

**Affidavit in Support of Citizen Complaint**

A Citizen of the State of New Hampshire  
Daniel Richard  
Complainant-Affiant

V.

Wrongdoer  
Christopher T. Sununu,  
Acting in his official capacity as Governor

**CRIMINAL COMPLAINT AFFIDAVIT**

I, Daniel Richard, a private Citizen of the State of New Hampshire, bring this criminal complaint under the New Hampshire common law for fraud (New Hampshire Constitution, Part II, art. 90 and “An Act relating to Attornies,” passed by the legislature on February 17, 1791 that citizens of this State may appear, plead, pursue, or defend in any cause, prosecution, or suit within this State).

The Affiant brings a criminal complaint against Christopher T. Sununu, acting as Governor, for assuming undelegated powers under the color of law by issuing Executive Orders and Emergency Orders through statewide media, i.e., (WMUR), local newspapers, the state website (PDF downloads), and local law enforcement, in order to induce the belief that he may exercise powers undelegated to the Governor over private businesses and private persons by quarantining a healthy population and locking down the State, in direct violation of the probable cause requirement of the government and the due process rights of the people during a declared state of emergency involving a public health “epidemic” as defined in RSA 21-P:35 V and as codified in the Public Health Emergency Management Powers RSA 21-P:53 and RSA 141-C. Said Executive Orders and Emergency Orders have the appearance of executive authority, claimed

under emergency management powers statutes for public safety (RSA 4:45 and RSA 4:47), in order to induce the belief that they have the force of law. Said Public Health Emergency Management Powers statutes remain in full force and effect under the New Hampshire Constitution, Part II, art. 90 **[Existing Laws Continued if Not Repugnant]:**

*“All the laws which have heretofore been adopted, used, and approved, in the Province, colony, or State of New Hampshire, and usually practiced on in the Courts of Law, **shall remain and be in full force, until altered and repealed by the Legislature;** such parts thereof only excepted, as are repugnant to the rights and liberties contained in this Constitution:”*

As such, he did and continues to interfere with the Affiant’s inherent right to enjoy and defend life, liberty—acquiring, possessing, and protecting property—and, in a word, of seeking and obtaining happiness (New Hampshire Constitution, Part I, art. II).

Also, the Governor’s Orders, Executive Order 2020-04 of 03/13/2020 and Emergency Order #2 of 03/16/2020, enforced as law, subject the Complainant to laws not consented to by the people or their representative body, and violate the Affiant’s rights under the New Hampshire Constitution, Part I, art. XII **[Protection and Taxation Reciprocal]:**

*“**Nor are the inhabitants of this State controllable by any other laws than those to which they, or their representative body, have given their consent**”*

Therefore, such a violation is punishable under Title LXII of the criminal code and codified by statute NH RSA: 638:14 (Unlawful simulation of the legal process, a Class B misdemeanor under RSA 625:9 IV. (c.).

## JURISDICTION

1. **RSA 592 A:7** provides that a criminal proceeding before a district of municipal court begin when a complaint is filed with the court.

2. **Criminal Law—Generally—Private Prosecutions**

Because the legislature has never limited the initiation of the criminal process to public prosecutors, private prosecution continues to exist as a matter of common law so long as they are not “repugnant to the rights and liberties” contained in the Constitution. (New Hampshire Constitution, Part. II, art. 90 and *State v. Martineau*, 808 A.2d 51, 148 N.H. 259 (N.H., 2002).).

