

THE STATE OF NEW HAMPSHIRE  
SUPERIOR COURT

ROCKINGHAM, SS

DOCKET NO.: \_\_\_\_\_

LONDONDERRY FISH AND GAME CLUB, INC.  
P.O. Box 229, Londonderry, NH 03053

v.

JANINE H. ANCTIL & KEVIN N. ANCTIL  
43 Tanager Way  
Litchfield, NH 03052

**JURY TRIAL REQUESTED**

**COMPLAINT**

**I. NATURE OF THE ACTION**

1. This action is brought by the Plaintiff, Londonderry Fish and Game Club, Inc., against Defendants Janine H. Anctil and Kevin N. Anctil for their persistent defamation of the Plaintiff to the media, elected officials, government agencies, and the community at large.

**II. JURISDICTION AND VENUE**

2. This Court has jurisdiction over this matter pursuant to NH RSA 491:7.  
3. Venue is proper because Londonderry Fish and Game Club, Inc. is situated within Rockingham County, in Londonderry, N.H.

**III. PARTIES**

4. The Plaintiff, Londonderry Fish and Game Club, Inc. (“LFGC” or the “Club”), is a domestic nonprofit corporation incorporated in the State of New Hampshire.

5. Defendant Janine H. Anctil is an adult resident of the State of New Hampshire with an address of 43 Tanager Way, Litchfield, N.H. 03052.

6. Defendant Kevin N. Anctil is an adult resident of the State of New Hampshire with an address of 43 Tanager Way, Litchfield, N.H. 03052.

#### IV. FACTS

##### *A. Background*

7. LFGC is a private club that was established in 1951. It has continually operated since that time, and today has a membership consisting of approximately 1,500 members.

8. The Club is situated on approximately 83 acres of land containing a clubhouse, private fishpond, archery range, axe-throwing range, and multiple shooting ranges.

9. LFGC members regularly use the Club property to target practice, hunt, and fish.

10. LFGC maintains a membership of individuals with diverse backgrounds including, but not limited to, doctors, lawyers, engineers, police officers, firefighters, government officials, tradesmen, and military members.

11. To obtain membership to LFGC, an individual must provide proof of the legal ability to possess firearms and then must submit to a new member orientation program covering Club operations, range rules, and safety. The orientation process is approximately two and a half hours long.

12. The Club maintains general safety rules in addition to range-specific rules, all of which are disseminated to the membership at large.

13. LFGC prides itself on a long history of conservation, safety, and community stewardship.

14. Multiple times a year, the Club opens its facilities to the public, hosting events and educational programs such as the New Hampshire Hunter Safety Course.

15. LFGC has coexisted peacefully with its neighbors for decades.

16. LFGC continually performs maintenance and improvements to its facilities to the benefit of its members.

17. After years of planning, engineering, government approvals and due diligence, the Club opened its 200-yard shooting range in November 2017, followed by the opening of its 400-yard shooting range in early 2018.

18. Both the 200 and 400-yard ranges have berms on three sides, including end berms exceeding twenty feet in height.

19. Prior to using the 200 and 400-yard ranges, each existing LFGC member was required to participate in a separate orientation program and received rules specific to the new ranges. For new members, the orientation specific to the new ranges was added to the new member orientation program.

20. Like all of the other shooting facilities at LFGC, the 200 and 400-yard ranges have been utilized by the Club in a responsible manner since opening.

***B. Recreational Shooting by the Public in the Forest Lands Adjacent to LFGC***

21. For more than a decade, members of the public have engaged in extensive target practice in forested areas located in close proximity to LFGC and neighborhoods in both Litchfield and Londonderry.

22. The areas regularly utilized by the public for shooting activities include, but are not limited to, the Musquash Conservation Area (the “Musquash”), the Litchfield State Forest, and the powerline corridor.

23. In 2015, a bullet sailed through the window of a cafeteria at a Londonderry business. Two individuals who had been shooting recklessly in the wooded area nearby the business were arrested. LFGC had absolutely no involvement with the incident.

24. Reckless shooting activities in publicly accessible wooded areas caused the Town of Londonderry to pass an ordinance restricting target shooting in the Musquash in 2015.

25. Londonderry then hired its own “Town Conservation Ranger” in the summer of 2019, tasked with patrolling the conservation areas where shooting activities regularly occur.

26. Following suit with Londonderry, the Litchfield State Forest became closed to shooting activity in 2020.

27. Despite the efforts of Londonderry and Litchfield, shooting activity continues to occur in the restricted areas.

28. Shooting activity also regularly occurs within the powerline corridor running south of LFGC, and north of Tanager Way in Litchfield. Evidence of said shooting activity is readily available to anyone who walks into the area.

