Paul. Farrell stated that Paul ran against him in 2019, and lost, then obtained a seat on the Town Council in 2020 and served until 2023, deciding not to run again in 2024. Farrell stated that Paul and "another newcomer" beat him in 2025.

I asked Farrell if any of the stories that were run in the Londonderry Times were harmful to his candidacy. Farrell responded that I should review the John Seidenberg emails appended to his complaint. Those emails are included in **Exhibit E** and date to 2021. Mr. Seidenberg is a former employee of the Londonderry Times, and the emails reflect Mr. Seidenberg's statements that Paul exercises considerable control over the Londonderry Times. Farrell characterized the Londonderry Times as a "[p]olitical propaganda piece of Ms. Paul directed by her to enhance her campaign." Farrell stated that Mr. Seidenberg "knows nothing about this" and that Farrell has not spoken with Mr. Seidenberg in a couple of years. Farrell expressed that the Londonderry Times is used to communicate Paul's "narrative and agenda" as to what Paul believes should be "the development and functioning of Town Government." Farrell characterized Paul as being "anti-development."

I responded to Farrell questioning whether having such a position was unlawful. Farrell responded that Paul has "every right to run," but if Paul is going to sit on the Town Council, she needs to follow the law." Farrell stated that the only person quoted in every story in the Londonderry Times is Paul.

I inquired if this matter was any different than someone having a blogger seeking public office. Farrell suggested that I review the presentation from prior Town Counsel Mike Ramsdell, also appended to **Exhibit E**.

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I asked Farrell how the operation of the newspaper violated the Town Charter. Farrell responded that he didn't say that it violated the Town Charter," it violates journalism ethics." Farrell stated that the statements in the newspaper reflect that Paul had "[p]re-conceived, biased opinion[s] when voting that [Paul has] demonstrated over a period of years." Farrell stated that as a Town Councilor you "have to take all the facts and make a decision."

Farrell discussed that Paul operates her newspaper in a way where third parties have to pay for advertising if you want a positive story. He referenced a Mike Kettenbach, related to the Woodmont PUD, and Turcotte Tree Service. I asked Farrell if he was aware of Paul leveraging her position in Town government to compel advertising patronage. Farrell responded, "not at all," but that Paul uses her newspaper to exert influence. Farrell stated that it "may not violate the Charter," but its "not a great way to do business."

I brought up Farrell's allegations that Paul suffers from "Lyme Rage" and "Syphilis of the Brain." Farrell said that his research shows that Lyme Disease can lead to memory loss and early dementia and that she has exhibited potential cognitive impairment through the demonstration of rage in public meetings.

I asked Farrell about the allegation that Paul said to a developer that the developer needed to "pay to play." This statement was made on April 9, 2025 during a discussion of the Zalinsky/Auburn Road PUD. Farrell said that such a position was inappropriate because she is the alternate ex officio to the Planning Board. Farrell asserted that Paul spoke from the audience that the developer needed to "give us more" and "do more for the Town." I confirmed that Paul was sitting in the audience during this discussion. Farrell confirmed his understanding that she was. I inquired of Farrell as to whether Paul was speaking as an individual or in her capacity as a Town Council. Farrell did not know how Paul introduced herself but asserted that if a person is elected to be a Town Council, that person cannot get up and say that you're not acting as a Town Councilor. Farrell asserted that Paul was asserting improper influence through her newspaper and that she should not participate. Farrell went on to say, however, that he is not asking her to resign for those reasons, he is asking Paul to resign due to Paul's "Lyme Rage." Per Farrell, "did she violate other parts of the charter? I don't think so."

I began discussing Farrell's complaint regarding the conduct during the April 14, 2025 Recreation Commission Meeting. We recapped the nature of the allegations, although the video was available to play if Farrell had any issues recalling the substance of the meeting. Farrell believed that the discussions between Paul and Cole were inappropriate and "should have been taken offline." Farrell stated that Paul's questions were an "interrogation." After the meeting, Farrell asserted that Recreation Director Art Psaledas called him to discuss the meeting, not in an official way but to "air the grievance." While Farrell said that Paul allegedly apologized after and attributed the incident to "Lyme Rage," Farrell stated that if you "can't control yourself, [you] shouldn't be there."

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I went through the various violations of the Town Charter alleged to have arisen from the April 14, 2025 Recreation Commission Meeting. We discussed Section 4.6, where Farrell stated that Paragraph II was violated because there was "definitely interference there." Farrell claimed that if Paul disagreed with what transpired, she should have gone to the Town Manager to discuss. I asked Farrell what was inappropriate with Paul asking a question during the Recreation Commission meeting about why Recreation event were not being publicized. Farrell stated that Paul "belittled [Cole]." I asked Paul what was belittling. Farrell responded Paul's "body language, the way she's interacting, what she's saying, and also know the history." Farrell stated that Paul should apologize to Cole.

I asked Farrell to explain his position that Section 6.2 was violated. Farrell stated that in running those stories, Paul will improve circulation, sell more ads, and make more money. We discussed the wording of Section 6.2 which precludes voting on an action under deliberation without disclosing a potential conflict of interest. I asked Farrell if there was anyone that was not aware of Paul's involvement in the Londonderry Times and whether her comments pertained to a matter to be voted on during the April 14, 2025 meeting.

Regarding Section 6.7, misuse of information, Farrell alleged that Paul has gained "information that [a person] would normally not have access to." I inquired of Farrell how this applied to the Recreation Commission where members acknowledged that the events that were the subject of the comments were publicly noticed. Farrell indicated that the issue was broader and that there was nothing that he could prove but that he suspected. When asked for an example, Farrell raised the disclosure of his ethics complaints and that, when the Town Council initially discussed the matter on June 2, the Council chambers were filled with Paul's supporters. I inquired whether such a matter was, at that point in time, politics. Farrell inquired whether the average lay person would have access to that, but when asked, Farrell was unaware as to whether Paul was directed to not disclose the complaint.

Turning to Farrell's allegation that Paul violated Section 8.2(c), Farrell admitted the allegation "may be a stretch," but that by Paul's behavior, the employee may feel the need to appease her (through providing stories to the Londonderry Times) to Paul's ultimate financial benefit.

We next discussed Farrell's complaint about Paul arising from the May 5, 2025 Town Council Meeting. Farrell stated that he did not think that a member of the Town Council should be treating a member of the "senior staff in that manner." Farrell stated that Paul should be reprimanded over the incident. Farrell indicated that he spoke with Caron about the incident. Farrell stated that the discussion was likely a side topic to another conversation, particularly where Farrell is building an accessory dwelling unit on his home. Farrell's ability to recall the discussion with Caron was that Caron "didn't like" the interaction but did not go further.

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Turning to the specific alleged violations of the Town Charter arising from this incident, I asked Farrell how the interaction violated Section 4.8(c). Farrell agreed that the Zoning Ordinance authorizes the Town Council to initiate changes to the Zoning Ordinance and Paul's discussion was initiating that conversation. However, Farrell took issue with how Paul raised the issue stating that you "don't talk to your staff that way."

Farrell expressed concern that, given Paul's inability to control herself, he is concerned with the Town's obligation to indemnify her. I asked Farrell if he believed that Paul's conduct was legally actionable. Farrell responded that the singular incident may not be but that it was symptomatic of a problem. Farrell reiterated that Paul should "indemnify the Town." He expressed that when he was on the Town Council with Paul, Paul would regularly attribute conduct to "Lyme Rage" and that Paul would say that she "can't control it."

The discussion then went back to the issue of Paul's stance expressed in the Londonderry Times. Farrell stated that Paul controls narrative of "anti-development." "You can be anti-development." You can't use that information that you get in advance for your newspaper." I asked Farrell to explain that statement. Farrell explained that Paul was the ex-officio and is now the alternate ex-officio member to the Planning Board and receives access to information prior to the public. I asked Farrell if he had specific examples of Paul misusing that information. Farrell stated that you "have to live in Town to know" and suggested that I speak with Caron.

I asked whether Paul's stories were really more of an issue of "journalistic integrity." Farrell stated it is a morality issue and an ethical issue. I asked Farrell "whose ethics?" Farrell replied, "Don't know, when the Town is sued we'll find out." Farrell stated, "[i]ndemnify the Town from all your actions. If you're going to act in the way you're going to act . . . take responsibility for your actions."

When I asked Farrell whether he had any statements related to his allegations of violations of Section 8.12 and 8.11, Farrell recommended that I talk to Caron.

Turning to Farrell's April 30, 2025 complaint (**Exhibit B**), I asked Farrell to comment on what he was seeking, as much of the complaint seemed to focus on Paul's actions as a private citizen. Farrell responded that the incidents show a "pattern of behavior" and reflect that Paul should sign an indemnification agreement.

I specifically asked about the allegations in the April 30, 2025 complaint related to Enterprise Bank. Farrell responded that on April 21, 2025, there was a discussion as to the Town's change of banks from Citizens to TD Bank. Farrell reports that Paul raised multiple questions as to why Enterprise Bank was not considered, notwithstanding Farrell's report that Enterprise Bank advertises with the Londonderry Times. Farell acknowledged that Paul recuses herself whenever certain junkyards come before the Town Council because those junkyards advertise with the Londonderry Times.

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Farrell reported his concern of "what if [a third party] didn't take an ad and then the person comes before" the Council. Farrell stated that businesses in Town understand that if they want favorable coverage, they need to take out an ad. I asked Farrell if he was aware of whether Paul leveraged her position as a Town Councilor in such a way. Farrell could not confirm such an incident occurred.

Farrell focused on concerns related to Paul's integrity, stating that John Seidenberg says that Paul has full concern over the newspaper and "shows you the individual you're dealing with." Farrell reiterated his concern that she uses the Londonderry Times for her own purposes stating that one of her reporters, Alex Molm "will be contacted by Paul, will interview her, and then write[] the story." Farrell concluded that "she uses [the Londonderry Times] as a propaganda piece for what she believes should be the story of the community."

Toward the end of the interview, Farrell articulated that others in Town had previously expressed concern over Paul's relationship with the Londonderry Times, including former Town Manager Kevin Smith, noting that prior Town counsel, Mike Ramsdell provided a presentation regarding concerns about operating a newspaper while on the Town Council. Farrell further expressed his concern about Paul's counsel, Kevin Coyle, noting that Farrell had "signed the termination paperwork" for Attorney Coyle.

Farell concluded stating that he does not "really care about Ms. Paul. Don't really care about her newspaper." When I asked Farrell about Farrell's history with Paul, he stated that he was raised to treat women with respect and that Paul "got treated with more respect than she received in her life when I was on the Town Council with her." Farrell reiterated, "indemnify the Town and I'm all set."

Interview of Cole

On July 2, 2025, I interviewed Cole. The interview was conducted digitally. I was unable to record the interview due to fact that a technical difficulty required me to use my phone to call in, and, consequently, I lacked the access credentials to use the recording functions.

I started the interview by asking Cole what his relationship is with Paul. Cole expressed that he has had little interaction with Paul. He has had limited opportunity to speak with her and has not conversed with her outside of a formal meeting.

I asked Cole about the April 14, 2025 Recreation Commission Meeting. I asked Cole how he interpreted the meeting. Cole interpreted Paul's comment as Paul runs a local newspaper and she could put more information into the public about the Recreation Department using her newspaper. Cole stated that the Recreation Department does not presently do so and would wait to get contacted. He interpreted Paul as saying that the newspaper could help programs or events.

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I asked Cole what his perception was of Paul's comments. Cole stated that the comment took him "off guard" and that he tried to answer the questions but that Paul "wouldn't stop the barrage of things being said." Cole stated that he eventually stopped talking because he "didn't want to fire off." Cole believed that the discussion "escalated beyond" what it should.

I asked Cole if he believed that Paul crossed any lines with regard to the April 14, 2025 meeting. Cole responded that the interaction took a meeting that was at a high point and brought it down quickly, but Cole responded that such things "do happen" and that you have to have "thick skin." Cole stated that he "was not bothered in the sense of personally," but the interaction should not have happened.

Cole stated that the April 14, 2025 Recreation Commission meeting was the first meeting Paul sat as the liaison to the Town Council on the Recreation Commission. Cole stated that Paul attended the May meeting and there were no issues whatsoever and Paul acted more in the "liaison" role. Cole stated that neither he nor Paul attended the June meeting.

At the conclusion of the interview, Cole said he is "thick-skinned" but the interaction became personal. He would have wanted the tone and manner the question was asked be different. Cole, however, stated that he did not make a complaint to the Town's Human Resources Department, nor is he aware of anyone else making such a complaint.

Interview of Caron

On July 18, 2025, I interviewed Caron. The interview was conducted digitally. I was unable to record the interview due to the aforementioned technical difficulty, which required me to use my phone to conduct the interview. Consequently, I lacked the access credentials to use the recording functions.

Caron reported that she has been with Londonderry for 3 years. She is presently the Assistant Town Manager and Director of Economic Development. She was initially hired as the Town Planner. I asked Caron what her relationship is with Paul. Caron stated that Paul was a sitting counselor at the time of Caron's hire and that Paul approved the Town's nomination to hire her. Prior to working in Londonderry, Caron worked for the Towns of Epping, Merrimac, Milford, the State of New Hampshire, and the Rockingham County Regional Planning Commission.

Caron stated that her interactions with Paul are usually through the Town Council and Paul's role on the Planning Board. Caron stated that, usually, her interactions with Paul outside of a meeting are either before or after a meeting. However, Caron acknowledged that there are instances where Caron has met with Paul in meetings with the Town Manager and other councilors, although such instances are not common. Caron stated that such meetings are usually in her capacity as Director of Economic Development.

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I asked Caron if she was aware of instances in which Paul sought to extract a personal benefit from developers. Caron stated that she's heard accusations but could not provide specifics other than rumors.

I asked Caron if she had ever heard Paul refer to herself as having "Lyme Rage." Caron stated that, to the best of her recollection, Paul had some issues with the brain, but Paul was taking care of it. Caron articulated her understanding that sometimes Paul did not feel well. Caron did not have any concerns as to Paul's cognitive capabilities, memory, or ability to appropriately regulate emotions or behavior.

Caron explained that presently Paul is the alternate ex-officio member to the Planning Board, but when Paul was the ex-officio during her prior term with the Town Council. Caron explained that alternates are allowed to ask questions. She stated that the ex-officio, however, sits at the dais. Caron stated that Paul will participate in Planning Board meetings as a member of the public. Caron stated that, when Paul does, she identifies herself by name and address. Caron could not recall a time that Paul identified herself as acting as a Town Councilor or in any capacity other than her personal capacity. Caron believed that if Paul sought to invoke her status as a Town Councilor, she would remember it due to it being unique; Caron could not recall any such instance.

