

STATE OF NEW HAMPSHIRE

HILLSBOROUGH, SS

HILLSBOROUGH SUPERIOR COURT,
NORTH

DOCKET # 05-1305, 1306, ,1307

STATE V. GERARD BELOIN

OBJECTION TO STATES MOTION TO REVIEW AND AMEND BAIL CONDITIONS

NOW COMES Gerard Beloin, by and through his attorney, Paula J. Werme, Esq., and hereby moves this honorable Court to DENY the State's MOTION TO REVIEW AND AMEND BAIL CONDITIONS.

The defendant has never been convicted of any gun crime. He has never been arrested for any crime what so ever, misdemenaur or felony. The Defendant is a non violent person who does not own and has never even owned a hunting liscense.

Of the incident in Peterborough, Defendant informed the Peterborough Police Officers that all honest cops like them now have to worry more about their safety because of the actions of Officer Kerry Steckowych. He also informed the police that he was not alone in being threatened but that he was the only one with a recording of the death threats. On March 28, 2006 a copy of the recordings, along with a letter addressed to Peterborough Police Chief Guinard was delivered to the Peterborough PD. A copy of it is included with this Motion. (EXHIBIT A) The letter condenses the case. The final paragraph is quoted here.

"In Goffstown, I am not alone in being threatened. However, I am the only one with a recording of these death threats against me saying that the police will shoot me dead if I don't shut up. I feel much safer than the others. It is the others out there who are not as fortunate as me that your fellow law enforcement officers need to worry about. Today, all police officers are less safe because of Steckowych's threats of the assassination of law abiding citizens at the hands of police gun fire."

The copy of the recordings speak for themselves.

On April 24, 2006 Defendant testified at the Goffstown PD public information session and quoted from the Court records. Defendant has a recording of this public session. The Prosecutions version of the statements made by the Defendant at that meeting are completely false and inflammatory. The Defendant simply quoted from the statements made on page 2, paragraph 7, of the Defendants Second Motion to Dismiss. The quote was a verbatim repetition of the following quote from our Second Motion to dismiss.

“7. Defendant came to the meeting armed with a tape recorder and firearm. He used the tape recorder. Mr. Janigan was acting as a “personal messenger” for local Prosecutor, Officer Kerry Steckowych and other Goffstown Officials. **(EXHIBIT C-4)** - addressed to “Gentlemen.”) He delivered the message that they would shoot him and get rid of him like they did Dr. Hieber, the previous Goffstown School Board Chairman working with him to expose these crimes. The recordings show **John Janigan, acting as Prosecutor Steckowych’s agent, putting a hit out on him!** To this day, no one knows what Dr. Hieber died of. (Hillsborough County Superior Court Case NO. 03-C-104 - Hieber v Catholic Medical Center)”

Respectfully submitted by and through his attorney,

Gerard Beloin



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was sent to Attorney David Rotman, Deputy Merrimack County Attorney, 4 Court Street, Concord, NH 03301 on this date, 2006.

May 30, 2006



Paula J. Werme, Esq.