## RELEVANT FACTS

3. WHEREAS, on March 13, 2020 Governor Christopher T. Sununu exercised undelegated powers by signing Executive Order 2020-04 and claimed that he may assume authority over private citizens and private businesses, in direct violation of his duty and obligations under the New Hampshire Constitution, Part II, art. 50 and NH RSA 4:45 III(a) “to enforce all laws, regulations relating to emergency management” during a declared state of emergency because of a public health epidemic. Sununu acted under the color of law by invoking RSA 4:45 and NH RSA 4:47 as his authority over private citizens and private businesses. Said statutes are void of any such authority, as such public health emergency management powers reside in RSA 21-P:53 and RSA 141-C. In addition, the New Hampshire Constitution, Part II, art. 90, establishes that all laws “**shall remain and be in full force, until altered and repealed by the Legislature.**” Therefore, said orders are a direct violation of RSA 638:14. Each

subsequent Executive Order constitutes a new violation; consequently, all the following Executive Orders are fruits of the poisonous tree;

4. WHEREAS, on March 16, 2020 Gov. Sununu, under the color of Emergency Order #2 and pursuant to Executive Order 2020-04, suspended the rights of private businesses and private persons, in direct violation of his duty and obligations under the New Hampshire Constitution, Part II, art. 50, and NH RSA 4:45 III(a) “to enforce all laws, regulations relating to emergency management.” Each subsequent Emergency Order constitutes a new violation; consequently, all the following Emergency Orders are fruits of the poisonous tree;
5. WHEREAS, the state statutes for Emergency Management Powers and the Constitution of N.H. delegate to the Governor specific and limited enumerated powers during a state of Emergency;
6. WHEREAS, the police power of the State lies with the legislature to manage an epidemic of infectious disease and was enacted by the legislature of this State. Such was the same in *Jacobson v. Massachusetts*, 197 U.S.11 (1905) and is codified in the following PUBLIC HEALTH EMERGENCY MANAGEMENT POWERS related statutes:
7. WHEREAS, RSA 4:45 (I.) defines State of Emergency in RSA 21-P:35 (VIII);
8. WHEREAS, RSA 21-P:35 (V.) definitions include epidemic;
9. WHEREAS, RSA 21-P:53 defines the Public Health Emergency Management Powers of the state; and
10. WHEREAS, RSA 21-P:53 establishes the powers and duties of the commissioner of Health and Human Services, subject to the direction and control of the governor, which are in addition to those set forth in RSA 141-C;

11. WHEREAS, RSA 141-C incorporates the probable cause obligations of the state and the due process rights of citizens during an epidemic of infectious disease;
12. WHEREAS, all the aforesaid statutes “**shall remain and be in full force, until altered and repealed by the Legislature.**” (The New Hampshire Constitution, Part II, art. 90).

### **GOVERNOR SUNUNU’S ACTIONS**

13. WHEREAS, Governor Sununu issued Executive Order 2020-04 on March 13, 2020 and stated that he had knowledge of COVID-19 in December of 2019, at least 30 days prior to the World Health Organization’s declaration of a Public Health Emergency of International Concern of January 30, 2020. He established that local state Health and Human Services were to monitor and plan for the potential spread of COVID-19;
14. WHEREAS, Executive Order 2020-04 is written and signed by the Governor approximately two and one-half months after he attained knowledge of a possible epidemic of an infectious disease that may spread to N.H., as detailed by the Order;
15. WHEREAS, Governor Sununu, with the benefit of legal counsel, Atty. John Formella; the Attorney General Gordan MacDonald; and the Solicitor General Daniel Will, did plan, over a two-month period, a legal strategy codified in the Governor’s Executive Orders and Emergency Orders. Said Orders are evidence of mens rea, as statutes RSA 4:45 (State of Emergency Declaration; Powers) and RSA 4:47 (Emergency Management Powers) relied upon by the Governor

do not provide the power to command authority by Executive fiat over private businesses and private persons, as such action violates by design the separation of powers of the New Hampshire Constitution, Part I, art. XII; Part I, art. XXIX; Part I, art. XXVII; and Part II, art. 90;