I asked Caron about the May 5, 2025 meeting. Caron stated that she will review meeting minutes as a general practice and rewatched the video from May 5, 2025 as part of her regular practice. Caron denied the characterization that the interaction on May 5, 2025 was "abhorrent or abusive." Caron stated that she disagreed with Paul and that the interaction "probably bordered on unprofessional, but not bullying or abusive." Caron stated that similar interactions are "fairly common," particularly with members of the general public.

I asked Caron about the meeting that supposedly took place with Paul prior to the May 5, 2025 meeting. Caron stated that the meeting took place with Acting Town Manager Kim Bernard ("Bernard") and Councilor Bouchard. The purpose of the meeting was to review several topics, including the PUD Ordinance. With regard to the PUD Ordinance, there were a total of 2 developments and 1 conceptual. The discussion included what actions the Town Council could do about the current development agreement with the Woodmont development agreement and the PUD Ordinance. Caron stated that Paul was seeking to rescind the PUD Ordinance and potentially renegotiate the terms of the Woodmont developer agreement. Caron stated that she told Paul that she would have to confer with the Town's legal counsel to see what the conceptual consultation meant from a review standard (to see if the project was vested against changes in the Zoning Ordinance). Caron stated that Paul was okay with Caron seeking additional information. Caron expressed her concern that, because the conceptual consultation was noticed, the Auburn Road development would be subject to the current iteration of the Zoning Ordinance. Caron stated that she communicated with the Town's legal counsel who confirmed Caron's understanding.

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I asked Caron if she believed Paul's position on PUD's was inappropriate. Caron said that Paul's position was not "uncommon."

I asked Caron if she discussed the matter with any third party after the May 5, 2025 meeting. Caron stated "not that I recall." Caron stated she has a standard debrief after meetings with Bernard. Caron stating that she would have highlighted the discussions during the meeting. I asked Caron what that meant with regard to the discussion of the PUD Ordinance. Caron responded stating that it would have been something along the lines of "[Paul] brought up the PUD Ordinance again, [Caron] confirmed with legal, and disagreed on the recap from the prior meeting." Caron stated that she did not spend a lot of time being bothered by things at public meetings.

I asked Caron if anyone approached her to discuss the May 5, 2025 interaction. She stated certain employees stated that they thought Caron did a great job and handled herself well. I asked if anyone mentioned their opinion that the interaction was inappropriate. Caron said no. I asked her if she was approached by any members of the public, to which Caron said "not that [she could recall]."

I next asked about Caron's relationship with Farrell. Caron stated that Farrell is a resident and she's the Assistant Town Manager. Caron stated that Farrell is friendly, but she has known Farrell since she started working in Londonderry. While Caron grew up in Londonderry, she only knew "of him." Caron described her interactions with Farrell as "pretty standard," but denied talking about Paul to Farrell. Caron said that Paul and Farrell likely disagreed more than the average town officials when they were both councilors. I asked how Paul and Farrell handled their disagreements. Caron responded that Farrell handled disagreements professionally, but Paul "not always." I asked Caron to explain her position. She stated that Paul is not always professional in terms of posture, eye rolling, and sighing. I asked if Paul used profane or inappropriate language, to which Caron said not to her knowledge. Caron also denied Paul using attacks or insults.

Lastly, I asked Caron about reporting in the Londonderry Times. Caron states that she has not been interviewed and is unaware of staff being interviewed. Caron stated that she has heard rumors of Paul misusing confidential information, but it was only rumors. Caron could not provide any specifics on that issue.

First Phone Call with Richard Flier

On July 7, 2025, Farrell informed me that a Richard Flier was going to try to contact me because Mr. Flier had interesting information pertaining to my investigation. I spoke with Mr. Flier on the phone on July 18, 2025. The interview was conducted on the telephone.

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Mr. Flier provided a general overview of his experience, which included acting as a president of the Visionary Institute, LLC, as well as engaging in development work throughout Massachusetts and New Hampshire.

Mr. Flier reported that he was Paul's landlord. Mr. Flier provided me a history of his relationship with Paul, which reportedly resulted in an eviction for non-payment of rent and other grievances related to Paul and Mr. Flier's relationship as landlord and tenant. Mr. Flier reported that he was threatened by Paul's husband and was harassed by people loyal to Paul. Mr. Flier also raised various issues related to Paul's operation of her newspaper. I informed Mr. Flier that my investigation would only pertain to matters related to Paul in her capacity as a Town Councilor.

Mr. Flier asserted that Paul is the leader of a group of 4-to-5 individuals, which includes Planning Board Member Ann Chiampa and an unidentified male from the United Kingdom. Mr. Flier stated that Paul will have this group of people show up to meetings to speak against various matters that Paul disagrees with. I asked Mr. Flier if he had any specific information related to Paul inappropriately providing information to such individuals; however, Mr. Flier could not provide specific examples. Mr. Flier recommended that I speak to Farrell, Bernard, and Mike Kettenbach.

During the discussion, Mr. Flier alluded to his belief that he has been subject to antisemitism. Mr. Flier informed me that he is Jewish and that he has a current project ongoing in the Town of Londonderry. I asked Mr. Flier how, and he stated that a Town body that he had to appear before intentionally chose a meeting time on a Friday after the start of the Jewish Sabbath to keep Mr. Flier from attending. [NOTE: Upon inquiry, I have been unable to find any Town boards or commissions that met during a Friday in the recent past. I believe Mr. Flier was referencing the Londonderry Historical Society, which is a separate legal entity and not within the scope of this investigation.]

Mr. Flier expressed considerable concern for Paul's character and what she is doing from her position on the Town Council.

Interview with Deb Paul

On July 25, 2025, I interviewed Paul at my Portsmouth Office. In attendance was Kevin Coyle, counsel for Paul. The interview was audio recorded. Certain topics of discussion have been reorganized for ease of presentation; however, the substance of the discussion has not changed.

At the start of the interview, I explained the nature of the investigation and my charge. Attorney Coyle explained that there was a fourth complaint, which was supposedly investigated

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by the County Attorney's office related to the execution of certain documents in the <u>Nutfield Publishing</u> civil action. I responded that the fourth complaint was not included in my charge.

Attorney Coyle made an opening remark stating that Farrell was a "disgruntled official who lost" to Paul. I stated Attorney Coyle's would be noted for the record but asked him to allow Paul to answer the questions. Attorney Coyle acknowledged that Paul would answer the questions that I asked.

I started the discussion by asking Paul preliminary questions. Paul stated that she had no physical or mental condition impacting her ability to recall information and was not taking any medications.

Paul provided me with an overview of the Town positions she had held historically. Paul served on the Heritage Committee for approximately 3 years, starting in or around 2017, on the Master Plan Committee in 2013, on the Old Home Day Committee between 2004 to 2009 (and then thereafter as a non-member volunteer), and Beautify Londonderry. Later during the interview, Paul also stated that she is the ex-officio member on the Capital Improvement Plan. Paul stated that she was previously the ex-officio member of the Planning Board and is the current alternate ex-officio to the Planning Board. In her capacity as alternate ex-officio member, Paul states that she usually stays at home unless the current ex-officio Town Councilor says that he will not attend; however, Paul still receives the agenda and member packets for Planning Board meetings.

With regard to the Town Council, I asked Paul about whether she received any training when she first went on to the Town Council. Paul stated that in 2020, she had an "orientation" where she attended with the other members of the Council and the Town attorney. Paul alleges that she was encouraged not to speak or engage during meetings. Paul stated that she "declined that suggestion." Paul stated that the meeting was focused on her participation during meetings, as opposed to her role on the newspaper. Paul then was told that she received the "Rules of the Town Council."

During her first tenure as a Town Councilor, Paul claimed that Farrell was the Chair and refused to recognize her to speak because "she owned a newspaper." Paul stated that this treatment led to Paul to go to the Institute of Free Speech to get involved. [Note: a review of the Institute for Free Speech's website confirmed that a letter was sent by the Institute for Free Speech to Farrell and the prior Town Council regarding allegations that she was told that it was "not proper for her 'to be expressing her opinions about a town issue' in either 'social media or legal newspapers." A copy of that letter is attached hereto as **Exhibit F**.] Paul reported that, although new Councilors

³ Upon inquiry, I have been unable to find the "Rules of the Town Council" and conversations with Mr. Mulholland did not result in those records being found. I assume that the "Rules of the Town Council" referenced by Paul was the Town's Code of Ethics.

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were elected in 2021 and 2022, there was no similar orientation or suggestion made to those new members. Paul further stated that she was subject to "vicious attacks and bullying" from the prior Vice Chair Jake Butler, which Farrell "allowed."

I asked Paul if she read the Town Charter. Paul stated that she read the Town Charter and understood it but could not recite it from memory. She reported that she reviewed the Town Charter a couple of months ago for a purpose unrelated to this investigation.

I asked Paul about the allegation regarding her ownership of the newspaper and her role as a Town Councilor. Paul stated that her ownership is "[n]ot really a conflict of interest" because she "personally [doesn't] benefit from it." "I'm putting information in the paper so people can know what to do."

Paul states that she operates 2 newspapers, the Londonderry Times and the Hudson Times. She previously also operated the Nutfield News and the Tri-Town times, but the paper publication ended in 2022 (Paul stated that she continues the Nutfield News and the Tri-Town Times through operating her Facebook Page). Each publication is a separate LLC, the parent of which is Nutfield Publishing. All publications are for-profit entities. Paul reports that she is the sole member of Nutfield Publishing and that Nutfield Publishing is the sole member of the individual publications. The Londonderry Times is a free, weekly paper that is mailed. The sole source of revenue for the Londonderry Times is advertising.

Paul reported that she is not a reporter and has no journalism background. Paul got involved in the newspaper because she is "passionate about the community," stating that she decided to start the papers due to the Granite Ridge Power Plant getting approved. Paul stated that the paper's mission statement is to "educate, engage, and inform the community."

Paul stated that, at present, she does not write stories, only "editorials," which she states is her "right to do." Paul stated that all reporters are freelance, which she reported is standard in the current industry. She stated that the reporters that she uses are not employees and that she cannot "tell them what to write." Paul will only "buy stories" that cover "Town Matters." She stated that the freelance reporters will monitor Town social media and review videos of meetings and will write stories. I asked Paul what would happen if the reporters took a position that she did not agree with? Paul was adamant she is unable to tell reporters what to write given their role as independent contractors. Paul denied feeding the freelance writers leads or telling them what to write, stating "I'd get in trouble, because not they're not my employees."

Paul stated that her husband also assists in the Londonderry Times, doing all "layout and design." Paul stated that he also writes sports and may write on a topic if it was a subject matter that the reporters "could not write about." Paul denied disclosing information that she learned in her capacity as a Town Councilor to her husband or reporters. She denied ever trying to order an employee to cooperate with the newspaper.

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When asked if Paul ever encouraged employees to cooperate with the newspaper, Paul raised the April 14, 2025 meeting of the Recreation Commission. Paul stated that she heard at that meeting that the Recreation Department was doing "great stuff." Paul stated that it costs her money to run stories from the Town about Town events. Paul stated that, by the time she receives information about an event at the Town, an edition of the newspaper is already laid out and the stories purchased from the freelancers. To run the story provided by the Town, she has to forego using the purchased story, and she "eats that loss." Paul stated that she never charges the Town to run a story but has charged the Town to run advertisements or classified ads. Paul stated that she has encouraged, but never ordered, a Town employee to provide information to the Londonderry Times.

I asked Paul if she was familiar with principles of recusal. Paul stated that she was. Paul reported that when a company does business with her, she will recuse from discussions on the matter. Paul referenced that when she was on the Town Council in 2022-2023, Barkman Towing came before the Planning Board, but the business had run a classified ad in the Londonderry Times 6 months prior. Paul reported that she disclosed the matter and recused herself. Paul also reported that when Farrell was being appointed to Deputy Treasurer, Paul recused herself because of the complaints made by Farrell.

I asked Paul what she does when she recuses herself. Paul stated that she will step down from the table and sit in the audience. Paul stated that she did the same when Murray's Junkyard needed to get a junkyard license.

I asked Paul about the allegations related to Enterprise Bank. Paul reported that, at the time, Enterprise Bank had not advertised in the Londonderry Times for almost two years. I asked Paul what her standard was for when enough time passed. Paul informed me that she gives it a year. "If actively in the paper, coming in and out, that to [Paul] is what you would do, and [Paul] give[s] it a year."

I asked Paul how advertising works. She responded that individuals will either advertise on an issue basis or over a period of time. Paul reported that if someone wanted to come in for a single issue in a week, Paul's recusal period starts from that date. If the ad appears weekly, Paul would always recuse. Paul stated that the one-year period is self-imposed and that she did not consult with any third party as to that recusal standard. Per Paul, it's her newspaper, so she "sets the standards."

I asked Paul about the allegations related to her mental capacity, specifically the references to "Lyme Rage." Paul stated that she discovered that she had been living with Lyme Disease for 16 years prior to its discovery and by that time it had mutated into a variety of other maladies. She reported that she experienced various symptoms from "foggy brain" to "shakes and tremors," but went on heavy anti-biotics. The end results left Paul with what is referred to as "Lyme Rage,"

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where she will get emotionally stressed and have difficulty controlling it. She said that she is working with doctors to control it, but she gets emotional. Paul stated that she is "not a threat," and that it is no different from a variety of other ailments that others can have that make someone more emotional. Paul stated that she has "pretty much plateaued."

I next asked Paul if she ever alluded to herself as having "syphilis of the brain." She stated that she has had a lot of co-infections due to the long-standing, untreated Lyme Disease, one of which starts with an "s", but it is not syphilis. Paul stated that she has challenges regulating response, but no concerns as to cognitive capabilities. She has not been diagnosed with a cognitive disorder, has not been adjudicated incompetent to handle her affairs, and has not had a guardianship or conservatorship imposed.

I asked Paul about the April 14, 2025 meeting of the Recreation Commission. Paul stated that she "[p]ersonally did not think it was a big deal." Paul stated that she was at the Recreation Commission meeting as a liaison for the Town Council. We proceeded to watch the video from the meeting at the point of the discussion that was the subject of Farrell's complaint. During the beginning of the video, Paul asked me to stop the video to state that Paul did not want to hire Cole and that Cole knew Paul did not want to hire him as he was at the meeting where his candidacy was being discussed. I asked Paul the importance of this fact, and Paul responded that she is "not in his head," but went on to state that maybe Cole is upset with her. I responded that Cole did not submit the complaint. Paul questioned how Farrell knew about this one exchange from one Recreation Commission meeting. Paul stated that she believes someone fed the issue to Farrell. I asked Paul who she believes reported the issue to Farrell. Paul refused to say, stating that she only has a suspicion and that you "gotta have a receipt to say something." We continued to watch the video.