29. An LFGC Board Member took video within the powerline corridor on October 23, 2021. The video depicts the remnants of reckless shooting activity including a two-by-four nailed to a tree containing bullet holes without any berm or backstop behind it, as depicted in the screenshots from the video below:



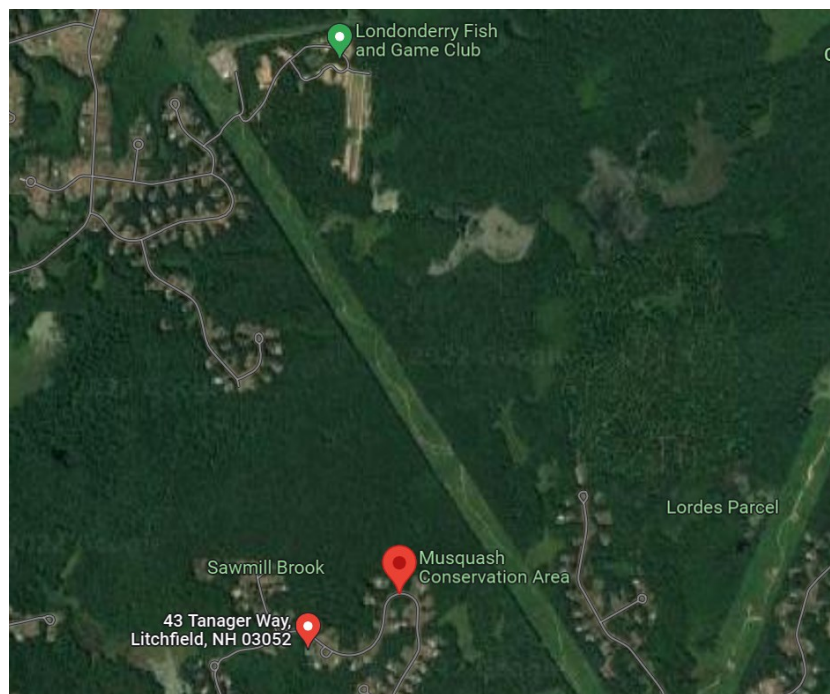
30. Even worse, a residential neighborhood sits behind the two-by-four, directly within the line of fire.

31. LFGC would never tolerate such unsafe shooting practices at its facilities.

***C. The Anctils Begin Making False Allegations Against the Club***

32. Defendants Kevin and Janine Anctil live at 43 Tanager Way in Litchfield, which is approximately 1.3 miles away from LFGC.

33. The Anctils' home is adjacent to the Musquash Conservation area and southwest of the powerline corridor.



34. On the morning of Tuesday, September 14, 2021, Defendant Kevin Anctil contacted the Litchfield Police Department (“Litchfield PD”) after his son found that a garage window was broken at the Anctil’s home.

35. Officer Slade Rasmussen of the Litchfield PD responded to the 43 Tanager Way property to take a report.

36. Officer Rasmussen noted a small hole in the window screen and larger hole in the glass. He and Mr. Anctil looked in the garage and were unable to locate any sort of projectile that struck the window.

37. That evening, Defendant Janine Anctil and her brother, Daniel Harrison, appeared at the Litchfield PD and spoke with Sergeant Dennis Tessier.

38. Mrs. Anctil was emotional and insistent that a bullet had hit her window despite no projectile having been found.

39. More specifically, despite having no supporting evidence, Mrs. Anctil communicated that she believed a bullet came from LFGC.

40. Mr. Harrison concurred with Mrs. Anctil's theory, explaining that a bullet had entered his sister's house a mere ten feet from where people were sitting. He demanded that the police remove the bullet "from the wall" and perform a trajectory analysis.

41. Sergeant Tessier explained that the Department lacked the training and expertise to perform a trajectory analysis. Also, there was no bullet lodged in the wall; that was a complete fabrication by Mr. Harrison.

42. Mrs. Anctil claimed that this was the **fourth incident** involving a bullet striking a home in her neighborhood.

43. The meeting ended with Mrs. Anctil and Mr. Harrison explaining that they did not want LFGC "closed down" or for criminal charges to be filed. They were "looking for someone to make the range safe." Again, these statements were made with no evidence that a bullet had struck their home from LFGC.

44. On the afternoon of September 15, 2021, Sgt. Tessier and Mrs. Anctil spoke again. They had both attempted to contact someone who could assist them from the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”). Unsurprisingly, given that an unknown projectile striking a home involves neither federal law nor a Federal Firearms Licensee, ATF declined to become involved.

45. During her call with Sgt. Tessier, Mrs. Anctil claimed that there had been **six instances** of bullet strikes in her neighborhood.

46. On that same day, Mrs. Anctil contacted multiple government agencies including, but not limited to, New Hampshire Fish and Game, the Londonderry Police<sup>1</sup>, the New Hampshire State Police and the Londonderry Building Department.

47. Upon information and belief, in each instance of making contact with various criminal investigative authorities and government agencies far and wide, Mrs. Anctil blamed LFGC for striking her home with a bullet.

48. In a second call with Sgt. Tessier later in the evening of September 15, 2021, Mrs. Anctil again stated that she wasn’t seeking to pursue criminal charges, she just wanted “the range made safer.”

