

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA**

United States of America,

v.

Joseph Gallagher,

Defendant.

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Case No. 6:24-cr-00721-JDA

**DEFENDANT JOSEPH GALLAGHER'S
MOTION FOR A DOWNWARD VARIANCE**

The defendant Joseph Gallagher respectfully requests that, based on the facts and circumstances of his individual case, in light of the factors enumerated in 18 U.S.C. § 3553(a), the appropriate sentence here is one of non-incarceration. Mr. Gallagher is 67 years old and has been a life-long leader in the Upstate community, volunteering his time and supporting organizations both financially and with his leadership ability. He has two children, both seniors at Clemson University. Mr. Gallagher has been described as “a pillar in the Greenville community” and has been named one of Greenville’s 50 most influential people. His conduct at issue here is an isolated event in an otherwise upstanding life. A sentence of non-incarceration “is consistent with § 3553(a)’s directive that the sentence reflect the need for ‘just punishment’ and ‘adequate deterrence.’” *United States v. Pauley*, 511 F.3d 468, 474–75 (4th Cir. 2007) (quoting 18 U.S.C. § 3553(a)(2)(A) and (a)(2)(B)).

18 U.S.C. § 3553(a) directs the Court to impose “a sentence sufficient, but not greater than necessary” to comply with the purposes of sentencing enumerated in § 3553(a). In determining what sentence is sufficient but not greater than necessary the Court must consider the factors listed in Section 3553(a). These factors are the following:

- (1) the nature and circumstances of the offense and the history and characteristics of the defendant;
- (2) the need for the sentence imposed:
 - (A) to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense;
 - (B) to afford adequate deterrence to criminal conduct;
 - (C) to protect the public from further crimes of the defendant; and
 - (D) to provide the defendant with needed educational or vocational training, medical care, or other correctional treatment in the most effective manner;
- (3) the kinds of sentences available;
- (4) the kinds of sentence and the sentencing range established under the sentencing guidelines;
- (5) any pertinent policy statement issued by the Sentencing Commission;
- (6) the need to avoid unwarranted sentencing disparities among defendants with similar records who have been found guilty of similar conduct; and
- (7) the need to provide restitution to any victims of the offense.

18 U.S.C. § 3553(a)(1)-(7).

In sentencing a defendant, the Court must first calculate the applicable Guidelines range. *Pauley*, 511 F.3d at 473. The government and the defendant agree that the applicable Guidelines range here is 41 to 51 months of imprisonment. After giving both the government and the defendant the opportunity to argue for a sentence they deem appropriate, “the sentencing court should then consider all of the § 3553(a) factors to determine whether they support the sentence requested by either party.” *Pauley*, 511 F.3d at 473. “In so doing, the sentencing court may not presume that the Guidelines range is reasonable.” *Pauley*, 511 F.3d at 473 (citing *Gall v. United States*, 552 U.S. 38, 48, 128 S. Ct. 586, 596, 169 L. Ed. 2d 445 (2007)). “In the event the sentencing court decides to impose a variance sentence . . . the sentencing court ‘must consider the extent of the deviation and ensure that the justification is sufficiently compelling to support the degree of the variance.’” *Pauley*, 511 F.3d at 473 (quoting *Gall*, 128 U.S. at 38, 128 S. Ct. at 590).

Mr. Gallagher was the President and CEO of AFL Telecommunications (“AFL”), having been employed there for thirty (30) years. AFL employs approximately 700 people in Duncan,

South Carolina. Mr. Gallagher has volunteered substantial time and resources to help people throughout the Upstate:

United Way of Piedmont

United Way of Piedmont's mission is to strengthen economic mobility, educational opportunity, and access to healthcare for families across Cherokee, Spartanburg, and Union counties. Mr. Gallagher was an Ambassador for United Way and an advisor to United Way leadership over the course of twenty (20) years. He led the beginning of United Way's campaign for AFL, and AFL became one of Spartanburg's leading companies for participation and contributions to United Way. Mr. Gallagher developed a leading community engagement model that was shared with many other organizations throughout the State. As stated by Mr. Gallagher, "Community Engagement is one of our Core Values. It's embedded in our culture and will forever be a part of who we are." Exhibit A, AFL/United Way Article.

Artisphere

Artisphere is Greenville's signature cultural event that enriches the community through a celebration of the arts. Mr. Gallagher has volunteered for Artisphere for ten (10) years, and he served on the Board for one (1) year in 2022 / 2023.

Habitat for Humanity CEO Build

Habitat for Humanity CEO Build unites companies to fund and construct a home for a local family with low income. Mr. Gallagher has participated in the CEO Build for at least five (5) years. See Exhibit B, Habitat CEO Build News Articles.

Meyer Center

The Meyer Center is a nonprofit specializing in early education and intensive therapy services to empower children with disabilities to reach their maximum potential. It became one of the top non-profits that AFL supported with employee engagement, including Mr. Gallagher.

Meals on Wheels / Toys for Tots

For over ten (10) years, Mr. Gallagher led AFL's annual meals on wheels campaign and Holiday Toys for Tots.