At the conclusion of the video, I asked Paul if there was anything that she would have done differently about the interaction. Paul stated, that she "probably could have been calmer," but her beliefs and her beliefs and their beliefs are their beliefs. Paul stated that she believes in "healthy discussion" and expressed that the interaction constituted "healthy discussion."

I asked Paul if she had ever had training in human resources. Paul responded that she was "not allowed to talk to anyone." I asked if she had prior training in human resources in her private business, to which Paul responded that such training was "old." Paul stated: "You may not like [her] as a boss. You may not like [her] tone. You may like [her] mannerisms, but as long as [she is] not forcing you, accusing you, or bullying you" she is expressing herself and entitled to do so.

I asked Paul if she was aware of Cole submitting any complaints to the Town's Human Resources Department, to which she said no. Paul stated that she's had no discussions with any third-party regarding the exchange. Her response to the video, however, is that she would have been a "little bit slower" and a "little bit calmer," but would not change what she felt.

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I next discussed Farrell's complaint regarding the May 5, 2025 Town Council meeting exchange with Caron. Paul started the discussion, stating that the exchange was a situation where she was "lied to." I asked Paul to explain her position. Paul alluded to a meeting on May 2, 2025 where she met with Caron, Bernard, and Councilor Dan Bouchard. The date provided by Paul did not correspond with what was reported by Caron or Bernard, nor does it align with the date referenced in the meeting video, in which Paul references the meeting as occurring on the 8th. As this meeting took place after Town elections, the only date that would fit the 8th is April 8, 2025 – March 8th predating the elections and May 8th not yet occurring.

One of the topics of discussion at the prior meeting was the PUD Ordinance. A topic of discussion was the option to "remove" the PUD Ordinance. Paul stated that she asked whether there were any projects in the "pipeline" as she was specifically concerned about a development on Auburn Road. Paul states that Caron told her "no." I followed up asking Paul if she was sure Caron was unequivocal in her statement of "no." Paul stated that she was. I asked her if Caron could have said that she had to check with the Town attorney first, but Paul was certain Caron said no.

Paul reported that at the subsequent Town Council meeting on May 5, 2025, she was told that the PUD Ordinance's removal would not have stopped the projects that she was concerned about, causing Paul to feel publicly embarrassed. Paul alluded to Caron having animosity against Paul. Paul stated, "Kelly Caron filed a sexual harassment complaint against me because I used the word seduced" as it relates to her role as the Community Development Director. Paul went on to say that the matter resulted in a lawsuit against the Town because former Town Manager Mike Malagutti submitted a formal complaint about the use of the word "seduce." She stated that the lawsuit arose because Farrell showed Paul the complaint, but refused to let her have a copy, resulting in a lawsuit filed under RSA chapter 91-A. When I asked whether the complaint came from Caron or Maligutti, Attorney Coyle stated that he would not go so far as to say that the complaint came from Caron but was submitted by Maligutti on behalf of "an employee [Caron]." Attorney Coyle then summarized the Superior Court action in Deb Paul v. Town of Londonderry, Rockingham County Superior Court Docket No. 218-2023-CV-00569. Coyle stated that the decision "lambasts" the Town and "frames how things were and how [Paul was] treated on first term." After the interview, I reviewed the Superior Court's decision, and a copy of that decision is appended hereto as Exhibit D.

Turning back to the May 5, 2025 meeting, Paul stated, with regard to Caron's statement regarding the PUD Ordinance's removal and that it would not impact certain developments, "[she] was shocked. You don't tell lies like that. You don't do that." I informed Paul that I define as lie as a "misrepresentation made with the intent to deceive." I asked Paul what made her believe that Caron lied? Paul stated that Caron has been trying to discredit Paul, referencing a Master Plan Committee where Caron and Paul had an exchange regarding a calendar issue and the last Town Council Meeting where Caron allegedly got "very hostile toward [Paul]" during a discussion of the Zoning Ordinance. Paul stated that she could "only take so much," but stated that she did not

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respond to the recent Town Council matter or to the Master Plan Committee matter. Paul stated that she believes Caron is trying to discredit her. Paul stated that she believed that Caron made a complaint to Maligutti and then Maligutti brought it forward and that Caron harbors "animosity" toward her. Paul stated that she believes that she was justified in taking the tact displayed at the May 5, 2025 meeting of the Town Council stating that it was a "human, natural reaction."

I addressed Farrell's allegation that Paul has stated that developers have to "pay to play" in Londonderry. Paul recalled that the exchange happened at the April 2025 meeting of the Planning Board. Paul stated that, during the meeting, she was sitting in the audience and approached during public comment, the issue was one of an anticipated PUD. Paul stated that she commented that there should be a development agreement and that there should be a little bit of "give and take" to find "neutral ground" between the developer and the Town. Paul denied using the phrase "pay to play," and insisted it was "give and take."

Interview of Kim Bernard

On August 1, 2025, I interviewed Bernard. I conducted the interview by telephone. The call was not recorded.

The interview started with a discussion of the April 14, 2025 Recreation Commission meeting. Bernard stated that he was "completely shocked about what transpired." Bernard stated that he called Cole and apologized for the incident. Bernard also stated that he approached Paul about the matter and said that Paul was "standoffish" and downplayed the interaction.

Bernard said that, as a supervisor, how Paul spoke to Cole was not the time or the place to talk to someone like that. In police work, Bernard would have characterized Cole's behavior as "conduct unbecoming." Bernard referenced that Paul "berat[ed] the kid" and that Paul was soliciting and berating Cole.

Bernard stated that he was contacted by Farrell. Bernard stated that Farrell said to the effect of "can you believe that she treated a kid this way?" Farrell's call prompted Bernard to watch the video and approach Cole to talk about it. Bernard said Cole's response was to the effect of "it is what it is."

With regard to the May 5, 2025 Town Council meeting, Bernard has not re-watched the video but acknowledged that he was there. Bernard stated that he does not "like how [Paul] talks and treats people." Bernard stated that he thought the conversation was professional until Paul started "going after Kellie." Bernard said that Caron handled it "better than most," however, Bernard also said that the interaction was not typical, but he was not shocked.

Bernard reported that after the meeting Caron was visibly upset but did not verbally address it. Bernard said that there was "no small talk" after the meeting and that Caron sought to get out

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of the office. Bernard stated that the meeting was a topic of discussion in Town for a couple of days.

I asked Bernard about the substance of the prior meeting between Caron and Paul. Bernard said that Paul and Councilor Bouchard were just starting out as councilors and that the PUD Ordinance was a "hill to die on." He mentioned that certain councilors wanted to stop a project. Bernard could not recall if he was speaking to the same meeting, but recalled the meeting being attended by Finance Director Justin Campo, Caron, Paul, Bernard, and Councilor Bouchard. Bernard remembered 4 projects being a topic of discussion. Bernard said that there was some discussion about going back and changing certain development agreements. Bernard said Caron is typically very "cautious and detailed" and is considered an "expert in her field."

Bernard recalled that, in response to the desires of the Council, Caron wanted the councilors to get their concerns in writing, at which time should would vet them. However, Bernard said that they only received responses from 2 councilors, neither of which came from Paul. I asked Bernard if there was a reference to needing to discuss a matter with legal counsel at the meeting. Bernard said that, if it was the same meeting, Caron tried to tell them that they could not take their desired action and would need to run the issue by the Town's legal counsel.

I asked Bernard about Farrell's allegation that Paul is misusing confidential information. Bernard was aware of the allegations in the Seidenberg emails, but Bernard could not think of any instances.

I next asked Bernard about his perception of Paul's capacity. Bernard said that you never know what to expect. Bernard did not think Paul has diminished capacity.

Bernard concluded the call saying that Cole "didn't deserve that" and "Kellie didn't deserve that either."

Second Phone Call From Richard Flier

On April 5, 2025, I received a second phone call from Richard Flier. Mr. Flier wanted to meet me in person. He stated that he did not want to put anything in writing and did not want to say what he had to say over the telephone. He said that his call was prompted by a call from Farrell.

I expressed concern about driving to Londonderry to interview Mr. Flier further given the limited nature of my charge and my direction to limit the investigation to the complaints raised. I informed Mr. Flier that many of his prior allegations were not related to Paul's role in the Town. As an example, I noted that the issue he raised related to antisemitism pertained to the Historical Society, which is not a Town body. Mr. Flier repeated his prior allegations against Paul, namely that Paul's husband has threatened him and that her friends and family have harassed him by

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vandalizing his property. I told Mr. Flier that such matters were outside of my charge. Mr. Flier expressed confusion as to what my charge is, to which I explained that my role was limited to ascertaining whether Paul engaged in misconduct as Town official.

Mr. Flier recommended that I speak to Mike Kettenbach, with whom Paul "had and continues to have a terrible relations with." Mr. Flier alleged that if people do not pay Paul, they will receive bad press in the newspaper and "she has people" that will go against a project for her. Mr. Flier repeated that Paul has a group of 5 people that she uses for such purposes.

I explained to Mr. Flier that in the various discussions that I've had with third parties, not one has provided specifics as to Paul requiring people to pay her for her activities as a Town Councilor or her misusing information. Mr. Flier said I should speak to Farrell and Bernand, to which I responded that I had and neither had the information he asserts that they do.

I suggested to Mr. Flier that, if he has a specific complaint, he should file one with the Town.

IV. Cited Provisions of the Town Charter

Section 4.8. Non-interference with Town Administration.

The Council shall act in all matters as a body. Except as expressly provided elsewhere in this Charter, neither the Council nor any of its members shall direct or request the appointment of any person to office or employment; or direct the removal, suspension, discipline, adjustment in pay, benefits, or working conditions of any employee by the Manager or of any of the Town department heads. No Councilor shall give orders to or interfere with the performance of the duties of any of the administrative officers or employees, either publicly or privately. Nothing contained in this section shall prohibit the Council from meeting with the Manager to discuss the operation or conduct of any department head or employee and to recommend an investigation and report by the Manager of any complaint. Any violation of the provisions of this section by a Councilor shall constitute grounds for forfeiture of office under the provisions of Section 3.3.

Section 6.7. Misuse of Information.

No elected or appointed officer or employee of the Town shall utilize or dispense information gained through said office or employment for personal profit or another's personal profit.

Section 8.11. Indemnification of Town Officers, Board Members, and Employees.

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The Town shall undertake to indemnify and save harmless all its officers, officials, volunteers, boards, commissions and employees from personal loss and expense. Expenses may include reasonable legal fees and costs, if any, arising out of any claim, demand, suit or judgment by reason of negligent acts or omissions if the indemnified person was acting in the scope of his office or employment and in good faith in accord with the provisions of State Law

Section 8.12. Prohibition.

- A. No person shall be appointed to or removed from, or in any way favored or discriminated against with respect to, any Town position or appointed Town administrative office because of age, race, sex, political or religious opinions or affiliations.
- B. No person shall willfully make any false statement, certificate, mark, rating or report in regard to any test, certification or appointment.
- C. No person who seeks appointment or promotion with respect to any Town position or appointed Town administrative office shall directly or indirectly give, render or pay any money, service or other valuable thing to any person for or in connection with his test, appointment, proposed appointment, promotion or proposed promotion.
- D. No person who runs for Town office shall orally, by letter, or otherwise, solicit or assist in soliciting any assessment, subscription or contribution for any political party or political purpose whatever from any person holding any compensated appointed Town position.

V. <u>Analysis</u>

Given the breadth of the complaints, I will break the individual components into manageable parts in order to address the concerns in a more organized fashion. Those categories are: (a) alleged mistreatment of employees, (b) alleged conflicts of interest due to Paul's ownership of a newspaper and misuse of Town information, (c) alleged misconduct occurring outside of Paul's role as a Town Councilor, and (d) Paul's alleged illness and the role thereof.

a. Alleged Mistreatment of Employees

Having reviewed the videos from the April 14, 2025 Recreation Commission meeting and the May 5, 2025 Town Council meeting, it is my opinion that Paul's behavior did not rise to the level of violating any pertinent provision of the Town Charter or New Hampshire law. For that reason, I have found that the allegations unfounded Paul as those allegations specifically relate to Paul's treatment of Cole and Caron.

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Paul's conduct during the April 14, 2025 and May 5, 2025 meetings do not rise to the level of being "abhorrent" or "abusive" as described in Farrell's complaints. Turning first to the April 14, 2025 Recreation Commission meeting, Paul did not engage in name-calling, did not use threats or course language. Paul's interactions directly with Cole, as opposed to the other attendees at the meeting, was limited. Paul's tone could be characterized as accusatory – i.e. "why don't you ever contact the newspaper about any of this stuff. Ever" and "you never, ever, ever, reach out to us to cover this stuff." However, her accusatory comments pointed at Cole are limited in time and nature, and are not objectively severe. The same can be said of Paul's statement to the effect that Cole had a "phobia" of the newspaper. The remark is of such a limited duration and, viewed in its worst light, is only somewhat objectionable. The fact that Cole himself did not file a complaint with the Town's Human Resources Department or speak to any significant number of people about the incident belies the fact that Cole did not view it as severe or actionable. Cole himself recognizes that in his position there is an expectation of having "thick skin." While Paul's tone and demeanor are confrontational, confrontational speech is not prohibited, particularly in public sector employment, where there are First Amendment implications.

Turning to Paul's conduct during the May 5, 2025 meeting, I reach the same conclusion. There is a clear disagreement between Paul and Caron as to what actions transpired prior to the May 5, 2025 meeting. Paul believes that Caron was unequivocal in her statement that "removing" the PUD Ordinance would not allow certain projects to proceed. Caron (as corroborated by Bernard) was equally certain that her statement was that she had to contact the Town attorney about the matter. I have no reason to doubt the sincerity of either individual's recollection, particularly given the passage of time, and I do not need to ascertain who was right to make a determination of whether Paul acted inappropriately during the May 5, 2025 meeting.