49. Sgt. Tessier explained that a projectile had not been recovered so they could not even be certain that it was a bullet that struck her garage.

50. In response, Mrs. Anctil communicated that she was certain it was a bullet that hit her home.

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<sup>1</sup> Londonderry PD engaged in a short investigation of the matter and closed the case as “unfounded,” after Sgt. Timony C. O’Donaghue concluded that the bullet strikes were “possibly a result of range activity at the Londonderry Fish and Game Club.” His conclusion was drawn from incorrect elevation data paired with a fundamental misunderstanding of ballistics.

51. At no point did Defendants Kevin or Janine Ancil contact LFGC leadership to discuss their alleged concerns.

52. No later than September 17, 2021, Janine and Kevin Ancil sent correspondence to government officials, including Litchfield Selectman Richard Lascelles, lobbying unsupported and defamatory allegations against LFGC including, but not limited to, stating the following (emphasis added):

- “I am a constituent in Litchfield, NH seeking your assistance with an urgent safety matter **caused by irresponsible behavior at the Londonderry Fish and Game Club.**”
- On Tuesday 9/14/21 a bullet struck and **entered my home only a few feet from my husband.**
- “[T]his is the latest in a pattern of behavior in which **4 bullets** have struck houses in my neighborhood, as well as two other bullets found on properties.
- “All of the impacted neighbors live in a direct line **from the end of a long shooting range at the Londonderry Fish and Game club** (sic).”
- “Previous attempts to address safety concerns with the gun club have been met with resistance and the matter was dropped.”
- “I am reaching out to you as my state representative imploring you to get an investigation into **the irresponsible behavior of this particular gun club** so we can stop these bullets impacting houses and save lives.”

53. Without a shred of evidence that LFGC had caused bullet strikes in their neighborhood, the Ancils immediately blamed the Club’s 200 and 400-yard ranges<sup>2</sup>, falsely

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<sup>2</sup> As will be further described herein, out of the two bullets recovered and analyzed from the Tanager Way neighborhood, one of them struck a home approximately two years before the 200 and 400-yard ranges came to exist.



alleged that the club was engaged in “irresponsible behavior,” and falsely claimed the Club had resisted “attempts to address safety concerns.”

54. On September 20, 2021, Corporal Christopher Rider and Captain Thomas Scotti of the Litchfield PD visited the Anctil home and met with Kevin Anctil. After emptying out approximately 1/3 of the garage, they located a projectile that they believed came through the window. The projectile was seized as evidence.

55. On the same date, Marc Cloutier, who resides at 6 Heron Drive, which connects to Tanager Way, spoke to Corporal Rider by telephone. He explained that he found a bullet in the deep end of his pool in the summer of 2020, which he believed to be 9mm.

56. Mr. Cloutier explained that **he frequently hears people shooting in the woods near his property**. He believed that the bullet came from shooting in the woods, not from LFGC. He further explained that he can tell the difference between the far away gunfire occurring at LFGC and the people shooting much closer in the woods.

57. On September 21, 2021, Corporal Rider went to the residence of Brian Allaire, located at 39 Tanager Way, who had reported a bullet striking his home **on December 21, 2015**. The bullet was recovered from a bulge in the sheetrock of an exterior wall. That projectile was seized into evidence.

58. Also on September 21, 2021, Corporal Rider spoke with Devin Weidner at her home at 40 Tanager Way. Ms. Weidner explained that after speaking with neighbors, she inspected her home and found damage to her siding. Ms. Weidner pointed to a hole in vinyl siding which she believed may have come from a projectile. No projectile was recovered and the police could not confirm if a projectile was even the cause of the damage. Corporal Rider noted that if the damage was from a projectile, it appeared to be at a different trajectory than the other strikes.

59. On the same date, Corporal Rider reviewed a police report from February 10, 2019, involving a home located at 41 Tanager Way being hit by a projectile. In that case, a bullet was recovered and appeared to be a .223 or similar rifle caliber. The investigating officer believed the damage to the bullet indicated it struck the home after a ricochet. The bullet was discarded without forensic testing and the case was closed with the bullet's origin unknown. If the bullet strike did, in fact, result from a ricochet, simple ballistic math excludes LFGC as being the origin.

60. In total, the Litchfield PD's investigation into the Anctil's complaint resulted in only two projectiles being recovered: one from the Anctil home and the other from the Allaire home. Both bullets were sent to the New Hampshire Department of Safety Forensic Lab.

61. The Lab released a report on September 27, 2021, identifying both bullets as ".30 caliber, copper-coated steel jacketed bullets, commonly loaded into 7.62 x 39mm cartridges."

62. 7.62 x 39mm cartridges are intermediate rifle cartridges not designed for long-distance shooting.

63. The ballistic math simply does not support that the bullet that struck the Anctil home originated from typical shooting activity at LFGC, approximately 1.3 miles away (as the crow flies).