Apella Board – Spartanburg Regional Healthcare System

Mr. Gallagher served for two (2) years on the Apella Board, which oversees the Spartanburg Regional Healthcare System.

South Carolina Governor's School for Science and Mathematics

Mr. Gallagher served on the Board of the Governor's School for Science and Mathematics in Hartsville, South Carolina for two (2) years, and made financial and resource commitments to the School. He also established an internship program for students to enable them to obtain local opportunities in South Carolina upon graduation.

Middle Tyger – Duncan, South Carolina

Mr. Gallagher, both personally and through AFL, provided leadership and financial support to the Middle Tyger Director for over ten (10) years.

Camp Spearhead

Camp Spearhead is a residential and weekend camp for children and adults with special needs. Mr. Gallagher, both personally and through AFL, has volunteered and provided financial support to Camp Spearhead for over fifteen (15) years. "As a pillar in the Greenville community, AFL CEO, Jody Gallagher, reflects on why these charities mean so much. 'Our core values, especially Community Engagement, have always led us in believing we can help, grow, improve,

and sustain our communities. Both IDefine and Camp Spearhead seek to do the same through their tireless commitment to establishing thriving communities for those they serve. Greenville and the Upstate are beyond thankful to have these charities and the wonderful experiences they provide for all who need them.” Exhibit C, Camp Spearhead News Article (quoting Mr. Gallagher); *see also United States v. Lewis*, 958 F.3d 240, 244 (4th Cir. 2020) (“We recently recognized the importance of addressing nonfrivolous mitigation arguments in our decision in *Ross*, 912 F.3d 740, 744-46 (4th Cir. 2019), in which we held that a district court’s failure to address, among other things, the defendant’s ‘history of gainful employment’ and ‘his role as a caretaker,’ required that his sentence be vacated”).

Once a pillar in the Greenville community and named one of Greenville’s 50 most influential people, the collateral consequences suffered by Mr. Gallagher offset the need for a sentence of imprisonment. *See, e.g., United States v. Blake*, 841 F. App’x 535, 539 (4th Cir. 2021) (unpublished) (remanding for resentencing, stating that “[n]othing in the court’s statements at sentencing demonstrated its meaningful consideration of [the defendant’s] contention that the collateral consequences of his offense could serve, in his particular circumstances, to offset the need for lengthy imprisonment”). Mr. Gallagher’s 22-year marriage has ended. He lost the career that he built over the last 30 years. He lost his standing in the community, and countless friendships and professional networks. News outlets have reported his case. Mr. Gallagher has already suffered an atypical punishment for his crime. *See United States v. Gardellini*, 545 F.3d 1089 (D.C. Cir. 2008).

In *Gardellini*, the Court upheld a below-guidelines sentence that was based in part on the sentencing judge’s finding that the defendant had already “suffered substantially” due to his criminal prosecution and guilty plea for filing a false income tax return. The sentencing judge

based the variance on four facts: first, the defendant had already suffered substantially; second, the defendant posed a minimal risk of recidivism; third, the defendant had cooperated and fully accepted responsibility; and fourth, the district court opined that “what really deters” tax evaders is the “efforts of prosecutors . . . in vigorously enforcing the laws.” *Gardellini*, 545 F.3d at 1091. The D.C. Circuit held that these factors were all “directly relevant” to a Section 3553(a) analysis and fully justified the district court’s downward variance. In rejecting the government’s “deterrence” argument, the Court explained that “the government’s argument based on deterrence alone is flawed because it elevates one § 3553(a) factor – deterrence – above all others.” *Gardellini*, 545 F.3d at 1095.

Other than the conduct at issue here, Mr. Gallagher has led an honorable and responsible life. He has zero criminal history points. *See United States v. Autery*, 555 F.3d 864, 874 (9th Cir. 2009) (“because [the defendant’s] Criminal History Level I did not fully account for his complete lack of criminal history, considering it as a mitigating factor was not redundant or improper”) (citing *United States v. Rowan*, 530 F.3d 379, 381 (5th Cir. 2008)). He has admitted to his offense and is sincerely remorseful. *See Pauley*, 511 F.3d at 474 (the defendant was deeply remorseful); *United States v. Howe*, 543 F.3d 128, 132 (3d Cir. 2008) (upholding downward variance based, in part, on the defendant’s remorse).

Mr. Gallagher purchased the Kiawah lot with AFL funds. The lot has always been titled in the name of AFL and an attorney for AFL participated in the closing transaction for the purchase of the lot. AFL was able to sell the house, and the parties agree that AFL profited approximately \$4,000,000. PSR ¶ 31. This profit is calculated as follows:

- AFL purchased the land for \$4,000,000 and put it on its balance sheet. The amount of loss is \$2,545,068, which was misappropriated for the construction of the home. PSR ¶ 30. Therefore, the sub-total of AFL’s costs is approximately \$6,500,000.

- Mr. Gallagher used an additional \$2,400,000 of his personal funds for construction of the house.
- The house sold in September 2024 for \$11,600,000.
- AFL's profit equals \$11,600,000 (sale of the house) minus \$6,500,000 (sub-total of AFL's costs from above) minus approximately \$1,000,000 (property taxes and sales commission) = approximately \$4,000,000.