During the May 5, 2025 meeting, there was a vocal and articulated disagreement between Paul and Caron about what transpired. Caron's tone and demeanor was professional and measured throughout. Paul's tone was argumentative at times. However, Paul did not make accusations in public (as she did during her interview), did not direct insults at Caron, and did not use foul of profane language. Paul held firm in her assertions, as did Caron. Paul's voice was elevated at times, but did not, in my opinion, cross into the line into yelling. Paul took a similar tone during her interactions with other Councilors during that exchange, and I did not observe any members of the Council take offence to Paul's tone or demeanor sufficient to speak out against it either on their own behalf or on Caron's behalf. In my experience, Paul's tone and delivery was not shocking or unusual in the context of municipal governance. That Caron herself acknowledged that she did not believe the conduct was "abhorrent" or "abusive" and was not unusual in her experience supports this conclusion.

Paul's conduct also did not violate Section 4.8 of the Town Charter. At the April 14, 2025 meeting of the Recreation Commission, Paul did not "giver orders to" or "interfere with the performance of any of the administrative officers or employees." Paul's comments can, at best, be considered as encouragement to allow for information about the Recreation Department to reach

Town of Londonderry June 19, 2025 Page **26** of **30**

a greater number of the public. Farrell's suggestion that Paul could not raise these concerns during a Recreation Commission meeting, with all members of the Recreation Commission and Recreation Department staff present, and instead that Paul should have directed the comment to the Town Manager ignores the purpose of having public meetings and having a liaison from the Town Council present at such meetings. That Paul did not "interfere" in Recreation Department operations is evidenced by the fact that, according to Paul, neither Cole nor Recreation Director Psaledas have provided information to the Londonderry Times following the April 14, 2025 meeting. Had either individual felt in some way compelled due to Paul's comments to supply information to the Londonderry Times, it is reasonable to conclude that they would have acted in accordance with Paul's suggestions.

The same could be said of the May 5, 2025 meeting of the Town Council. It is undisputed that the Town Council has the ability to amend the terms of the Zoning Ordinance. See Section 9.5 of the Town's Zoning Ordinance; RSA 675:2. Paul sought to discuss amending the terms of the Zoning Ordinance. In furtherance of that discussion, Paul directed questions and comments to the Assistant Town Manager and Community Development Director, who Bernard (the acting Town Manager at the time) acknowledges is the subject matter expert for the Town in this area. I do not believe that directing inquiries during a public meeting to a Town employee that is a subject matter expert, in the Town Manager's presence, on an issue within the purview of the Town Council constitutes a violation of Section 4.8 of the Town Charter.

Lastly on this issue, Paul's conduct during the April 14, 2025 and May 5, 2025 meetings did not violate Section 8.12 of the Town Charter. There is no suggestion that either Caron or Cole were discriminated against because of "age, race, sex, political or religious opinions or affiliations." There is no allegation that Paul willfully made a false statement on any "test, certification, or appointment." There is no allegation that Paul paid money in connection with any appointment or promotion. There is no allegation that Paul, when she ran for office, solicited a contribution from a political party. Those activities constitute the prohibited acts under Section 8.12, and Farrell himself acknowledged that that aspect of his complaints was a "stretch."

In reaching these conclusions, I am opining on whether Paul engaged in actionable misconduct under the Town Charter and New Hampshire law. I am not commenting as to whether Paul's tone, delivery, demeanor, and manner of speaking constitute optimal personnel practice or will ensure retention of employees. Clearly, there are differing opinions on the matter, and I make no comment in that regard.

b. Alleged Conflicts of Interest and Misuse of Information

The allegations that Paul engaged in a conflict of interest or misused information is not substantiated by the evidence provided during this investigation. Part of the complaints appear to

Town of Londonderry June 19, 2025 Page **27** of **30**

arise from a misconception about what a councilor can and cannot say. This stems from apparent misconceptions as to the standards for recusal in municipal government.

Whether a public official should recuse themselves depends on the role in which they are acting. Town officials, especially Town Councilors and members of Planning Boards, can sit in an executive, legislative, or quasi-adjudicative capacity. The applicable standards for recusal depend on what capacity the public body is acting in. When a public body is acting in a quasi-adjudicative capacity – meaning that they are considering evidence and the competing rights of others and reaching a decision after deliberation – New Hampshire law requires adherence to the so-called "juror standard." See Loughlin on Local Government Law, 13 N.H. PRACTICE SERIES § 585. Under this standard, if a Town Official would be disqualified from sitting on a jury on a hypothetical matter due to that person's relationship to the parties, attorneys, or experts, or had reached a predetermination on the issue, the town official should similarly recuse themselves from that issue. See Winslow v. Holderness Planning Bd., 125 N.H. 262 (1984).

A public body, however, does not always operate in a quasi-adjudicative capacity. In instances where the public body is considering amending ordinances and policies, it is operating in a legislative capacity. In instances where the public body is considering expenditures or vendor selection, it is acting in an executive capacity. The standard for recusal for when a public body is acting in a legislative or executive capacity is whether the official has a "direct personal and pecuniary interest" in the matter being discussed. See Preston v. Gillam, 104 N.H. 279 (1962). This is a less exacting standard than the quasi-adjudicative capacity.

When an individual is recused, it is appropriate for that recused individual to excuse themselves from the dais and sit in the audience. When they do so, that individual still enjoys their right to exercise free speech under the First Amendment of the U.S. Constitution and its New Hampshire analog. A further misconception that is at the heart of these complaints is that Town officials check their First Amendment Rights at the door when they are elected. This is not accurate. Town officials retain those rights and can voice their opinions on matters of public importance. To be clear, depending on how they voice their opinions, that public official may be subject to a request to recuse if, at a later point in time, they are asked to sit in a quasi-adjudicative capacity and their prior comments tend to show predetermination or bias, but that does not mean that the individual cannot express their opinion on a matter. This is also not to say that a public official should not still exercise a degree of caution in what is said publicly to avoid personal statements being attributed to the Town in litigation. Such a discussion is well beyond the scope of this investigation, but suffice it to say, elected Town officials may continue to exercise their First Amendment rights and espouse their political beliefs once elected.

With this background, I turn to the allegations related to Paul's alleged conflicts of interest. Paul's ownership of the newspaper does not create a conflict of interest. There is no provision in New Hampshire law that disqualifies a member of the press or the owner of a newspaper from

Town of Londonderry June 19, 2025 Page **28** of **30**

public office. While care should be taken in not allowing those two roles to become blended, I did not receive any clear evidence reflecting that was the case as it related to Paul.

Despite asking the questions of the various individuals noted above, several of whom appeared to have a long and contentious history with Paul, not one was able to provide any clear instance in which Paul had sought to use her position on the Town Council to benefit the Londonderry Times. No interviewee identified an instance where Paul sought to compel Town employee cooperation with the newspaper. No interviewee identified an instance where Paul disclosed confidential information to the newspaper. While there is rumor and supposition, no interviewee identified any specific instance of misconduct in this regard. As such, the allegations that Paul misused information for personal gain in violation of Section 6.7 of the Town Charter were not substantiated.

On the issue of whether Paul engaged in misconduct by pressing Cole and other attendees at the Recreation Commission meeting on April 14, 2025 to tell information to the newspaper, the "financial benefit" in violation of Section 6.2 of the Town Charter, the alleged "financial benefit" is far too tenuous for me to conclude that a violation arose. For one, Paul's comments were geared toward having the public informed about the good work being done by the Recreation Commission. There is no solicitation for advertising and no suggestion that Paul or the Londonderry Times would receive financial compensation from the Town for running a story. The suggestion that the stories would lead to increased circulation and, thus, increased advertising revenues is too tenuous to implicate the conflict-of-interest provisions of Section 6.2 of the Town Charter. Second, there is no violation of Section 6.2 because the discussion was not "taking part in a decision concerning the business of the Town." Paul provided a suggestion, one delivered in a somewhat confrontational manner, but a suggestion nonetheless. Lastly, Paul provided a reasonable explanation about how running a story for the Recreation Commission would actually come at a financial loss to Paul, as she would have to forego running a story that she paid for and "eat" that cost.

Turning to the allegation that Paul violated Section 6.2 Town Charter by taking part in the discussion of the Town's banking institution and suggesting Enterprise Bank, I find Paul's explanation on that issue reasonable. Paul identified that her protocol for dealing with individuals who have advertised with the newspaper is to give a one-year period prior to sitting on matters involving that business. Paul stated that she had not run an advertisement with Enterprise Bank for a period in excess of 1 year when she sat on the discussion of the Town's chosen banking institution. While Paul's "1-year" rule may not be appropriate in all instances, I cannot say that such a rule was inappropriate here, particularly where the April 21, 2025 meeting minutes do not reflect that the Council was being asked to "deliberate" on any matter, and only reflect that the Town's Finance Director Justin Campo was providing an update on an RFI. A copy of the April 21, 2025 meeting minutes are attached as **Exhibit G**.

Town of Londonderry June 19, 2025 Page **29** of **30**

To address, the alleged "pay-to-play" comments, this allegation is unfounded. The meeting minutes from the April 9, 2025 meeting of the Londonderry Planning Board confirm Paul's explanation that her comment was "give and take" between the Town and the developer regarding a development. This is not an inappropriate comment made in the context of the Planning Board process, particularly as it relates to complicated developments.

Lastly, the suggestion that Paul is somehow using the newspaper as a "propaganda tool" is not actionable misconduct. Individuals are allowed to publish their political opinions, whether it be through a controlled newspaper, or a controlled blog, or a controlled Facebook page. That the Londonderry Times is a newspaper and may run afoul of journalism standards is outside the scope of this investigation. Such activities do not constitute actionable misconduct under the Town Charter. If the voters do not agree with Paul's statements, then the recognized recourse is at the ballot box. If readers do not agree with Paul's statements, they can seek to discontinue receiving the Londonderry Times.

c. Alleged Misconduct occurring in Paul's private capacity

Much of the complaints made by Farrell and Mr. Flier pertain to Paul's conduct in the operation of the newspaper and her private activities. This report makes no comment regarding those allegations. To the extent that such behavior, if true, should disqualify Paul from acting as a public official, that is an issue that should be left to the voters. To the extent that the complaints assert that Paul is "unethical" or "immoral" or not of a good character, such issues are outside the powers of this investigator to opine upon. So long as the Town Charter and New Hampshire law is not being violated by Paul in her capacity as a Town Councilor, there is little action that can be done legally, and such issues lend themselves to resolution through the political process.

d. Paul's capacity to act as a Town Councilor

Lastly, to turn to Farrell's primary concern, which is that Paul's mental state leaves the Town at risk and should merit Paul executing a "hold harmless" or "indemnification" agreement. I am neither qualified, nor capable of rendering an opinion on this issue. I am not a physician or a psychologist. I am not trained to render opinions as to mental capacity or impairment. I did examine Paul from a psychologist's perspective, nor was I asked to arrange for such an examination with a third party.

Therefore, I can only lend my lay observations. In my interactions with Paul and in the conduct of interviews with others, I made no observations which would lead me to believe that Paul's capacity or mental/emotional condition was such that Paul was incapable of performing her duties as a Town Council such that the Town Council could compel Paul to execute a "hold harmless" or "indemnification" agreement. I met Paul in person in my office. I observed no issues of hygiene or deficiencies in self-care. Paul exhibited no difficulties with speech and spoke clearly.

Town of Londonderry June 19, 2025 Page **30** of **30**

Paul's responses were not irrational and followed logical progression. Paul appeared able to remember events from several years ago, although her recall was not perfect. Although Paul made statements that may be objectionable to a third-party, those statements were not, in my opinion, indicative of any cognitive or psychological impairments or conditions. Other individuals interviewed, most notably Caron, did not express concern for her capacity.

To be clear, certain individuals interviewed expressed pointed concerns, i.e. Farrell, and l other alluded to vaguer concerns – Bernard. Those concerns arose out of the aforementioned interactions, which, while potentially uncomfortable and confrontational, did not cross into the realm of misconduct. While Paul's comments were, to one interviewee, "bordering on unprofessional" both Caron and Cole acknowledged that Paul's demeanor was not unusual.

Based on the totality of the evidence, I am unable to conclude that a basis exists for the Council to compel Paul to sign an indemnification agreement or to seek to remove Paul for incapacity.

VI. Conclusion

In reaching these conclusions, please note that I operated under the limitation of investigating Farrell's complaints and limiting the number of witnesses interviewed. There were other individuals that Farrell and others suggested that I interview. One notable individual is Former Town Manager Kevin Smith. Per instructions, I did not do so, as that was proceeding beyond the four-corners of the complaint.

If either you or members of the Council have any questions, comments, or concerns regarding this report, please let me know.

Very Truly Yours,

DONAHUE TUCKER & CIANDELLA, PLLC

Eric A. Maher, Esq. emaher@dtclawyers.com

Enclosures

TOWN OF LONDONDERRY CHAPTER XXVI CODE OF ETHICS COMPLAINT FORM

Please complete this form legibly and in as much detail as possible. Additional pages may be added: Your Name: Address: Phone (Day Person(s) against whom this complaint is made: Will (Department/Board/Committee): TOWN COUN, CL (Department/Board/Committee): Description of the complaint in detail: (Use more paper and attach, if necessary.) With my signature, I declare that the statements made above are accurate and truthful to the best of my knowledge. Signature

Completed forms should be sealed and delivered to the Town Manager's Office. If the complaint involves a Town Employee, the envelope should be addressed to the Town Manager; if about the Town Manager or an appointed Board or Commission member, please address to Chair, Town Council. If the complaint involves an elected official, please address to Chair or Vice Chair of that elected body (e.g. Town Council, Budget Committee, etc.).

Title VI – Town Policy

Budget Committee, etc.).

TOWN OF LONDONDERRY CHAPTER XXVI CODE OF ETHICS COMPLAINT FORM

Please complete this form legibly and in as much detail as possible. Additional pages may be added: JOHN FARELL Your Name: Address: Phone (Daytin Rerson(s) against whom this complaint is made: (Department/Board/Committee): Jown Council (Department/Board/Committee): Description of the complaint in detail: SEE ATTACKED (Use more paper and attach, if necessary.) With my signature, I declare that the statements made above are accurate and truthful to the best of my knowledge. Completed forms should be sealed and delivered to the Town Manager's Office. If the complaint involves a Town Employee, the envelope should be addressed to the Town Manager; if about the Town Manager or an appointed Board or Commission member, please address to Chair, Town Council. If the complaint involves an elected official, please address to Chair or Vice Chair of that elected body (e.g. Town Council,

Chapter XXVI Page 8 of 8

Code of Ethic's Complaint

Behavior of Councilor Paul at the May 4 2025 Town Council meeting

- The abhorrent and abusive behavior and bullying tactics towards employee Kellie
 Caron during the meeting starting at approximately 2 hour 56 minute of the
 recording on the PUD
- Violation of section 4.8 non interference with Town Administration dictating the process demanding a change while not following the rules and regulations.
- Violation 6.7 Mis use of Information (Using the influence of the newspaper for your own personal gain) Knows about new projects uses her newspaper to create a atmosphere of intimation, bullying and threats
- 8.12 Prohibition for the abusive behavior towards an employee, yelling in threating tone and bullying towards Ms. Caron (The excuse will be my Lyme rage)
- 8.11 Indemnification: The constant excuse for this behavior has been Lyme rage invoked by Councilor Paul. Has this section been waived by Debra Paul due to an uncontrollable medical condition. Has this condition been disclosed to Primex? The town's insurance carrier. Or is this all a just a ruse to excuse this behavior. Has Ms. Paul signed a hold harmless statement indemnifying the town of Londonderry from this behavior? Has this condition been disclosed to the Staff, Town Council and the voters?