64. Further, the only other bullet recovered and tested was the bullet that struck the Allaire residence (39 Tanager Way) two years before the 200 and 400-yard ranges at LFGC even existed. That bullet was of the same caliber and type as the one that hit the Anctil residence.

65. Despite the Anctils repeatedly claiming that an errant miss on the 200 or 400-yard range could cause a shooter to unknowingly send a bullet to their home, that claim is empirically false.

66. The 200 and 400-yard ranges each contain 20+ feet of berm sitting in front of a tall, densely-forested tree line.

67. Additionally, when drawing a straight line from the shooting positions at the 200 and 400-yard ranges to the Anctil home, the topography increases in elevation by more than 80 feet at approximately .7 miles.

68. In summary, for a bullet fired from a 7.62 x 39mm cartridge to travel the approximately 1.3 miles to the Anctil home, make it over the berm, make it over the tree line, and then make it over the 80+ foot elevation increase, a shooter would need to fire at a radical upward angle. The Anctils have no evidence that such a highly unlikely incident occurred.

69. To date, no law enforcement agency has ever concluded that LFGC caused the bullet strikes in the area of Tanager Way.

#### ***D. The Anctils Defame the Club in the Press***

70. Beginning no later than September 21, 2021, Defendants Kevin and Janine Anctil initiated a full-fledged media campaign falsely blaming LFGC for the bullet strikes in the Tanager Way area.

71. More specifically, without any supporting evidence, the Anctils claimed that the bullet strikes originated at the 200 and/or 400-yard ranges at LFGC.

72. The Anctils made contact with several news outlets to defame the Club including, but not limited to, the New Hampshire Union Leader, WMUR, WHBH- Boston, Boston 25 News and NBC Boston.

73. Janine Anctil made multiple statements to the media falsely blaming LFGC, either explicitly or implicitly, for bullet strikes in her neighborhood. Her statements included, but were not limited to, the following:

- "We're a direct straight line from the end of the long-range shooting range at the gun club in Londonderry."
- "Every time a house has been hit, it has gone nowhere because of either jurisdiction issues or the range saying 'prove it.'"
- "I'm not saying I'm against having a gun range. It was there when I moved in. I'm not against people owning guns, but I'm certainly against (bullets) coming into our houses and killing us. It should be a concern for every responsible gun owner because people getting shot in their homes is what turns people away from guns."
- Ms. Anctil told the Union Leader that **five properties** have been damaged by bullets in her neighborhood, as reported on September 21, 2021.

74. Kevin Anctil also made multiple statements to the media either expressly or implicitly blaming LFGC for the bullet strikes, falsely casting LFGC in a negative light. His statements included, but were not limited to, the following:

- "If one house gets hit, maybe if two houses get hit...[But] when you have four houses in direct line with a high-powered gun range?"
- "It's just not fair that an entire neighborhood should feel scared like this, in their own homes."
- "We're not trying to take anybody's guns away. We're not trying to put the range out of business or make it closed. We just need to be safe here."

75. Despite his son being the person who discovered the damage to the garage window, Kevin Anctil represented to the media that he was in close proximity to the bullet strike at his home, and made statements such as:

- "If it had been a mere 10 feet that way it will be a much different discussion we were having right now."

76. In a media report broadcast by Boston 25 News on September 23, 2021, Mr. Anctil falsely insinuated that new information confirmed that the bullet strikes came from LFGC:

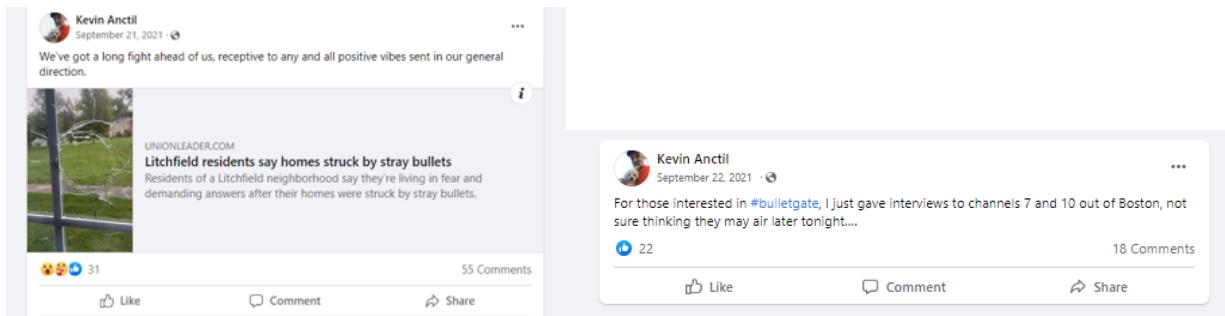
- “‘Prior to tonight I was couching my statements very carefully’, Kevin said. ‘There’s an ongoing police investigation so I cannot reveal too much, but I have been reinforced in my beliefs and I don’t have any doubt that these bullets are originating from this gun range. Nothing else adds up.’”