16. WHEREAS, Governor Sununu issued Emergency Order #2 on 03/16/2020, beginning the lockdown of a healthy population (depriving the Affiant of the right to assemble and to conduct commerce) and the lockdown of private businesses, in direct violation of the Affiant's (and the citizens of this State) rights protected by RSA 141-C:14-a (Due Process during a declared state of emergency for public health). RSA 21-P:53 (Public Health Emergency Management Powers) establishes that the Commissioner of Health and Human Services and the Governor are bound by RSA 141-C:14-a (I), which states that any Order for isolation or quarantine during a public health emergency "epidemic" of infectious disease is entitled to due process under said statute;
17. WHEREAS, Governor Sununu issued Emergency Order #63, which required ineffective face coverings. The Governor deployed state agents who, under the color of law, threatened businesses with legal action and fines for not enforcing his illegal mandates, which caused great anxiety and conflict to the Affiant and local businesses. This tyranny continues to this day;
18. WHEREAS, Governor Sununu issued Executive Order 2020-06 on 04/16/2020, citing RSA 21-P:35 V as his authority. Invoking RSA 4:45 and RSA 4:47 requires the Governor to faithfully enforce RSA 4:45 III(a) "To enforce all laws," which would include Public Health Emergency Management Powers RSA 21-P:53 and

the public health laws in RSA 141-C, which were enacted by the legislature for an epidemic of infectious disease;

19. WHEREAS, the Governor's issue of Emergency Order #65 on 08/13/2020 is evidence of fraud and conspiracy to commit fraud before the Binford Court of 03/19/2020 (Case No. 217-2020-CV-00152), by acknowledging that RSA 141-C has longstanding authority relating to public health when Attorney Daniel Will told the Binford Court, "**and none of the provisions of RSA Chapter 141-C therefore apply to this case.**" Yet, Order #65 publicly states that the provisions do apply. The Governor omits his duty from the Order, required by RSA 21-P53, which compels his performance under 141-C. This Order is the first mention of RSA 141-C in any of the Executive or Emergency Orders. RSA 141-C is never suspended by any of the proceeding Orders, and this Order is evidence that it is still in full force and effect. This Order is a public confession of the knowledge of RSA 141-C and mens rea to deceive the court and the Affiant (and the citizens of this State);

20. WHEREAS, the Governor issued Emergency Order #69 on 09/16/2020 and established an ethics committee under RSA 141-C:27 as his authority. Again, this Order is a public confession of the knowledge of RSA 141-C and mens rea to deceive the court and the Affiant (and the citizens of this State). Remember, Attorney Daniel Will told the Court, "**and none of the provisions of RSA Chapter 141-C therefore apply to this case,**" when Order #69 now publicly states that they do apply;

21. WHEREAS, the Governor may have the statutory authority to declare a state of emergency; however, a declaration of an emergency under RSA 4:45 requires the state (the Commissioner of Health and Human services and the Governor) to exercise the powers delegated by the legislature. During an epidemic of infectious disease, authority resides in the Public Health Emergency Management Powers statutes RSA 21-P:53 and RSA 141-C, where the state (the Commissioner of Health and Human services and the Governor) may exercise authority over private businesses and private persons and not in RSA 4:45 or RSA 4:47. The Governor's omission of RSA 21-P:53 and RSA 141-C from his Executive Orders and Emergency Orders constitutes fraud by omission with the purpose to procure the compliance of the people (and the Affiant) and, with no constitutional or statutory authority to do so, the Governor enforced said orders as law;
22. WHEREAS, the Governor conspired with others—mens rea evidenced by the objection of the state in Case No. 217-2020-CV-00152 *Binford v State*—as the Governor's defense of the Executive Orders and Emergency Orders before the Binford court constitutes conspiracy to commit fraud, fraud by omission, and intent to commit fraud on the Court;
23. WHEREAS, Atty. Daniel Will argued before the Binford Court, as well as subsequent cases, that both Emergency Order 2020-04 and Executive Order #2 are constitutional; yet he never develops his argument, nor does he cite any constitutional authority or relevant case law to substantiate his claims because no such constitutional or statutory authority to suspend the Constitution of New