If none of this has happen; why not? At a minimum a public reprimand and public apology to Kellie Caron needs to happen.

Additional items to note in this weeks Londonderry Times the plagiarism continues by Councilor Paul in the editorial. multiple offenses) Paul has stated in the past she writes the editorial. See the attached cut out directly from the publication and the comparison attached.

Plagiarism is the act of presenting someone else's work or ideas as your own without giving proper credit or attribution. It can include copying text, ideas, or images without permission or acknowledgment, and is considered a form of intellectual theft.

Is plagiarism cheating or stealing?

It is considered theft because the writer takes ideas from a source without giving proper credit to the author. It is considered fraud because the writer represents the ideas as her or his own. Plagiarism is cheating.

Call it misinformation, making things up to fit a narrative, telling false stories of corruption or crimes that never occurred about individuals. This behavior is not becoming of an elected official who serves as a Town Councilor and Election official. Shameful disgraceful behavior that needs to be addressed in public. Elected officials need to be held to a higher standard, they also need to be held accountable for untrue actions and statements.

Deliberate fraudsters – These individuals knowingly copy work to deceive or gain an unfair advantage, often without regard for ethics.

Editorial: To our moms, on their day

By <u>DAILY PRESS</u> | <u>dailypress@dailypress.com</u> UPDATED: August 12, 2019 at 9:18 AM EDT

"All I am I owe to my mother. I attribute my success in life to the moral, intellectual and physical education I received from her."

— George Washington

What a mother Mary Bell Washington must have been, to have had such a profound influence on the Father of our Country. But then, in many ways our first president's words also sound like the basic job description under the title of mother.

In Saturday's paper, we published the words of many readers describing the lessons they learned from their moms. Those lessons were probably not drastically different than those absorbed by our first president.

As we celebrate Mother's Day today, we honor the women who shaped us, nurtured us, taught us and showed us what life and love are about. True, fathers do all of those things, too, but in different ways. It's not about whose role is bigger or better, and it's not even about conforming to the specific gender roles. It is simply acknowledging that both parents influence our lives through the choices they make with us, and each one's influence is distinct from the other.

The image of motherhood has changed in so many ways over the past half-century or so, and yet in many ways it has barely changed at all. There used to be a simplified image of what it meant to be a mother in American culture, crystallized in the characterization of June Cleaver or Claire Huxtable. Today we acknowledge birth mothers, stepmothers, foster mothers, surrogate mothers, same-sex mothers, single mothers, working moms, military moms and many other varieties.

But has their role really changed so much?

Their job is still tireless and often thankless (until the kid are old enough to recognize how much was sacrificed for them, which for some isn't until their 20s or even later). When it is done right, the job is still about unconditional love, even when that means tough love.

It remains a lifelong commitment. Even after a child is grown, graduated and employed, mom is still mom, and moms will always worry. If an adult child weds, even procreates, the

mother continues to look out for her offspring. They cut the umbilical cord at birth, but there are other bonds that stay intact.

And when the world is harsh, when life pokes us in the eye and laughs at us, it is often our first instinct to seek comfort in a mother's love.

"If pa's eyes were windows into a world so deadly and true / You couldn't stop me from looking but you kept me from crawlin' through / And if it's a funny old world, mama, where a little boy's wishes come true / Well I got a few in my pocket and a special one just for you." — **Bruce Springsteen**

So for Mother's Day, we have a few special wishes for the moms out there — any age, any stage of life, and with any prefix or modifier in front of the word *mother*. We hope you are surrounded by family today. If they can't make it home, we hope they at least call. Flowers would be nice. If they take you out to eat, let them pay, even if that goes against your maternal instinct.

We hope at least one person doesn't stop at "Happy Mother's Day," but elaborates at least a little bit on the depths of their gratitude and the reasons for it. Maybe they could share an anecdote or two, whether the goal is to make you laugh, or cry, or both.

We hope you feel pride today. That when you look at the child or the children on whom you have had an influence, you see the kinds of people you wanted them to be. It is OK to be proud not only of them, but of yourself for the role you played in getting them to where they are.

Hugs. Always hugs.

And, on a personal note, a couple of members of our Daily Press family have very recently become new moms. For their first Mother's Day as moms, we send a very joyful greeting to Beth (and baby Anslie) and to Megan (and baby Carter).

"Because I feel that, in the Heavens above / The angels, whispering to one another, / Can find, among their burning terms of love / None so devotional as that of 'Mother'"

— Edgar Allen Poe

Originally Published: May 27, 2017 at 3:00 AM EDT

TOWN OF LONDONDERRY CHAPTER XXVI CODE OF ETHICS COMPLAINT FORM

Please complete this form legibly and in as much detail as possible. Additional pages may be added:

Your Name:	OHD FARRECC
Address:	
Phone (Daytime	
Person(s) against wl	nom this complaint is made: (Department/Board/Committee): Torn Course ((Department/Board/Committee):
Description of the co	omplaint in detail:
SEE A	SENT TO TOWN MANAGER
Files	SENT TO TOWN MANAGER
(Use more paper and	attach, if necessary.)
With my signature,	I declare that the statements made above are accurate and truthful to the best of m
knowledge.	5/1/25
Sig	gnature Date

Completed forms should be sealed and delivered to the Town Manager's Office. If the complaint involves a Town Employee, the envelope should be addressed to the Town Manager; if about the Town Manager or an appointed Board or Commission member, please address to Chair, Town Council. If the complaint involves an elected official, please address to Chair or Vice Chair of that elected body (e.g. Town Council, Budget Committee, etc.).

Ethic code violations:

Councilor Debra Paul

- Section 4.8 Non Interference: Choosing when Ms Paul is a Councilor and when she is the Publisher/Editor of the newspaper.

When serving as an elected official, you are not legally "on the clock" 24/7, but you are accountable to the public at all times. This means that your actions, words, and decisions — even outside official working hours — can be scrutinized and judged by your constituents, the media, and ethics bodies.

Here's how that plays out:

- **During work hours**: You're expected to perform your official duties responsibly and transparently.
- Outside work hours: While technically off-duty, your behavior still reflects on your
 office. Misconduct, conflicts of interest, or inappropriate actions (even in private life) can
 lead to public backlash or formal consequences.

In short:

You're not required to be actively working 24/7, but your conduct is always subject to public accountability. It comes with the territory of public trust

- Ms. Paul on a regular basis calls town staff and states she is calling for the newspaper, how is the staff to understand or recognize which one is happening.
- As demonstrated by the Seidenberg emails, Ms. Paul controls the assignment of the stories and has a history of altering the content to meet her personal narrative.
- Interference in the Planning Depart and Planning Board April 9, 2025 meeting, making public comments directed at applicant Ken Solinsky that his project needs to be more of a give and take for the town "Pay to Play" This is public statement by an elected official implying extortion.
- Extortion is generally defined as the illegal act of obtaining money, property, or a
 valuable thing from another person through threats or force. These threats can
 involve harm to the victim's person, property, reputation, or even a threat of
 exposing damaging information. In essence, extortion involves using fear or
 coercion to compel someone to give up something they would not otherwise have
 surrendered.
- Extortion is a felony in New Hampshire
- On April 21, 2025 Councilor Paul during a presentation by the Finance Director attempt to influence the Decision by the Town Treasurer on the Selection of the

Banking Partner for over 100 million in revenue. Enterprise Bank was brought several times, this Bank advertises in the Newspaper owned by Debra Paul and she stated she does her business with them today. Conflict of Interest under 6.2 Interference with staff and the Elected Town Treasurer to use her influence as an elected official to send taxpayer revenue to her customer.

 Addition evidence to support the conflict has been sent to the Town Manager electronically.

Violations of Section 6.2 A&B

Fails to make disclosures to the Town Council and public on decisions for personal Gain. ie: Enterprise bank, Old Home Day ads using her position to influence local businesses to advertise "Pay to Play" School public notices should stop being paid, although a separate form of government all of the dollars/revenue is under the control of the town for disbursement which is under the control of the Town Council. Councilor Paul is profiting from these actions.

Violation of 6.7 misuse of Information: No elected or appointed officer or employee of the Town shall utilize or dispense information gained through said office or employment for personal profit or another's personal profit.

 Multiple Town Council meetings and Liaison meetings promoting the use of the local newspaper. Reference Seidenberg emails for the evidence that she controls the content of the stories, editorial, approval of letters to the editor to control the anti growth/development and personal agenda of her own.

Review of Section 8.11

Indemnification of Town Officers, Board Members, and Employees The Town shall undertake to indemnify and save harmless all its officers, officials, volunteers, boards, commissions and employees from personal loss and expense. Expenses may include reasonable legal fees and costs, if any, arising out of any claim, demand, suit or judgment by reason of negligent acts or omissions if the indemnified person was acting in the scope of his office or employment and in good faith in accord with the provisions of State Law.

-8.11 Indemnification: The constant excuse for her inappropriate mis behavior or abuse has been Lyme rage invoked by Councilor Paul. She also has discussed in public that she has syphilis of the brain and the lesions on her brain. See the attached description of the violent nature of this behavior, medical cognitive, memory and judgement issues with decision making. Has this section been waived by Debra Paul due to an uncontrollable medical condition. Has this condition been disclosed to Primex? The town's insurance carrier. Has Ms. Paul signed a hold

harmless statement indemnifying the town of Londonderry from this behavior? Has this condition been disclosed to the Staff, Town Council and the voters? Why should the taxpayers be held liable for her behavior and non disclosure of these conditions.

Either recuse from all decision making or submit a resignation to the Town Council being unfit to serve due to medical and mental conditions from the diagnosed diseases.

If none of this has happen; why not? This needs to be addressed and is a major expose point for the Taxpayers of Londonderry. What was this not disclosed to the general public with such during the election season.

Review of Section 8.12 Prohibition

 Abuse of the employees, idle threats to their positions, consent solicitation of the use of her newspaper business for personal gain

Possible part to Perjury in Superior court documents

Attached documents and those sent electronically to the Town Manager and The Finance Director call into question the actions of Jonathan Esposito regarding filing in Rockingham Superior Court.

Case Number # 218-2024-CV-00307

Gannett Publishing vs Nutfield Publishing

Upon review of the documents Deb Paul electronically signs to represent herself as a non Attorney. The email address for contact is belongs to Jonathan Esposito Londonderry Member of the Trustee of the Trust Funds an elected position.

A Second Document regarding the Judgement also lists Jonathan Esposito's email as the legal on contact. This document shows that it was sign on Behalf of Debra Paul and Nutfield Publishing. The complaint is was Esposito acting as Debra Paul's Legal agent?

Was this disclosed to the Superior Court that she was no longer representing herself in this matter.

The documents are clearly stated that any false statements made in this motion are punishable as perjury which may include a fine or imprisonment.

Is Debra Paul a party to this perjury? Was it her responsibility to disclose to the Rockingham Superior court that she was no longer representing herself in this matter.

Debra Paul obvious in collaboration with a Londonderry Elected official prior to running for office again.

Is Jonathan Esposito a Member of the New Hampshire Bar Association?

Is Jonathan Esposito falsely representing people as a self proclaimed attorney?

Is Jonathan Esposito party to perjury on court documents?

An investigation should inquire/ demand the public record from Superior Court of all email transmission on Case Number # 218-2024-CV-00307

The state's criminal code, RSA 641:1, outlines the penalties for perjury. A person can be found guilty of a Class B felony

This Should all be referred to the State Attorney General; Additionally, the Town Council should review Section 6.1 Conditions for Hold office

There is clearly enough areas being called in to question to warrant a investigation under 3.14 of the Town Charter. Perhaps you should consider a third party to conduct the investigation or since it's an elected official refer the entire matter to the Department of Justice/ Attorney General.

At a minimum a public reprimand and public apology to Taxpayers /voters needs to happen. There also needs to be a public reporting of these action and investigation.

From: Jonathan Esposito

Sent: Monday, April 24, 2023 9:12 PM

To: TownCouncil < TownCouncil@londonderrynh.org>; Michael Malaguti

<mmalaguti@londonderrynh.org>

Subject: Courtesy

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Jim Green doubling down on his rudeness tonight and the Council Chair not addressing it is yet again shameful behavior from this council. He is an out of control animal with the way he addresses citizens.

Interesting watching Michael Malaguti stumble thru the presentation on the Macks lease. Judging from public comment, you people have been making backroom deals again.

I'll be inquiring.

Please add this letter to the minutes of tonight's TC meeting.

Jonathan Esposito

Ethics code Violation Debra Paul Town Councilor

Section 1: Multiple areas of concern and or violation for conflict of interest:

Liens on	Londonderry, NH the councilors primary residence.	
2012 Geo Foster and Company 47,000		
January 2016	\$1,501 Dept of Employment Security	
May 2016	\$1,285 exist can't find who it is unlisted	
May 2016	\$4,448 Dept of Employment Security	
Jan 2017	\$34,851 Nutfield taxes	
Oct 2020	\$ 4,288 Discover card default judgement	
Dec 2016 ·	\$76,632 IRS was over 160,000 withholding employee payroll deductions	
July 2019	\$21,728 (Printing company) Default	
Oct 2021	\$ 1,811 Dept of Revenue	
May 2022	\$ 955 Dept of revenue (DRA)	
May 2024	\$ 46,000 Default judgement Gannett Publishing Lien pending approval	

This information calls into question the ability to be unbiased. Many financial decisions made by the Town Council involve complex tax and revenue implications. The behavior above demonstrates a complete disregard or a complete lack of understanding of how our system of government functions. Additionally, the actions of receiving services from vendors and just not paying is criminal and theft of services. Payment was not withheld for poor service as a default judgement was declared.