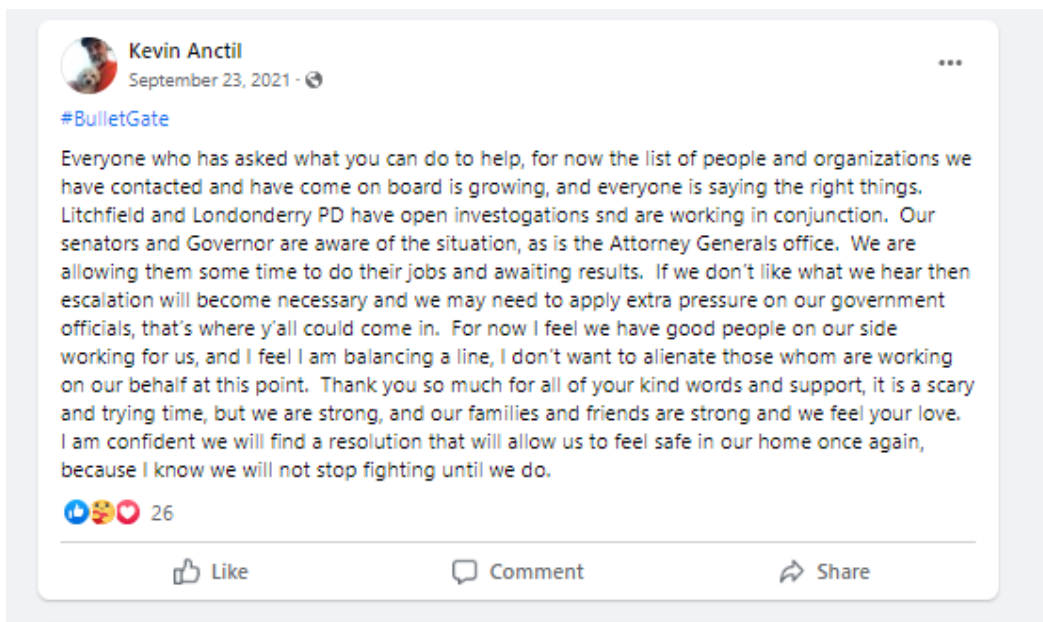
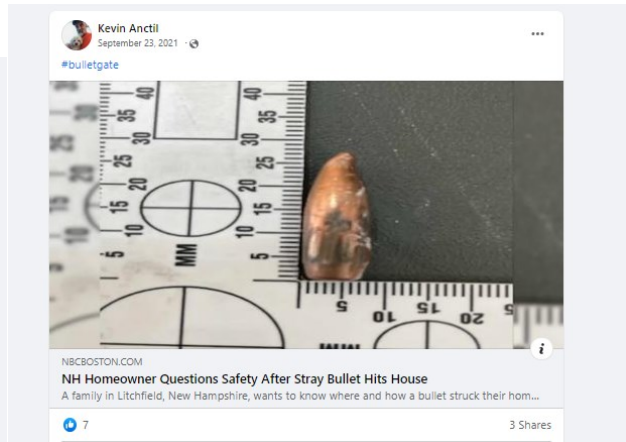
77. Again, no investigative agency ever concluded that LFGC was the source of the bullet strikes in the Tanager Way area.

78. In a Union Leader story published on September 21, 2021, Litchfield Police Captain Thomas Scotti was asked if LFGC was considered to be a possible source of the bullets in question, to which he appropriately responded: “It would be unfair for me to point a finger simply because I don’t have any evidence to support it.”

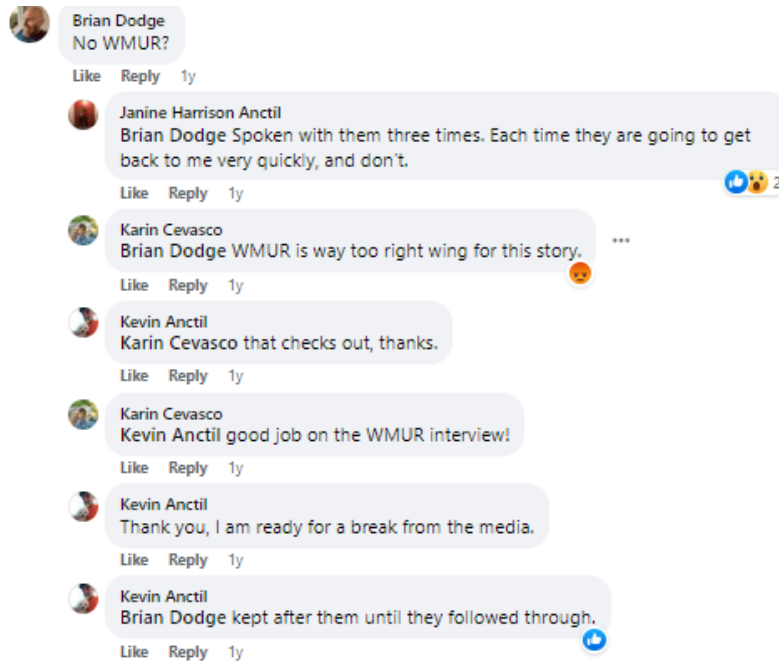
***E. The Anctils Use Social Media to Further Their Campaign of Defamation Against LFGC***