Hampshire exists. As such Emergency Management Powers are already delegated to the Governor by the legislature in statute RSA 21-P:53 and RSA 141-C, as well as under the New Hampshire Constitution, Part II, art. 90, they are in full force and effect until they are repealed by the legislature;

24. WHEREAS, Daniel Will intentionally misled the Binford Court when he made the following statement before the Court:

***“The Governor has broad power during emergencies to take critical steps to protect the public under RSA 4:45 and RSA 4:47. The exercise of these powers does not arise under RSA Chapter 141-C, as the plaintiffs appear to allege, and none of the provisions of RSA Chapter 141-C therefore apply to this case.”;***

25. WHEREAS, Daniel Will’s first sentence, ***“The Governor has broad power during emergencies to take critical steps to protect the public under RSA 4:45 and RSA 4:47,”*** is deliberately misleading. The Governor has specific enumerated powers, as stated in Executive Order 2020-04 and detailed in the existing Emergency Management Powers statutes;

26. WHEREAS, Daniel Will’s second sentence, ***“The exercise of these powers does not arise under RSA Chapter 141-C, as the plaintiffs appear to allege,”*** is intentionally misleading, as invoking RSA 4:45 requires the Governor to faithfully enforce RSA 4:45 III(a) “To enforce all laws,” which would include Public Health Emergency Management Powers RSA 21-P:53 and the public health laws in RSA 141-C, enacted by the legislature for an epidemic of infectious disease;

- RSA 4:45 cites RSA 21-P:35, VIII, as the definition of a “State of emergency,” and
- RSA 4:47 sites RSA 21-P:35, V as the definition of “Emergency Management,” which includes “epidemic,” and
- RSA 21-P:53 Public Health Emergency Management Powers established the public health powers and duties of the Commissioner of Health and Human Services and the Governor under RSA 141-C during a state of emergency; and

27. WHEREAS, under the New Hampshire Constitution, Part II, art. 90; RSA 21-P:53; and RSA 141-C are in full force and effect until they are repealed by the legislature;

28. WHEREAS, Daniel Will’s third sentence, **“and none of the provisions of RSA Chapter 141-C therefore apply to this case,”** is intentionally misleading and constitutes fraud on the Court, as invoking RSA 4:45 and RSA 4:47 compels performance under RSA 21-P:35 V and RSA 21-P:53; therefore, RSA 141-C is the controlling statutory duty of the Governor. RSA 4:45 and RSA 4:47 do not delegate any authority to the Governor to suspend RSA 21-P:53 (Public Health Emergency Management Powers) or RSA 141-C (Public Health Laws of the state), as such actions are contrary and repugnant to the New Hampshire Constitution, Part I, art. XXIX [Suspension of Laws by Legislature Only]; the separation of powers, Part I, art. XXVII; and the New Hampshire Constitution, Part II, art. 90;

29. WHEREAS, RSA 4:47 III, **“The power to make, amend, suspend and rescind necessary orders, rules and regulations”** applies to RSA 4:45 III(a) **“all”**

**emergency management forces and helpers in the state.**” Orders, rules, and regulations, by their definition, are not statutes or laws. The words statute(s) and law(s) are excluded from RSA 4:47; therefore, they cannot be included. RSA 4:45 includes the word “laws” in section III(a) **“to enforce all laws.”** *inclusio unius est exclusio alterius (a principle in statutory construction: when one or more things of a class are expressly mentioned, others of the same class are excluded).* All emergency management statutes are void of any authority to make or suspend the laws of the state, as such actions are prohibited by the New Hampshire Constitution, Part I, art. XII; Part I, art. XXIX; Part I, art. XXVII; and Part II, art. 90. Under our republican form of government, the Executive may only carry out and enforce the laws delegated to him, as written pursuant to the Constitution of New Hampshire by the legislature;