- Conflict of interest (Constant public behavior opposing all taxes, warrant articles, union agreements all with ties to DRA which obviously Councilor Paul shows no regard and doesn't pay her taxes. Additionally, this also ties into the Department of Employment & Security and disregard for paying those fees.
- Default judgement: is a legal ruling issued by a judge in favor of one party (usually the plaintiff) when the other party (the defendant) fails to respond to a legal action, such as a lawsuit, or to appear in court. This means the defendant has effectively conceded the case by not defending themselves, and the court will grant the plaintiff's requested relief.

Perhaps all of this misjudgment and misunderstanding of the law, rules and regulations are a result of the overwhelming medical and mental conditions Ms. Pauls claims she was

diagnosed with and shares with anyone who will listen. If not this is further evidence of gross misconduct and a complete disregard for any rule of law.

Under either circumstance the council should review if Councilor Paul is unbiased regarding these agencies? Additionally, Since the Councilor has demonstrated that she is willing to not pay her own vendors will she be unbiased with the Taxpayer's dollars.

Consider recusing of Debra Paul from decisions involving the Department of Revenue Administration. Any Vendor no votes should be questioned and or scrutinized.

If the reason for all of the actions are indeed a medical and or mental heath issue serious consideration should be given to submitting a resignation to the Town Council.

If not a public disclosure should be made that Councilor Paul's decision could be affected by her past behavior.

[&]quot;The best predictor of future behavior is past behavior"

Key Elements of an Elected Officials' Code of Conduct

1. Integrity and Honesty

- Always act in the public interest.
- o Avoid deception, favoritism, and personal gain. (See Seidenberg emails)

2. Transparency and Accountability

- o Disclose conflicts of interest. (see all attached information)
- Be open about decision-making processes and use of public resources.

3. Respect and Civility

- Treat colleagues, staff, and the public respectfully. (Constant abuse) see 4/16,25 rec committee meeting, see 8/12/22 Kirby Brown email pattern of behavior
- Avoid abusive language or behavior. (First sponsored vote to reverse the profanity rule, consent claim of Lyme rage to justify behavior)

4. Confidentiality

 Respect confidentiality of sensitive or classified information. (Controls the content of the local newspaper see Seidnenberg emails)

5. Impartiality and Fairness

- Avoid bias in decision-making. (Facebook posting, Editorial content, newspaper stories, being interviewed by her own employee/contractor for comment, pay to play comments to local businesses, refusal to cover events unless you take out an ad)
- Do not give preferential treatment to individuals or groups.(See above comment and Seidenberg emails)

6. Use of Public Resources

Use taxpayer-funded resources (time, staff, funds) only for official duties.

7. Conflict of Interest

- Declare any personal or financial interests that could influence duties.(Demands to be paid for ads in the newspaper, Pay to play with local business who are afraid of retaliation)
- Recuse oneself from votes or decisions where there is a conflict. (Should recuse from all land use boards and land use ordinances, use newspaper, influences letters to the editor to support her personal agenda and narrative.)

8. Adherence to Laws and Policies

Follow all applicable laws, regulations, and internal policies. (Convicted of Election laws, should be required to step down as an election official.

9. Responsibility to Report Misconduct

o Report unethical or illegal behavior by colleagues or staff.

10. Public Engagement

- Encourage open communication with constituents. (Uses the local Newspaper to control
 her personal message of zero growth while reporting misinformation unchallenged with
 no third party information opportunities to correct or dispute)
- Provide accurate and timely information. See Seidenberg emails and the constant abusive use of 91a's by her attorney Kevin Coyle costing the taxpayers over \$30,000 in fees.

Misconception Phases or actions things to watch

- I never...
- Always speaking in absolutes
- Liars always answer quickly depending on the circumstances

1. Inconsistent Stories

· Their version of events keeps changing or contains contradictions.

2. Too Much or Too Little Detail

 They may give too much irrelevant detail to seem convincing, or be vague to avoid being caught in a lie.

3. Avoiding Eye Contact (or Overcompensating)

They might look away often—or stare too much in an attempt to appear honest.

4. Unnatural Body Language

 Nervous gestures (fidgeting, touching the face), stiff posture, or lack of natural gestures can be signs.

5. Delayed Responses

• They may pause longer before answering, trying to fabricate a story.

6. Verbal Tics and Qualifiers

Phrases like "to be honest," "I swear," or "believe me" may be used excessively.

7. Incongruence Between Words and Expressions

 Smiling while describing something sad, or a mismatch between tone and facial expressions.

8. Defensiveness or Aggression

• They may become unusually defensive or hostile when questioned.

9. Repeating the Question

· This gives them more time to think or may be used to buy time.

10. Microexpressions

• Brief, involuntary facial expressions may reveal hidden emotions like guilt or fear.

See below direct evidence of Deb Paul controlling the content and story



From: John W. Farrell < jfarrell@londonderrynh.org>

Sent: Wednesday, July 21, 2021 12:31 PM

To: John Farrell

Subject: Fwd: John story

John Farrell

Begin forwarded message:

From: John Seidenberg

Date: July 20, 2021 at 1:52:21 PM EDT

To: "John W. Farrell" < jfarrell@londonderrynh.org>

Subject: Fwd: John story

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

John,

I just wanted to pass along this message to you. I watched last night's meeting to hear Kevin bring up the budget story. Despite Deb telling him the paper would run a correction, this email from her is closer to what I expected her response to be.

I wrote a dull story so it needed spicing up to interest readers. The changes made reported something false though that's really beside the point. It's actually my fault the story was changed.

My sympathies to the town having someone like this holding office and treating the paper as a vehicle to run what she pleases, as long as it aids in her next campaign.

THE FIRST TELM

Sent from my Verizon, Samsung Galaxy smartphone Get

From: Deb Paul

Sent: Tuesday, July 20, 2021, 10:12 AM

To: John Seidenberg **Subject:** FW: John story

This is what Chris

It was the second paragraph to get readers interested in a otherwise boring story.

Although Smith didn't give many details about it at the meeting, he divulged that because of a recent tax abatement awarded to the Granite Ridge Power Plant, there would most likely be a need to raise residential property taxes to make up for the loss. He also mentioned the fact that property reevaluations are currently being done.

CHAPTER XXVI CODE OF ETHICS

SECTION I PURPOSE

The purpose of this code is to provide an educational tool and to establish guidelines and community expectations for the ethical standards of conduct for town officials, board members and employees. 11

- Town officials, board members and employees (defined as an elected town official, a
 volunteer appointed by the Town Council, and a person who is an employee of the
 Town, one who is paid for their service, but who is not an independent contractor
 individually and collectively know hereafter as Community Officials) shall act in the
 best interest of the town. 10
- Community Officials shall remove themselves from decision making if they have a conflict of interest. (A conflict is when a Community Official votes or acts on a matter in which they have a direct, immediate and definite personal and pecuniary interest, which is capable of being demonstrated.) 1,8
- Community Officials shall be impartial, and responsible to the community in their actions. 10.11
- The town's official decisions and policies shall be made through the proper channels
 of government as established by the Town Charter and Ordinances, and State Statutes.
- Public office, a volunteer position or town employment shall not be used for personal gain. 1,7,8,9,10

This code establishes guidelines and expectations regarding potential ethical issues, and it establishes a course of action for bringing complaints.

TOWN OF LONDONDERRY Adopted 01-21-08, Revised – Ordinance 2008-10, Title VI – Town Policy Ordinance 2014-04 – 09/08/14

- D. Immediate Family: "Immediate family" is defined for purposes of this policy to include spouse, civil union partner, children, parents, stepparents, stepchildren, brothers, sisters, half-brothers, half-sisters, immediate in-laws, grandparents, grandchildren, or other person living in the household of the prospective employee, Town employee, elected official, elected or appointed member of any Town board or commission, or Town Manager.
- E. Effective Date: The provisions of this policy shall become effective on passage by the Town Council and shall apply to all those elected, appointed or employed in any capacity by the Town after date of passage. The Town Manager shall take appropriate measures to limit the circumstances under which employees are supervised by members of their immediate family. To the extent such conflicts cannot be avoided, the Town Manager shall review and approve any performance evaluations, disciplinary actions, or changes in job status in order to assure that the public's interests are served.

SECTION III CODE PROVISIONS

A. No Conflicts of Interest

Community Officials of the Town shall avoid conflicts of interest. In such instances, you shall recuse yourself from discussion and decision-making. (Recusal means to remove yourself completely from all further participation in the matter in question.) 1,8

Community Officials or members of their families having professions outside their relationship with the Town that routinely do business with the Town of Londonderry shall not be awarded any work, of any value, except that it be done through a complete and open competitive procurement process. (Family is defined as a Community Official's lineal ascendants, lineal descendants, adoptions, siblings and offspring, a Community Official's spouse, the spouse's lineal ascendants, lineal descendants, adoptions, siblings and offspring, members of the same household, and participants in a Civil Union as defined under RSA 457-A.) 2,8,9

TOWN OF LONDONDERRY Adopted 01-21-08, Revised – Ordinance 2008-10, <u>Title VI – Town Policy</u> Ordinance 2014-04 – 09/08/14

CHAPTER XXVI CODE OF ETHICS (Cont'd.)

SECTION III CODE PROVISIONS (cont'd.)

B. A Duty to Recuse in Quasi-Judicial Actions

A "quasi-judicial action" is any action where the board or committee you are a member of is acting like a judge or a jury. For example, when your board or committee has a duty to notify the potential parties, hear the parties, and can only decide on the matter after weighing and considering such evidence and arguments as the parties choose to lay before you, you are involved in a quasi-judicial action. The work of the planning and zoning boards is largely quasi-judicial. Community Officials are expected to recuse themselves if a conflict exists or if they believe they cannot for any reason be totally fair and impartial. 1,9

C. A Duty to Disclose

As a Community Official, you shall make full disclosure and not participate in the conduct of business on behalf of the town or enter into discussion or deliberation of any matter if you have a financial interest, direct or indirect, in any planned or existing contract, job, work or service to be performed for the Town or voluntary sale to the Town of any land, materials, supplies, equipment or other property.₁₄

D. No Unfair Personal Use of Town Property

No Community Official shall use town property, services, or labor personally, or make the same available to others *unless* such use is available to other residents upon request on equal terms. 3,7,8

E. No Misuse of Confidential Information

No Community Official shall use any confidential information acquired by virtue of that individual's official position for personal benefit, or for the benefit of any other person or business. This does not apply to information which is readily available to the general public. 4.8.10

A newspaper publisher is the individual or organization responsible for overseeing the entire process of producing and distributing a newspaper. This includes managing the editorial team, overseeing budgets, making business decisions, and ensuring the financial success of the publication.

Here's a more detailed look at the role of a newspaper publisher:

Key Responsibilities:

Financial Management:

Managing the budget, ensuring profitability, and making decisions about advertising and subscriptions.

Leadership and Strategy:

Developing long-term vision and strategy for the publication, including its content, target audience, and market position.

Human Resources:

Hiring, training, and managing the staff, including editors, reporters, and sales personnel.

Business Operations:

Overseeing the day-to-day operations of the newspaper, including printing, distribution, and customer service.

Production:

Ensuring the quality and timeliness of the newspaper's content, including the news stories, features, and advertising.

Relationship with the Editor:

Collaborating with the editor on content direction and strategic decisions.

Hello, Mr. Butler.

You and I have had no direct contact before. Since January I've done part-time writing for the Londonderry Times and its two related papers. I am based in the Washington, D.C. area and work full time here. I once lived in New Hampshire for a year and worked for a small weekly paper. My beat included one of the local selectmen boards.

My company has worked remotely since the start of the pandemic. Under customary circumstances were I not at home I probably would not've taken on this part-time reporting. I have covered you both on council meetings and your role as liaison to the heritage commission. I think the first time was the meeting at which Kevin Smith introduced the topic of the editorial the paper publisher and your council colleague had just written. My story also included your very pointed comments about it.

Would you permit me to say you were absolutely on the mark about her at that time. I have been appalled by the unapologetic sloppiness with which she runs her papers, and her refusal to own up to what the real work situation is there. I'm not referring to aspects of the business apart from the writer's responsibilities. We are supposed to have some six writers according to the number of names on the emails sent out.

However, it's usually just three of us who seem to do stories. Then there is her continual and chaotic scrambling for more stories each week as she won't acknowledge how many writers she really has. She said we'd go to assigned beats in April and meet by Zoom every couple of weeks or so to go over stories. She's never made good on either of those. Having Zoom meetings would only show how few reporters she has.

She's under counted the number of stories I've had in the paper to pay me less. Almost more appalling is she has put my byline on someone else's story and then also put someone else's name on my story. She did that with a story I wrote on the PUC meeting about the water increase issue in Hampstead. Anyone who was on that meeting would know I covered it because I was asked to introduce and identify myself at the beginning. Members of the Hampstead water committee and their selectman liaison were also on the meeting.

I find it demoralizing and degrading to have an association, even one from a distance, with her. I've all but decided to give notice in June. I would just reiterate something from the council meeting where her editorial was discussed. You're quite right she does have an enormous conflict and her offer to have anyone write letters to the editor is hardly the same as her platform in having the paper. I wouldn't know, though might guess, how she is as a fellow council member. I don't know how much longer her term is. May the voters please rethink this situation by the next election.

I've liked the beat I've been on there and most of the issues I've covered. It is different doing it remotely from when I was there in person. That was 40 years ago and I've been reminded of that time this year. Even back then I was struck by the true local nature of New Hampshire town government, far different from anything I'd ever seen in Virginia where I grew up with the board of supervisors system. Virginia also doesn't allow any cities to be located within counties which I've always thought rather strange.

I salute people who get involved locally because they want to make a constructive contribution for their fellow citizens and are not driven by other interior or ulterior motives.

My family and I are taking a trip to your state at the end of June to see the lakes region where we haven't been before. "On Golden Pond" opened in theaters when I lived there. When our

son was a year and a half we took him on his first train ride on the cog railroad up Mt. Washington which I had once climbed. We look forward to coming as we haven't been away in the summer for two years.

My respect and best wishes to you.

John Seidenberg

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Budget story

I have thought over the past week about what occurred with the budget story and just wanted to add a few other comments if I could.

You may both be thinking along these lines already, but I hope it's possible at the next council and budget committee meetings to publicly discuss that story and the changes made to it from what I wrote and submitted, attributing remarks to Kevin you didn't make and that I didn't write. There is a calculated risk in writing for that newspaper because there can be no telling what changes -- significant major changes -- may be made to a story before publication. The two in charge apparently have free rein to do as they please.

It's even occurred to me that the publisher could use a statement, as "reported" in the paper, as an issue to run on for another term. In this particular case, though, Kevin, because you have the story as I wrote it from the budget meeting, any attempt to do that here should be shot down. I made it a point to save every story I wrote in case any issue ever subsequently arose. I had to send her stories again that I'd previously emailed that she had lost and of course I resent copies of what I wrote after she put someone else's byline on one of my stories and then put my name on a story by another writer.