79. Defendants Kevin and Janine Anctil took to social media to promote their news appearances while making further defamatory claims about the club. Mr. Anctil even developed an associated hashtag, “#BulletGate,” to link his various posts together:





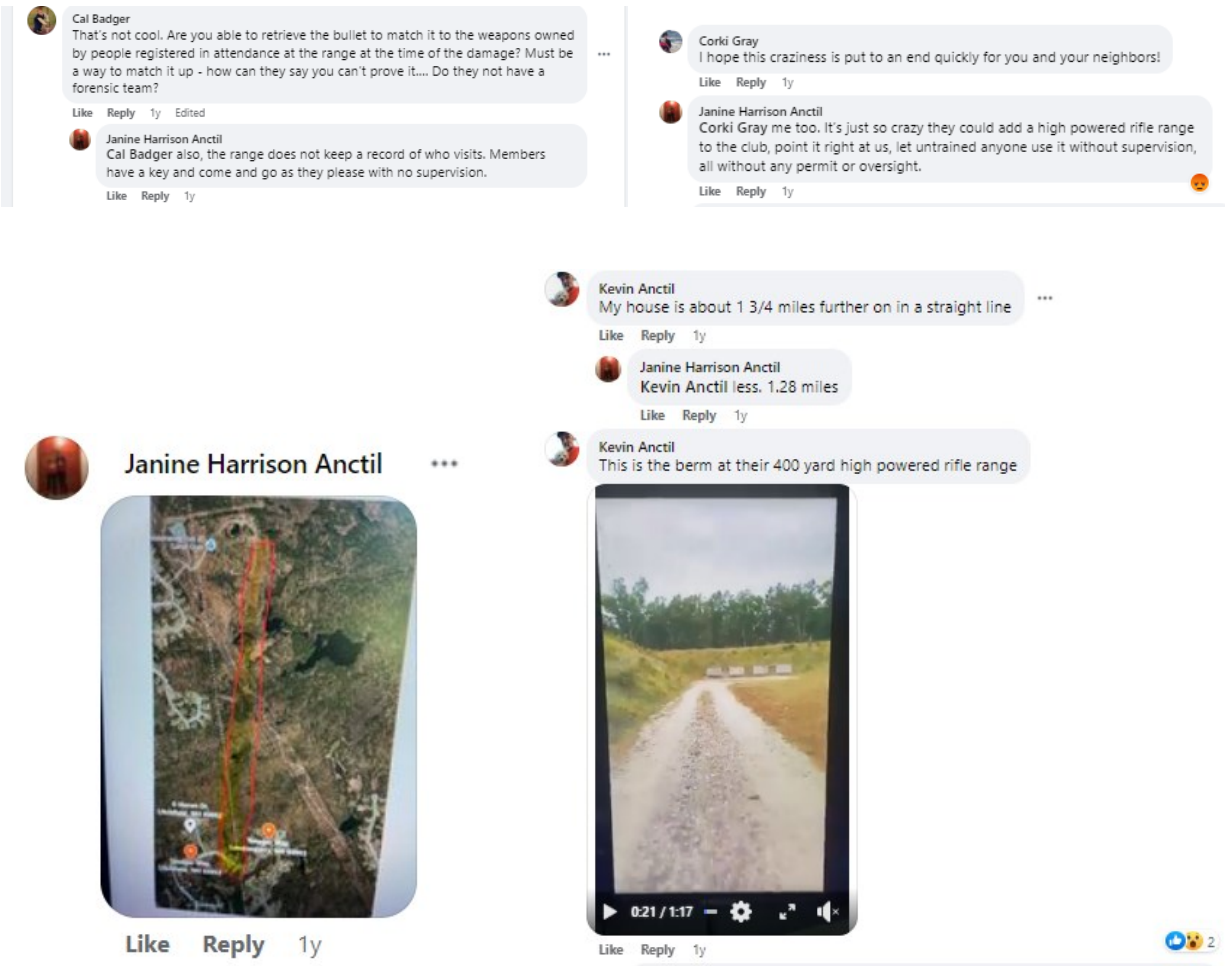
80. Demonstrating their persistent effort to further their media attacks, Mr. and Mrs. Ancil described persistently pursuing WMUR for an interview in the comments section of a Facebook post dated September 22, 2021:



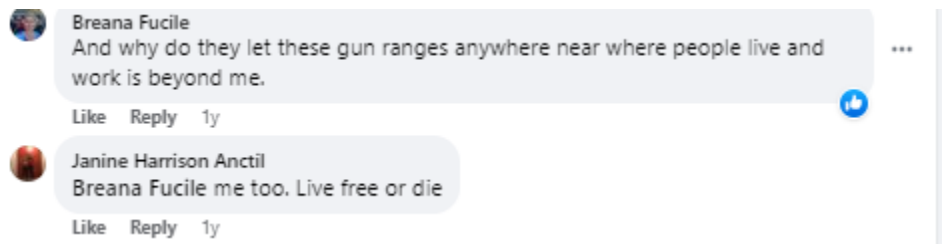
81. Although the Anctils had never reached out to LFGC directly, in the comments section of a Facebook post dated September 21, 2021, Janine Anctil falsely claimed that LFGC had been contacted, reacted in a hostile manner, and had acted in a hostile manner previously:



82. The Anctils utilized the same September 21, 2021, Facebook comment thread to further their false claims that LFGC's 200 and 400-yard ranges were the source of the bullet strike on their home, while also falsely claiming that individuals who use the range receive no training or supervision:



83. Although the Anctils claimed to the media that they do not seek to cause the closure of LFGC, Mrs. Anctil openly expressed her dissatisfaction with living near a gun range (which she chose to move into the proximity of):





84. Apart from engaging in defamation on their individual Facebook pages, the Anctils defamed the Club on Litchfield community pages as well, stopping at nothing to damage the reputation of LFGC and cast the club in a negative light.

***F. The Anctils Send a Cease-and-Desist Letter and Are Confronted with Ballistic Math***

85. Under date of December 27, 2021, the Anctils sent a cease-and-desist letter to LFGC through legal counsel. The letter claimed that “**nearly a dozen bullets**”<sup>3</sup> were found at either the Anctils’ property or neighboring properties.

86. The letter falsely claimed that the bullet strikes only began occurring after the 200 and 400-yard ranges were built (see Allaire bullet strike- December 21, 2015).

87. The letter went on to demand that LFGC cease utilizing the 200 and 400-yard ranges or a lawsuit would be filed in ten days.

88. LFGC responded to the cease-and-desist letter by correspondence through undersigned legal counsel dated December 29, 2021.

89. In addition to providing a detailed factual analysis, LFGC’s response included ballistic math demonstrating that the bullet that struck the Anctil’s home is very unlikely to have come from LFGC.

90. It was explained that an unintentional miss over the 20+-foot berm at the 200 or 400-yard range would not cause a .30 caliber projectile from a 7.62 x 39mm cartridge to travel the approximately 1.3 miles from LFGC to the Anctil’s home. In order for the bullet in question to have traveled that distance from LFGC, a shooter would have needed to recklessly point and fire into the sky.

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<sup>3</sup> LFGC requested information regarding the other bullets the Anctils alleged to have found and asked that they be preserved. To date, no further information regarding said alleged additional bullets has been provided.

91. LFGC also pointed out that the only other bullet preserved and subject to forensic testing (from the Allaire residence), was of the same caliber, and had been involved in a bullet strike long before the 200 and 400-yard ranges existed.

92. After legal counsel traded one more set of letters and spoke on the phone, the Anctil's attorney took no further action and made no further contact with counsel for LFGC.

### ***G. The Anctils' Defamation Continues***

93. Even after the Anctils were provided ballistic calculations demonstrating that the projectile that struck their home was very unlikely to have originated from LFGC, their campaign of disparagement against the Club continued unabated.

94. After many months of making false claims to government officials and the public, on June 13, 2022, the Anctils appeared at a meeting of the Litchfield Board of Selectmen, along with a group of supporters they have convinced of LFGC's fault.

95. At that Board meeting, the Anctils made multiple false and/or defamatory claims including, but not limited to:

- **Nine bullets** have landed around Tanager Way.
- The 200 and 400-yard ranges were built “seven or eight years back.”
- Multiple police investigations have determined the bullet strikes likely originated from LFGC.
- LFGC has “almost hurt someone a couple of times.”
- Since the time the ranges were built, there have been four houses struck on Tanager Way.
- A shooter using a benchrest position at the LFGC 400-yard range only has six-to-eight feet of berm protection and merely six-to-ten feet at the 200-yard range.
- That members of LFGC shoot out of the back of pickup trucks.
- That LFGC said it would bankrupt the Anctils if they brought legal action.

- LFGC is unsafe and raising the berm height alone is not enough according to unspecified experts.

96. The Anctils pressed the Litchfield Board to take action against the Club and to make referrals to various government entities.

97. Due to the litany of false and defamatory allegations the Anctils made against the Club to the Litchfield Board of Selectmen, LFGC felt reasonably compelled to appear at a Litchfield Board Meeting on June 27, 2022, with retained legal counsel, and present the actual facts and evidence pertaining to the situation, all of which indicate that the Anctils' claims are false.

98. Despite being confronted with a wealth of empirical evidence contradicting their claims, the Anctils have continued to recklessly or intentionally disregard the truth in pursuit of defaming the character of LFGC.