30. WHEREAS, the Governor issued Emergency Order #76 on 12/11/2020 and suspended “NH RSA 141-C:20-f, II-III and IX” nine months into the lockdown. This is the first Executive Order to mention any section of RSA 141-C. Again, this Order is a public confession of the knowledge of RSA 141-C and mens rea to deceive the court and the Affiant (and the citizens of this State). Remember, Attorney Daniel Will told the Court, **“and none of the provisions of RSA Chapter 141-C therefore apply to this case,”** and now this order publicly states that RSA 141-C is in full force and effect. The suspension of the aforesaid provision (the will of the legislature) is in direct violation of the Constitution, Part I, art. XIX; Part I, art. XXXVII; and Part II, art. 90;

31. WHEREAS, the Governor issued Emergency Order #76 on 12/11/2020. This Order is the first public confession of the Governor of the knowledge of RSA 21-

P53 and that he is now invoking its authority, which the state omitted from the aforesaid Binford Court and subsequent cases relating to this issue. The Governor also cites RSA 141-C:15-a as his authority; yet RSA 141-C:14-a is ignored. The clear intention of the Governor is to suspend the due process rights of the Affiant (and the citizens of this State). Again, mens rea to commit fraud before the Courts “**is otherwise calculated to induce a belief that it does have a judicial or other official sanction:**”

32. WHEREAS, the Governor issued Executive order 2020-25 on 01/01/2021 to reaffirm everything in the proceeding content in Chapter 30;

33. WHEREAS, executive actions cannot be used to deprive the Affiant of his constitutional rights to due process of law under the New Hampshire Constitution, Part I, art. XIV and art. XV, nor can they be used to suspend the probable cause requirement of the state, as incorporated in the New Hampshire Constitution, Part I, art. XIX and secured under Public Health Emergency Management Powers, codified by RSA 21-P:53, and Title X, Public Health Laws for an epidemic of infectious disease (RSA 141-C);

34. WHEREAS, such action constitutes nonfeasance of the Governor’s duty to uphold the Public Health Emergency Management Powers, “RSA 21-P:53 Public Health Powers and Duties,” as required by law during an epidemic of infectious disease, codified in Title X, RSA 141-C, and the Governor’s duty to faithfully support the New Hampshire Constitution, Part II, art. 90;

35. WHEREAS, all exclusions of RSA 21-P:35 and RSA 141-C in the Executive Orders and Emergency Orders constitute both fraud by omission and by malfeasance, as they intentionally deprive the Affiant (and the citizens of this State) of both his due process rights and the probable cause requirements of the state;
36. WHEREAS, ignorance of the law cannot be justified, as the Governor has the benefit of his counsel, Atty. John Formella; the Attorney General, Gordon MacDonald; and the solicitor General, Daniel Will. Attorney Will's declaration that the provisions of RSA 141-C "**do not apply to this case.**" when they in fact do, constitutes fraud and a conspiracy to commit fraud, as RSA 21-P:53, (Emergency Management Powers for Public Health) is the duty of the Governor during an epidemic. The Governor may not simply suspend the very Public Health laws established by the legislature to manage such an event. Said state statutes govern his duty in a public health emergency event such as an epidemic;
37. WHEREAS, fraud and fraud by omission was committed in the Binford Case. The Court opinion must be struck down, as the controlling law (RSA 21-P:53) was ignored by all parties (the plaintiffs, the state, and the Court) in the Binford case;
38. WHEREAS, Justice John C. Kissinger's opinion in his Order is in conflict with itself and is in error. In his opinion, Justice Kissinger establishes the knowledge of RSA 141-C:14-a, RSA 141-C2, RSA 21-P:35 V, RSA 21-P:35 VIII, RSA 21-P:45, and RSA 21-P:47, while ignoring and omitting the controlling law: the Public Health Emergency Powers RSA 21-P:53. Justice Kissinger states "**As**

***an initial matter, the governor’s authority is not derived from RSA 141-C:14-a,***” and then states the following in the Plaintiff’s motion for injunctive relief:

***“The request for immediate injunctive relief is DENIED. An expedited hearing shall be scheduled. Pending further court order, the Emergency Orders issued by Governor remains in effect. See RSA 141-C16-b. so ordered.”*** (03/18/2020);

39. WHEREAS, the continued and unlimited renewal of illegal Executive and Emergency Orders by the Governor has caused the constitutional crisis now before this Court and detailed in this complaint, as such continued renewal of unlawful orders has been used to justify the following state actions separate from the stated purpose of the emergency orders. The Plaintiff continues to suffer irreparable harm by such unconstitutional encroachments of his rights:

- a. Deprivation of due process of law;
- b. Abolishment of all effective means of redress of grievances;
- c. Amendments to our Constitution;
- d. Changes to our laws;
- e. Changes to our voting laws;
- f. Changes to our form of government;
- g. Changes to our representation at the State and Federal level;
- h. Changes to our taxes;

- i. Said changes were achieved by Executive fiat without the consent of the inhabitant and in direct violation of the due process of law, as required by the New Hampshire Constitution, including, and not limited to, Part I, art. XIV and Part II, Form of Government, art. 100;

40. WHEREAS, the Governor has directed a person(s) within the state government to insert the prefix "NH LEGIS E.O." in between the title and the text of both statutes RSA 21-P:47 and RSA 21-P:53, in order to induce a belief that his orders are sanctioned by the legislature and in order to deceive the citizens of this state. The Executive and Emergency Orders are not legislative enactments. Such actions are a clear intent to alter the appearance of the state statues, which are further proof of fraud and malfeasance;

41. WHEREAS, the altering and suspension in secret (no legislative act) of RSA 21-P:47 and RSA 21-P:53 are bad faith actions by the Governor and are evidence of mens rea. Such actions establish knowledge of the controlling Public Health Emergency Management Power statute (RSA 21-P:53), the duty of the state, and the rights of citizens of this State during a state of emergency. Such acts are bad faith actions by the Governor and are intentional acts of fraud, as well as fraud by omission;

42. WHEREFORE, the content of Executive Order 2020-04 and the 24 subsequent orders are a violation of the New Hampshire Constitution, Part I, art. XII; Part I, art. XXIX; Part I, art. XXXVII; and Part II, art. 90, and are enforceable under RSA 638:14 of the criminal code for fraud;

43. WHEREFORE, all 86 Emergency Orders issued pursuant to the Executive Orders constitute fraud and are a violation of the New Hampshire Constitution,

Part I, art. XII; Part I, art. XXIX; Part I, art. XXXVII; and Part II, art. 90 and are enforceable under RSA 638:14 of the criminal code for fraud;

44. WHEREFORE, the Governor cannot issue Executive or Emergency Orders to suspend or make the laws of the land (New Hampshire Constitution, Part II, art.100) or the Public Health Emergency Management statutes RSA 21-P:53 and RSA 141-C enacted by the legislature. The Governor's enactment by Executive fiat of his own orders, rules, and regulations during a public health event and forced on the people of N.H. as law constitutes fraud, as that power is reserved to the legislature, as the New Hampshire Constitution, Part I, art. I; Part I, art. XII; Part I, art. XXIX; Part I, art. XXXVII; and Part II, art. 90 are enforceable under RSA 638:14 of the criminal code;

45. WHEREFORE, the complainant moves the Court to find that Christopher T. Sununu did violate his oath of office by failing to faithfully execute the laws of this state and, knowing that he had no authority to assume such powers, he intentionally issued Executive Orders and Emergency Orders in order to suspend the constitutional rights of the Complainant and the people of this State, as detailed in this Affidavit, by violating RSA 638:14:

*A person is guilty of a misdemeanor who, with a purpose to procure the compliance of another with a request made by such person, knowingly sends, mails or delivers to such person a notice or other writing which has no judicial or other sanction, but which in its format or appearance simulates a summons, complaint, court order or process, including, but not limited to, lien, indictment, warrant, injunction, writ, notice, pleading,*