All the while she struck me as considerably disorganized and having difficulty in keeping straight some actions of the Londonderry council of which she's a member in terms of her confusing instruction on town stories. How she could argue the paper isn't a vehicle for her, after she had inserted a letter to the editor ostensibly from her husband defending her and going after Jim Butler following their public dustup, is absurd. Her husband functions as the editor though may not have that specific title. That amounted to a letter to the editor from the editor. I wonder if could have directed that a letter in support the published forthwith. I doubt it.

She will cite illness, overwork, not having enough staff, her husband and daughter having other jobs, rushing to get to deadline or people not knowing the real her when mistakes appear in the paper. What happened with the budget story though amounts to falsification.

It's a relief not to have to contend with her further. I considered stopping a month sooner than I did after the earlier incidents. But I told her I'd write until the last week in June as she said she had to look for another writer and I was still working full time from home then.

In the interest of propriety, I hope if she's eligible to run again she will be vigorously challenged, and that justice may prevail. What happens with the paper is another matter. I only tried to so my best, regardless of who I was working for.

John, something I mentioned to you before and your observation on it prompted me to consider a factor I should've thought more about. It was related to my part-time work as a copyeditor on a publication owned by a longtime publisher in D.C. covering regulation, legislation, and legal rulings in the federal government. That company was bought by the Bloomberg news organization.

Michael Bloomberg had the company before he was mayor and turned over its operation while he was in office. What you and I talked about was when he ran for president, he instructed all

Bloomberg publications to not cover his campaign or any of the other candidates running. I was thinking in terms of short-circuiting coverage in his publications. But you pointed out Bloomberg had enough presence of mind to consider any coverage of him or the competing candidates in his publications might be questioned by readers for objectivity and he decided there would be no presidential candidate coverage. As his candidacy was not long in duration, the publications resumed coverage once he was out of the race.

But you got me to think about something there I hadn't sufficiently appreciated. Would that everyone who has responsibility for operating news publications think in terms of the public and not simply their personal interests.

I appreciated dealing with you and thank you for your professionalism.

John

Crazy stories

I wanted to tell you my presentation at work on New Hampshire's default budget system is set for the last week of this month. It will coincide with the end of the federal FY which is of interest to many people at our organization who closely follow the DoD and DHS budgets in assessing costs. Thank you again for speaking with me. I appreciated your perspective on the town's use of this budget tool.

This is more a school-related question but I just wondered if a name change was ever proposed for a school in the district whether that decision would ultimately be made by town voters? That issue has come up in areas where I live because this is the South and some schools were named for Confederate figures. But the decision about what to do was made by the school board.

Since I stopped writing for the LT I had the opportunity to learn of other ways in which Madam Paul has conducted herself in running the papers and treatment of staff. I understand there previously was another editor at the Nutfield News, not the unprofessional behavior was common, deciding to do stories based on who she had a grudge with or was jealous of, or simply based on conspiracy theories, not paying people, checks bouncing, her lack of concern about the level of work writers produced, and putting reporters in the strange position of covering town meetings where she would often speak sometimes yelling and crying. I had a taste of that with the council meeting where she and Jim Butler shouted at each other.

You probably are aware already of some if not most of these things. Something else odd was all the writers on the paper seemed to be independent contractors even if they were based in the region. I learned of the prior lawsuit that came about over the Pauls not paying the IRS tax being deducted from paychecks. I'll wait to see if I receive a W2 form next tax season. I found a story from around 2010 in the Derry News about the planning board ordering them to vacate

the building they were using for the newspaper offices. Strange that she's now a liaison there for the council.

When I talked to her before I started she told me which towns the paper covered and their size, and also what an awful paper the Derry News was. But she didn't utter one word about herself being on the council while also publishing the papers. I didn't know that until after I began. She had her husband fabricate comments Kevin didn't make about property taxes in the last story I wrote on the budget to get more people to read it because the story itself was too dull, she said. I wish she would've said that at the next council meeting for all to hear. When questioned about her actions, she has the same refrain about having cancer and being under attack. But she's never too ill to run for the council. Local journalism there will continue to be discredited as long as she has any connection to it. If she's still on it, may the town voters please wake up by the next time.

Thanks again for your time and my best wishes.

John Seidenberg

https://www.derrynews.com/news/local_news/nutfield-publishing-under-court-order-to-vacate/article 352f17f6-0b34-5e49-8388-2b4d3026faab.html

"I graduated with a major in psychology and a minor in biology. I hadn't ever really dove into running a paper," Paul said. "But, I got help from people around me and learned a lot fast." (Salem State has no record of graduation)

https://www.lancerspiritonline.com/28722/features/woman-to-watch-march-28-deb-paul/

https://www.derrynews.com/litchfield-road-property-eyed-for-historic-upkeep/article_c014784b-c1f0-5416-8bb3-3a9facf06425.html

https://www.doj.nh.gov/news-and-media/newspaper-publisher-debra-paul-found-guilty-election-law-violations

https://www.newscentermaine.com/article/news/crime/new-hampshire-newspaper-publisher-found-guilty-of-political-advertisement-omissions/97-708c4c8f-9529-4a2e-99c2-33cc3d1bc780

https://www.derrynews.com/news/londonderry/londonderry-times-publisher-must-pay-620-in-fines/article f0f90242-8b3d-5b7d-97ca-ba79791832e5.html

https://pressfreedomtracker.us/all-incidents/new-hampshire-newspaper-publisher-arrested-charged-with-violating-political-ad-laws/

Article shows warned multiple times while a sitting Town Councilor.

https://www.newsday.com/news/nation/publisher-arrested-political-ads-new-hampshire-t17436

https://www.boston.com/news/crime/2022/08/25/new-hampshire-publisher-debra-paul-arrested-londonderry-times/

Arrested while serving on the Town Council never voluntarily reported to the public or the Town Council.

https://www.reddit.com/r/newhampshire/comments/1euesi8/londonderry_whats_going_on/

https://www.eagletribune.com/news/new_hampshire/nutfield-publishing-owes-163k-to-irs/article_1c29d2c8-0ec6-5fa1-8e9d-b6624b4ec2c4.html 163K Payroll-taxes

https://www.derrynews.com/news/londonderry/publisher-criticizes-town-decision-on-legal-notices/article_e74018ed-0af4-5805-aa18-328693605aac.html

Ending Public Notices

https://cmsarchive.civicplus.com/LondonderryNHArchive/londonderrynharchive.vt-s.net/Pages/LondonderryNH_MinAgArchive/LondonderryNH_ZoningMin/p2018/6.%20%20ZBA%20 June%2020%202018%20(A).pdf

ZBA Decision only 300 Square feet

Elect Deb Paul for Londonderry Town Council?? Why should voters trust her after:

- 1. She owed the IRS \$163k for failing to pay them the taxes she withheld from her employee payroll.
- 2. She was convicted of a misdemeanor by the State of NH for election law violations.
- 3. She was sued by her printing vendor and found by the Court to owe \$46k+ to them.
- 4. She was found to plagiarize her editorials more than once.
- 5. She settled with the Town to offer free ads in lieu of paying penalties for violating building permits.

Not to mention how unethical it is that you're running for public office as the owner/editor of the local paper. And we all know there's so much more.

What does pecuniary mean in legal terms?

In law, pecuniary is defined as something that relates to money or property. Pecuniary is also used synonymously with the word financial.

Pay to Play term - relating to or denoting an unethical or illicit arrangement in which payment is made by those who want certain privileges or advantages in such arenas as business, politics, sports, and entertainment:

Legal ads

https://bloximages.chicago2.vip.townnews.com/derrynews.com/content/tncms/assets/v3/editorial/2/74/274c6a88-608f-11e9-896a-af590b24abb3/5cb649f4de6de.pdf.pdf

Deb Paul is the publisher of the *Londonderry Times*, a free weekly community newspaper that she started and on which she works with her husband. Controls the weekly content Conflict of interest

"When I moved there was no paper and I didn't understand how things worked.

"We voted down something and the next thing I know, they're building it. Everybody voted down a power plant and the next thing I know we had a power plant. False statement I didn't understand and I figured if I didn't understand, other people must not understand," she explains.

The Londonderry Times was one of four papers Deb founded over 20 years ago, two of which were shut down during Covid, and has moved from monthly to fortnightly and finally, weekly distribution. Claimed as recently as April 2025 they ran 4 newspapers

They are free mailed to everyone because information should be free," she says. "We've made a lot of changes and we keep an eye on things. The government hates us but the residents love us." Conflict of Interest

"We have 70 acres up in the north part of Londonderry that is called the Musquash. It's conservation land and they have what look like houses that are built on the ground, almost like out of a nook, kind of Hobbit looking," says Deb. (the Musquash is over 1000 acres) 800 acres is Town own land.

"As a matter of fact when I was a town councillor I tried to initiate a sister city programme with you guys in Londonderry with us," says Deb. No record of this happening misstatement

"It fell through the cracks, [but] I'm going to try it again. Once we have elections in March, I'm going to bring it up to see if we can engage in that again."

PublisHed in IRE (AN)

Lyme rage" refers to the experience of acute, intense episodes of rage and potential violent behavior that some individuals with Lyme disease report. This can include a sudden onset of extreme anger, often with limited cognitive control. While not universally experienced, these episodes can be a significant symptom of Lyme disease, and it's important to consult with a doctor if you are experiencing such symptoms.

Flaboration:

Lyme Disease and Personality:

Some experts believe that Lyme disease can affect personality and brain function, potentially leading to changes in mood and behavior.

Neuropsychiatric Symptoms:

Lyme disease can cause various neuropsychiatric symptoms, including mood swings, irritability, and cognitive difficulties.

Can Lyme disease change personality?

The Impact of Lyme Disease on Mental Health: Understanding ...

Dementia: Lyme disease can cause neurological issues leading to memory loss, confusion, and changes in personality or mood. Some research discovered that Lyme disease can lead to a quickly advancing form of dementia that primarily affects the frontal region of the brain

Most aggression with LD was impulsive, sometimes provoked by intrusive symptoms, sensory stimulation or frustration and was invariably bizarre and senseless. About 9.6% of LD patients were homicidal with the average diagnosis delay of 9 years. Postinfection findings associated with homicidality that separated from the non-homicidal group within the 95% confidence interval included suicidality, sudden abrupt mood swings, explosive anger, paranoia, anhedonia, hypervigilance, exaggerated startle, disinhibition, nightmares, depersonalization, intrusive aggressive images, dissociative episodes, derealization, intrusive sexual images, marital/family problems, legal problems, substance abuse, depression, panic disorder, memory impairments, neuropathy, cranial nerve symptoms, and decreased libido. Seven LD homicides included predatory aggression, poor impulse control, and psychosis. Some patients have selective hyperacusis to mouth sounds, which I propose may be the result of brain dysfunction causing a disinhibition of a primitive fear of oral predation.

LD and the immune, biochemical, neurotransmitter, and the neural circuit reactions to it can cause impairments associated with violence. Many LD patients have no aggressiveness tendencies or only mild degrees of low frustration tolerance and irritability and pose no danger; however, a lesser number experience explosive anger, a lesser number experience homicidal thoughts and impulses, and much lesser number commit homicides. Since such large numbers are affected by LD, this small percent can be highly significant. Much of the violence associated with LD can be avoided with better prevention, diagnosis, and treatment of LD.

Neurosyphilis is a serious complication of syphilis where the infection spreads to the brain and central nervous system. It can cause a range of symptoms affecting the nervous system, including difficulties with movement, memory, and thinking, as well as mood and mental health issues. Neurosyphilis can manifest in different forms, each with its own set of symptoms, and can develop at any stage of syphilis, including early stages.

Symptoms:

Abnormal walk or difficulty walking: Neurological damage can affect balance and coordination.

Numbness in extremities: Nerve damage can cause sensory disturbances.

Memory and thinking problems: Cognitive function can be impaired.

Mental health problems: Depression, irritability, and even psychosis can occur.

Vision problems: Ocular syphilis, a related condition, can affect vision.

Hearing problems: Otosyphilis, another related condition, can affect hearing.

Other symptoms: Headaches, stiff neck, seizures, and mood swings are also possible.

Early symptoms include mood disturbances such as irritability, personality changes, alterations in sleep habits, and forgetfulness. Late symptoms include labile mood, memory and judgment impairment, confusion, depression, agitation, psychosis, delusions, and seizures.

What are the mental illness symptoms of syphilis?

It can cause psychiatric disorders including-depression, mania, psychosis, personality changes, delirium and dementia. With the introduction of penicillin into practice, the number of cases with syphilis decreased and its incidence increased with AIDS and HIV seropositivity.

Can syphilis brain damage reversed?

Without treatment, syphilis can lead to damage throughout the body. Syphilis also raises the risk of HIV infection and can cause problems during pregnancy. Treatment can help prevent damage. But it can't repair or reverse damage that's already happened.

Syphilitic dementia, also known as general paresis or neurosyphilis, is a form of dementia caused by the bacteria Treponema pallidum infecting the brain. It's a late-stage complication of untreated syphilis, typically occurring 10 to 30 years after the initial

infection. Symptoms can include memory loss, impaired judgment, confusion, mood swings, and personality changes.

Early Symptoms:

Irritability, Forgetfulness, Personality changes, Changes in sleep habits, and Mood disturbances.

Deb Paul has made the statement publicly to all who would listen that she suffers from this disease and from lesions in her brain.

- A. Public Officials and Boards: No person serving as an elected official, an elected or appointed member of any Town board or commission, or as Town Manager, shall participate in, appoint or vote on the appointment or hiring of any person in his/her immediate family to a position as a Town employee. If a prospective employee is a member of the immediate family of any elected official, elected or appointed member of any Town board or commission, or Town Manager, that elected official, elected or appointed member of any Town board or commission, or Town Manager, shall remove himself/herself completely from the appointment process. Compliance with this provision shall be a condition of holding office pursuant to Article 6 of the Town Charter.
- B. Employment of Family Members of Current Employees: Any job applicant seeking employment with the Town or applicant for an appointed position on a Town board or commission shall be required to disclose immediate family relationships with existing employees, elected officials, and appointed board or commission members.
 - No Town employee shall take part in the hiring process of any member of the employee's immediate family who is seeking employment with the Town. Additionally, except when necessary in the course of daily operations within a department, no Town employee shall evaluate, supervise, or discipline any member of the employee's immediate family who is currently an employee of the Town. If an employee has an immediate family member in his or her chain of command, except when necessary in the course of daily operations within a department, the immediate family member shall take no part in the evaluation, supervision or discipline of that employee, with those responsibilities to be performed by the next highest person in the chain of command.
- C. Town Councilors and Town Manager: To avoid any actual or perceived conflict of interest in the awarding of business and contracts with the Town, no person serving as a Town Councilor or Town Manager shall take part at any stage in any negotiations, or vote on any contract or agreement between the Town and any individual or entity in which he/she or his/her immediate family has any direct or indirect financial or gainful interest, however small. Compliance with this provision shall be a condition of holding office pursuant to Article 6 of the Town Charter.