99. The Anctils' smear campaign against the Club is unrelenting and continues to the present date, compelling LFGC to incur unnecessary expense and pursue legal action.

100. Due to the Defendants' persistent defamation of the Plaintiff, the Plaintiff has suffered and continues to suffer significant damages within the jurisdictional limits of the Court including, but not limited to, reputational harm, humiliation, attorney's fees, and legal costs. The Plaintiff seeks all damages to which it is entitled, including any equitable relief the Court may provide to halt the ongoing tortious conduct of the Defendants. The Plaintiff also seeks enhanced compensatory damages for the wanton, willful, and malicious nature of the Defendants' conduct.

**COUNT I**  
**DEFAMATION AGAINST JANINE H. ANCTIL**

101. The Plaintiff repeats and realleges each allegation contained in all preceding paragraphs as if fully set forth herein.

102. As described herein, Defendant Janine Anctil intentionally, maliciously, or without reasonable care, has communicated and/or published false and defamatory statements of fact about LFGC to multiple third parties on multiple occasions.

103. Mrs. Anctil made her statements without valid privilege.

104. Mrs. Anctil's false and defamatory statements concerning LFGC were made in a way in which they would be easily understood by recipients of her communications and would tend to lower LFGC's esteem in the community.

105. Mrs. Anctil's defamation of LFGC has caused LFGC to incur damages within the jurisdictional limits of the Court. LFGC seeks all monetary and equitable relief to which it is entitled.

**COUNT II**  
**DEFAMATION PER SE AGAINST JANINE H. ANCTIL**

106. The Plaintiff repeats and realleges each allegation contained in all preceding paragraphs as if fully set forth herein.

107. As described herein, Defendant Janine Anctil intentionally, maliciously, or without reasonable care, has communicated and/or published false and defamatory statements of fact about LFGC to multiple third parties on multiple occasions.

108. Mrs. Anctil made her statements without valid privilege.

109. Mrs. Anctil's false and defamatory statements concerning LFGC were made in a way in which they would be easily understood by recipients of her communications and would tend to lower LFGC's esteem in the community.

110. Mrs. Anctil's false and defamatory statements concerning LFGC included accusing the Club of reckless, illegal, morally outrageous, or other conduct likely to expose it to public hatred, ridicule, contempt or disgrace.

111. Therefore, Mrs. Anctil is liable for defamation per se.

112. LFGC seeks all monetary and equitable relief to which it is entitled.

**COUNT III**  
**DEFAMATION AGAINST KEVIN N. ANCTIL**

113. The Plaintiff repeats and realleges each allegation contained in all preceding paragraphs as if fully set forth herein.

114. As described herein, Defendant Kevin Anctil intentionally, maliciously, or without reasonable care, has communicated and/or published false and defamatory statements of fact about LFGC to multiple third parties on multiple occasions.

115. Mr. Anctil made his statements without valid privilege.

116. Mr. Anctil's false and defamatory statements concerning LFGC were made in a way in which they would be easily understood by recipients of his communications and would tend to lower LFGC's esteem in the community.

117. Mr. Anctil's defamation of LFGC has caused LFGC to incur damages within the jurisdictional limits of the Court. LFGC seeks all monetary and equitable relief to which it is entitled.

**COUNT IV**  
**DEFAMATION PER SE AGAINST KEVIN N. ANCTIL**

118. The Plaintiff repeats and realleges each allegation contained in all preceding paragraphs as if fully set forth herein.

119. As described herein, Defendant Kevin Anctil intentionally, maliciously, or without reasonable care, has communicated and/or published false and defamatory statements of fact about LFGC to multiple third parties on multiple occasions.

120. Mr. Anctil made his statements without valid privilege.

121. Mr. Anctil's false and defamatory statements concerning LFGC were made in a way in which they would be easily understood by recipients of his communications and would tend to lower LFGC's esteem in the community.

122. Mr. Anctil's false and defamatory statements concerning LFGC included accusing the Club of reckless, illegal, morally outrageous, or other conduct likely to expose it to public hatred, ridicule, contempt or disgrace.

123. Therefore, Mr. Anctil is liable for defamation per se.

124. LFGC seeks all monetary and equitable relief to which it is entitled.

WHEREFORE, the Plaintiff, Londonderry Fish and Game Club, Inc., respectfully prays this Honorable Court:

- A. Find the Defendants liable as to all counts;
- B. Award all damages at law and equity to which the Plaintiff is entitled; and
- C. Grant such further relief as this Court may deem just and proper.

Respectfully submitted,

Londonderry Fish and Game Club, Inc.,  
By its attorneys,  
Lehmann Major List, PLLC

Date: October 5, 2022

By: /s/Sean R. List  
Sean R. List, Esq., NH Bar No. 266711  
Jason R.L. Major, Esq., NH Bar No. 14782  
6 Garvins Falls Road  
Concord, NH 03301  
603.715.2516  
sean@nhlawyer.com  
jason@nhlawyer.com