*subpoena, or **order**, or an insignia, seal or printed form of a federal, state or local government or an instrumentality thereof, or is otherwise calculated to induce a belief that it does have a judicial or other official sanction. (1971, 518:1. 2003, 168:2 (eff. Jan. 1, 2004.);*

### **COUNT I**

1. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Executive Order 2020-04 of 03/13/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT II**

2. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Executive Order 2020-05 of 03/04/2020, under color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT III**

3. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Executive Order 2020-06 of 04/14/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT IV**

4. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Executive Order 2020-07 of 04/23/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT V**

5. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Executive Order 2020-08 of 04/24/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

### **COUNT VI**

6. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Executive Order 2020-09 of 05/15/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

### **COUNT VII**

7. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Executive Order 2020-10 of 06/05/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

### **COUNT VIII**

8. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Executive Order 2020-11 of 06/16/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

### **COUNT IX**

9. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Executive Order 2020-12 of 11/30/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT X**

10. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Executive Order 2020-13 of 06/22/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XI**

11. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Executive Order 2020-14 of 06/26/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XII**

12. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Executive Order 2020-15 of 07/17/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XIII**

13. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Executive Order 2020-16 of 08/07/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XIV**

14. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Executive Order 2020-17 of 08/28/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XV**

15. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Executive Order 2020-18 of 09/18/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XVI**

16. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Executive Order 2020-19 of 10/07/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XVII**

17. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Executive Order 2020-20 of 10/09/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XVIII**

18. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Executive Order 2020-21 of 10/30/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XIX**

19. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Executive Order 2020-22 of 11/18/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XX**

20. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Executive Order 2020-23 of 11/20/2020, under the color law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XXI**

21. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Executive Order 2020-24 of 12/11/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XXII**

22. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Executive Order 2020-25 of 01/01/2021, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XXIII**

23. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Executive Order 2021-01 of 22/01/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XXIV**

24. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Executive Order 2021-02 of 02/12/2021, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XXV**

25. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Executive Order 2021-03 of 01/03/2021, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XXVI**

26. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Executive Order 2021-04 of 03/05/2021, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XXVII**

27. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #1 of 03/15/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XXVIII**

28. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order, finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #2 of 03/16/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XXIX**

29. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #3 of 03/17/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XXX**

30. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #4 of 03/17/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XXXI**

31. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #5 of 03/17/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XXXII**

32. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #6 of 03/18/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XXXIII**

33. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #7 of 03/18/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XXXIV**

34. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #8 of 03/19/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XXXV**

35. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #9 of 03/19/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XXXVI**

36. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #10 of 03/21/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XXXVII**

37. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #11 of 03/23/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XXXVIII**

38. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #12 of 03/23/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XXXIX**

39. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #13 of 03/23/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XL**

40. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #14 of 03/23/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XLI**

41. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #15 of 03/23/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XLII**

42. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #16 of 03/23/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XLIII**

43. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #17 of 03/26/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XLIV**

44. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #18 of 03/27/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XLV**

45. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #19 of 03/27/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XLVI**

46. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #20 of 03/30/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XLVII**

47. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #21, of 04/01/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XLVIII**

48. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #22 of 04/01/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XLIX**

49. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #23 of 04/01/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT L**

50. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #24 of 04/03/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LI**

51. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #25 of 04/03/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LII**

52. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #26 of 04/04/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LIII**

53. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #27 of 04/06/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LIV**

54. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #28 of 04/07/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LV**

55. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #29 of 04/09/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LVI**

56. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #30 of 04/09/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LVII**

57. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #31 of 04/16/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LVIII**

58. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #32 of 04/16/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LIX**

59. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #33 of 04/17/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LX**

60. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #34 of 04/24/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXI**

61. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #35 of 04/24/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXII**

62. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #36 of 04/28/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXIII**

63. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #37 of 04/28/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXIV**

64. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #38 of 04/28/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXV**

65. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #39 of 04/30/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXVI**

**66.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #40 of 05/01/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXVII**

**67.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #41 of 05/05/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXVIII**

**68.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #42 of 05/13/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXIX**

**69.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #43 of 05/13/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXX**

70. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #44 of 05/18/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXXI**

71. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #45 of 05/18/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXXII**

72. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #46 of 05/21/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXXIII**

73. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #47 of 05/47/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXXIV**

74. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #48 of 05/26/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXXV**

75. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #49 of 05/21/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXXVI**

76. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #50 of 05/29/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXXVII**

77. Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #51 of 06/11/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXXVIII**

**78.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #52 of 06/15/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXXIX**

**79.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #53 of 06/17/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXXX**

**80.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #54 of 06/24/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXXXI**

**81.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #55 of 06/25/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXXXII**

**82.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #56 of 06/25/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXXXIII**

**83.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #57 of 06/29/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXXXIV**

**84.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #58 of 06/30/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXXXV**

**85.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #59 of 07/21/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXXXVI**

**86.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #60 of 07/27/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXXXVII**

**87.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #61 of 07/31/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXXXVIII**

**88.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #62 of 08/05/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT LXXXIX**

**89.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #63 of 08/11/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XC**

**90.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #64 of 08/13/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XCI**

**91.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #65 of 08/13/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XCII**

**92.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #66 of 08/31/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XCIII**

**93.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #67 of 09/03/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XCIV**

**94.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #68 of 09/09/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XCV**

**95.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #69 of 09/16/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XCVI**

**96.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #70 of 09/30/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XCVII**

**97.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #71 of 10/27/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XCVIII**

**98.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #72 of 11/14/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT XCIX**

**99.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #73 of 11/16/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT C**

**100.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #74 of 11/19/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT CI**

**101.** Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #75 of 12/10/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT CII**

**102.**Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #76 of 12/11/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT CIII**

**103.**Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #77 of 12/23/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT CIV**

**104.**Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #78 of 12/30/2020, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT CV**

**105.**Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #79 of 01/04/2021, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT CVI**

**106.**Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #80 of 01/04/2021, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT CVII**

**107.**Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #81 of 01/15/2021, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT CVIII**

**108.**Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #82 of 01/15/2021, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

**COUNT CIX**

**109.**Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #83 of 01/22/2021, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

### **COUNT CX**

**110.**Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #84 of 02/11/2021, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

### **COUNT CXI**

**111.**Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #85 of 02/19/2021, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

### **COUNT CXII**

**112.**Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #86 of 03/01/2021, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

### **COUNT CXIII**

**113.**Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #87 of 03/26/2021, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

#### **COUNT CXIV**

**114.**Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of violating RSA 638:14 for issuing Emergency Order #88 of 03/26/2021, under the color of law or “order,” to induce a belief that it does have a judicial or other official sanction.

#### **COUNT CXV**

**115.**Complainant now incorporates all previous paragraphs into this Count and seeks from the Honorable Court an order finding the Defendant guilty of two (2) violations of RSA 638:14, for altering the website without any authority to give the illusion that his Orders have the sanction of the legislature.

I, Daniel Richard, swear and affirm the foregoing facts contained in this Affidavit is true and correct.

\_\_\_\_\_  
Daniel Richard  
Complainant-Affiant  
dwelleth and hath a home at 95 Rockingham Rd. Auburn, NH  
603-315-5755  
drichard186@gmail.com

STATE OF NEW HAMPSHIRE

COUNTY OF \_\_\_\_\_

The foregoing instrument was acknowledged before me this \_\_\_\_\_ day of April, 2021 by Daniel Richard.

(Seal)

\_\_\_\_\_  
Signature of Notary Public

\_\_\_\_\_  
Date of Commission ending

Personally known: \_\_\_\_\_

Or Produce Identification: \_\_\_\_\_

Type of Identification Produced: \_\_\_\_\_