Letters

Continued from page 16 trustee on March 11.

Christine Patton Londonderry

What's Important To the editor.

Local journalism like that provided by the Londonderry Times is profoundly important in a democratic society. I respect the work that the staff of the Londonderry Times does under Deb Paul's leadership, but that is precisely the reason why I cannot support her candidacy for town office. I do not question the assertions made in these pages by Ms. Paul and her supthis town and wishes to serve it. However, serv-

ice in such a prominent elective office is fundamentally incompatible with Ms. Paul's journalistic obligations.

By virtue of being a candidate while simultaneously serving as owner/publisher of this newspaper, Ms. Paul calls into question the fairness of the local political coverage of the Londonderry Times. How can I trust the reporting of this outlet on local government affairs when its leader is a candidate for office? Voters who sincerely seek information suffer from any media outlet becoming a partisan mouthpiece rather than a trustworthy source of facts.

Ms. Paul and her supporters that she loves this town and wishes to serve it. However, serv-

that must inevitably arise if she is elected. The greatest danger comes from the Londonderry Times losing its ability to act as a watchdog in covering decisions on which Ms. Paul's position succeeds. A local newspaper should always maintain a skeptical eve on the actions of all municipal officials, looking out for possible conflicts of interest and/or acts of negligence. How could the Londonderry Times do that if its owner/publisher is one of the officials making the decisions?

Though I don't know Deb Paul (or any other candidate for Town Council) on a personal level, I respect her obvious dedication to this community. Nevertheless, I won't be voting for her. By running this newspaper, Ms. Paul performs an admirable service for the people of London-derry. For the press to serve its function properly, it must be able to operate at arm's length from the government that it seeks to hold accountable. That can't happen with Deb Paul on the town council.

Edward MacKenzie Londonderry

MR. AMCKENZIE GOT THIS 100% CORRECT

DEB PAUL BLATANTLY WORKS TO

CONTROL THE STORYLINE AND MESSAGE

TO THE COMMUNITY

SEE EXPAMPLES & ATTACHED PRESENTATION

SENT TO TOUR MANAGER

Planning/Counci

continued from page 1

dance. Town Council on the same page so Chair Ron Dunn attend- everybody's working in ed part of the meeting, the same direction but had to leave before instead of two ships member the joint discussion passing in the night," began. Faber said he Butler said. spoke with Town Counof time and was told elected Town Councilor Deb Paul was out of town.

for the first time ever and have a real converhappen," Butler said.

He noted that issues where the two boards

said.

during a recent Town ward." Council meeting, memsuch as limiting development, and he had hoped to begin a dialogue about how the Planning Board could support those efforts.

lacked a quorum at the it's your authority," he workshop, Butler said they could not gather a comprehensive from the council, adding that he understood a week's notice may have June, with meetings been short. .

"I want to get us all

Bouchard said he cilor Ted Combes ahead believes it would make sense to schedule a effective tool," he said. Combes would not be joint meeting after a able to attend. Newly new Town Manager is hired.

During public comformer Town ment. "What I want is for Councilor John Farrell two boards to get in line suggested that the Planning Board does not necessarily need Town sation of what needs to Council input to move forward.

"You're greatly unlike traffic are areas derestimating as the when Planning Board how could work collabora- much power you have. You don't need the What I want to see Town Council, You have meeting, is a way that it's going the tools today. It's to get fixed," Butler called the CIP," Farrell said. "That's your Butler added that strategic plan to go for-

> He explained that outlined goals the Planning Board can present its plan through the Capital Improvement Plan (CIP).

"The CIP is one of the strongest tools you have and it's underuti-Because the council lized and it's your tool,

Assistant Town Manview ager Kellie Caron said the CIP process typically begins in May or scheduled later in the

year.

She noted thev could explore ways to incorporate general traffic improvements into the CIP.

' Planning Board Jeff Penta agreed that the CIP could be an effective mechanism.

"I think that's an

Butler emphasized that collaboration with the Town Council remains important to achieving goals.

"I agree with that. I think everybody working together you can get (more accomplished)," Bouchard said.

No date was set for the Planning Board and Town Council will meet jointly.

Reached after the Paul Deb explained that she had a family trip planned weeks before the meeting had been disclosed.

"Had I known this meeting was taking place, I may have been able to reschedule, but I was half-way across the country the night of the meeting," Paul said.

She added. "I'm looking forward to helping to make some significant changes in controlling growth in the upcoming months, but until the new Town Manager begins in June. I feel our efforts will be a bit premature."

THE TIMES
THE PUBLISHER
THE FACT.
THE FACT.
CONTROL OF
THE MESSAGE
AND STORYLINE

Master Plan

Continued from page 1 that NH has to come up with 60,000 new homes by 2030. Well, no one town and no one region is going to be able to supply that."

Committee member Bob Robicsek argued that subsidized housing was the only affordable solution, an option that would almost certainly require state and federal support to be effective.

"Unless you have federally subsidized housing, the market is going to dictate what people build, because developers build to make to make money," said Robicsek. "I struggle with this, but it's not up to Londonderry to solve everybody's hous-

ing option."

Committee Chair Jeff Penta agreed, saying the matter was "out of our purview" beyond advocating for new laws and removing regulatory roadblocks on a "macro level."

The Steering Committee's focus remained on finding different housing types, a strategy that attracted some criticism.

"What are we missing for diversity in our housing market?" asked resident Deb Paul. "We have apartments, high-density apartments, luxury apartments, condos, rental houses, regular houses, big houses, and little houses, we even have some trailer parks, so what is missing?"

She argued the town already has extensive housing diversity without much impact on prices, and a vaguely written Master Plan might encourage developers to start new projects without regard for existing Londonderry residents. She said, "We need to be

very careful about the words we use, so choose wisely, because developers could use those words against us in a way not intended."

After some debate, the Steering Committee agreed to focus the regional context more on housing availability, not affordability.

The next meeting of the Master Plan Steering Committee is set for Thursday, April 17, at 6 p.m. in the Moose Hill Council Chambers.

DOZEN'S OF EXAMPLE EXIST, ALMOST.

ON A WEEKLY BASIS THE BLAVANTY OBVIOUS

BIAS TO TELL THE PUBLISHER'S

VERSION OF THE TRUTH OCCURS

THIS IS A OVERWHELMIN'S CONFLICT OF INTERES

Editorial

There are three sides to every story. Theirs, Yours, and the Truth

Facts are Facts. They are static, not changing based on our opinion or interpretation.

Unfortunately, when telling a set of facts to another, we inevitably do so in narrative form. We present the facts, but it is our understanding or interpretation of them, not necessary the truth. This personal bias is human nature; it is unavoidable, often subconscious, and there are many influences that affect someone's view of an event.

In my profession you have to be inquisitive. Getting the facts involves listening to people's narratives, and being a puzzle master, finding pieces that fit together to give the public the most comprehensive view of a story.

Because life is not black or white, but often a shade of gray, the way we communicate events to one another often falls into the gray. This differs from the newspaper, which should be just the facts, absent emotion or opinion, which is a challenge.

AND THE

Whenever someone tells a story, it's through their perspective and how they experience it, and any narrative is bound to have a slight variation on the absolute truth. Parties on different sides of an issue often have grounds to feel wronged, have a need to be heard, or a worry of feeling unheard. It is best to gather as many sides as

possible before one makes conclusions.

Lately, at public meetings we have heard references to "controlling the narrative". There is a persistent trend in our community in which a set of facts or issue arises that is perhaps unpleasant. Instead of the powers that should be tackling these issues, they attempt to "control the narrative", to minimize the unpleasant nature. They do so in seemingly innocuous ways; their narratives appear reasonable, but when examined closely, do not bear up as accurate.

Set emotion aside when listening to the often-charged conversations that occur at public meetings. How we feel about things matters less than having a clear understanding of what actually happened. Let's avoid being guilty of "Controlling the Narrative" and avoid putting words into others mouths, making assumptions, or omitting important facts that change the whole story.

At the end of the day, no one is telling you the absolute truth, they simply cannot. There are always many sides or perspectives to the story. The best things one can do is examine the facts and determine the truth for themselves. It is only then that the truth begins to take shape. The truth has a way of getting out eventually!

PUBLISHERS OWN WEDSS

NO ENE TEUS THE THUTH " EQUALS

NO MORAL COMPASS - IS SOMEONE

NO MORAL COMPASS - IS SOMEONE

NO MORAL COMPASS - IS SOMEONE

https://www.derrynews.com/news/local_news/nutfield-publishing-under-court-order-to-vacate/article_352f17f6-0b34-5e49-8388-2b4d3026faab.html

"I graduated with a major in psychology and a minor in biology. I hadn't ever really dove into running a paper," Paul said. "But, I got help from people around me and learned a lot fast." (Salem State has no record of graduation)

https://www.lancerspiritonline.com/28722/features/woman-to-watch-march-28-deb-paul/

https://www.derrynews.com/litchfield-road-property-eyed-for-historic-upkeep/article_c014784b-c1f0-5416-8bb3-3a9facf06425.html

https://www.doj.nh.gov/news-and-media/newspaper-publisher-debra-paul-found-guilty-election-law-violations

https://www.newscentermaine.com/article/news/crime/new-hampshire-newspaper-publisher-found-guilty-of-political-advertisement-omissions/97-708c4c8f-9529-4a2e-99c2-33cc3d1bc780

https://www.derrynews.com/news/londonderry/londonderry-times-publisher-must-pay-620-in-fines/article_f0f90242-8b3d-5b7d-97ca-ba79791832e5.html

https://pressfreedomtracker.us/all-incidents/new-hampshire-newspaper-publisher-arrested-charged-with-violating-political-ad-laws/

Article shows warned multiple times while a sitting Town Councilor.

https://www.newsday.com/news/nation/publisher-arrested-political-ads-new-hampshire-t17436

https://www.boston.com/news/crime/2022/08/25/new-hampshire-publisher-debra-paul-arrested-londonderry-times/

Arrested while serving on the Town Council never voluntarily reported to the public or the Town Council.

https://www.reddit.com/r/newhampshire/comments/1euesi8/londonderry_whats_going_on/

https://www.eagletribune.com/news/new_hampshire/nutfield-publishing-owes-163k-to-irs/article_1c29d2c8-0ec6-5fa1-8e9d-b6624b4ec2c4.html 163K Payroll taxes

https://www.derrynews.com/news/londonderry/publisher-criticizes-town-decision-on-legal-notices/article_e74018ed-0af4-5805-aa18-328693605aac.html

Ending Public Notices

https://cmsarchive.civicplus.com/LondonderryNHArchive/londonderrynharchive.vt-s.net/Pages/LondonderryNH_MinAgArchive/LondonderryNH_ZoningMin/p2018/6.%20%20ZBA%20 June%2020%202018%20(A).pdf

ZBA Decision only 300 Square feet

Elect Deb Paul for Londonderry Town Council?? Why should voters trust her after:

- 1. She owed the IRS \$163k for failing to pay them the taxes she withheld from her employee payroll.
- 2. She was convicted of a misdemeanor by the State of NH for election law violations.
- 3. She was sued by her printing vendor and found by the Court to owe \$46k+ to them.
- 4. She was found to plagiarize her editorials more than once.
- 5. She settled with the Town to offer free ads in lieu of paying penalties for violating building permits.

Not to mention how unethical it is that you're running for public office as the owner/editor of the local paper. And we all know there's so much more.

What does pecuniary mean in legal terms?

In law, pecuniary is defined as something that relates to money or property. Pecuniary is also used synonymously with the word financial.

Pay to Play term - relating to or denoting an unethical or illicit arrangement in which payment is made by those who want certain privileges or advantages in such arenas as business, politics, sports, and entertainment:

Legal ads

https://bloximages.chicago2.vip.townnews.com/derrynews.com/content/tncms/assets/v3/editorial/2/74/274c6a88-608f-11e9-896a-af590b24abb3/5cb649f4de6de.pdf.pdf

Code of Ethic's Complaint

Behavior of Councilor Paul at the April 25 2025 Recreation Commission meeting

- The abhorrent and abusive behavior of an employee Doug Cole during the meeting starting at approximately 23-24 minute of the recording.
- Violation of section 4.8 non interference
- Violation of 6.2.b The person so financially interested in such matters or transactions shall not vote or advise on or otherwise participate in the Town's and Council's consideration of such matter or transaction. (The entire conversation and comments were driven for personal gain)
- Violation 6.7 Mis use of Information (Using the influence of the newspaper for you own personal gain)
- 8.12 Prohibition for the abusive behavior towards an employee
- 8.11 Indemnification: The constant excuse for this behavior has been Lyme rage invoked by Councilor Paul. This was also cited to staff after the meeting. See the attached description of the violent nature of this behavior. Has this section been waived by Debra Paul due to an uncontrollable medical condition. Has this condition been disclosed to Primex? The town's insurance carrier. Has Ms. Paul signed a hold harmless statement indemnifying the town of Londonderry from this behavior? Has this condition been disclosed to the Staff, Town Council and the voters?

If none of this has happen; why not? At a minimum a public reprimand and public apology to Doug Cole needs to happen.

Lyme rage" refers to the experience of acute, intense episodes of rage and potential violent behavior that some individuals with Lyme disease report. This can include a sudden onset of extreme anger, often with limited cognitive control. While not universally experienced, these episodes can be a significant symptom of Lyme disease, and it's important to consult with a doctor if you are experiencing such symptoms.

Elaboration:

Lyme Disease and Personality:

Some experts believe that Lyme disease can affect personality and brain function, potentially leading to changes in mood and behavior.

Neuropsychiatric Symptoms:

Lyme disease can cause various neuropsychiatric symptoms, including mood swings, irritability, and cognitive difficulties.

Can Lyme disease change personality?

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Dementia: Lyme disease can cause neurological issues leading to memory loss, confusion, and changes in personality or mood. Some research discovered that Lyme disease can lead to a quickly advancing form of dementia that primarily affects the frontal region of the brain

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