Mr. Gallagher is motivated, intelligent, and has an exemplary educational, work, and volunteer history. His conduct while on pretrial supervision has been exemplary. *See United States v. Schlosser*, 558 F.3d 736, 742 (8th Cir. 2009) (“[P]re-trial conduct, including conduct while free on bond, is an appropriate consideration under § 3553(a), because it is relevant to the history and characteristics of the defendant, and to the need for the sentence to promote respect for the law”) (citation and internal quotations omitted); *United States v. Shi Chang Huang*, 491 F. App'x 382, 385 (4th Cir. 2012) (unpublished) (district court properly considered the defendant's conduct while on pre-trial release); *United States v. Burgos*, 2015 WL 6447766, at *5 (N.D. Ind. 2015) (“[t]he Defendant's compliance on pre-trial supervision suggests his ability to avoid criminal conduct, without a need for a term of imprisonment”); *United States v. Cox*, 271 F. Supp. 3d 1085, 1090 (S.D. Iowa 2017) (downward variance based, in part, on defendant's conduct while on pre-trial release); *United States v. Schlosser*, 558 F.3d 736, 742 (8th Cir. 2009) (“[P]re-trial conduct, including conduct while free on bond, is an appropriate consideration under § 3553 because it is relevant to the history and characteristics of the defendant, and to the need for the sentence to promote respect for the law”) (internal quotations omitted).

Mr. Gallagher has accepted responsibility for his actions and he cooperated fully with the investigation. He met with FBI agents prior to charges being handed down and admitted his conduct. He pled guilty at his first pretrial status conference.

Mr. Gallagher is currently volunteering his time to help two companies, both of which are aware of his situation and pending sentencing. Mr. Gallagher's years of hard work, diligence, and service to the community warrant a sentence below the Guidelines range. *See Pauley*, 511 F.3d at 474 (besides the criminal conduct at issue, the defendant was "a good father and teacher"). It is extremely unlikely that he will commit a criminal offense again, and a sentence of non-incarceration would adequately protect the public.

For the reasons stated herein and in the Sentencing Video (Exhibit D), and for those that will be demonstrated at the sentencing hearing, Mr. Gallagher respectfully requests that this Court impose a sentence of non-incarceration.

Dated this 14th day of January, 2025

Respectfully submitted,

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EXHIBIT A

AFL Associates Present \$496000 to United Way of

3–4 minutes

Spartanburg, SC – [AFL](#), an international manufacturer of fiber optic cable, connectivity and accessories, completed its annual United Way campaign by presenting \$496,000 to [United Way of the Piedmont](#). The donation was made possible by AFL associates and AFL’s matching program which matches all donations up to \$100.

“I am inspired by the generosity of our associates. At a time when nonprofit organizations are still in dire need of financial support, our associates stepped up and owned the cause,” commented Jody Gallagher, CEO and President of AFL. “Community Engagement is one of our Core Values. It’s embedded in our culture and will forever be a part of who we are.”

The campaign theme, “Global Games—Give for the Gold,” coincided with the upcoming Tokyo Games, which is also the headquarters of AFL’s parent company, Fujikura Ltd. During the two-week campaign, associates learned more about the need in the community and were given opportunities to consider a donation. AFL realized a seven percent increase in donors over the previous year and 31 percent increase in financial contributions.

“AFL is an amazing corporate partner! Their generosity is a reflection of their culture,” stated Paige Stephenson, President & CEO of United Way

of the Piedmont. “We hold up AFL as a model for true corporate partnership. It is a year-round connection where associates are given the opportunity to invest their time and talent, as well as their treasure.”

[United Way of the Piedmont](#)’s mission is to connect, engage and inspire people to transform the community. By 2030, its goal is to decrease the number of individuals living below self-sufficiency by 11,000. As part of their work in education, financial stability and health, United Way of the Piedmont is committed to ensuring that the programs invested in, and the outcomes generated are equitable.

Locations worldwide conducted campaigns during the month of June, generating \$670,000 for AFL communities worldwide. This is a 36 percent increase over 2020 and a 27 percent increase in the number of donors.

AFL has an extensive [Community Outreach Program](#) that provides grants, sponsorships, associate engagement projects, disaster relief and more. For additional information on AFL and its community initiatives, visit www.AFLglobal.com.

About AFL

Founded in 1984, AFL is an international manufacturer providing end-to-end solutions to the energy, service provider, enterprise, hyperscale and industrial markets. The company’s products are in use in over 130 countries and include fiber optic cable and hardware, transmission and substation accessories, outside plant equipment, connectivity, test and inspection equipment, fusion splicers and training. AFL also offers a wide variety of services supporting data center, enterprise, wireless and outside plant applications.

Headquartered in Spartanburg, SC, AFL has operations in the U.S., Mexico, Canada, Europe, Asia and Australia, and is a wholly owned

subsidiary of Fujikura Ltd. of Japan. For more information, visit www.AFLglobal.com. Follow us on [LinkedIn](#), [X](#), [Facebook](#), and read our [blog](#).

Contact

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EXHIBIT B

whosonthemove.com (Published February 25, 2015)

Greenville business leaders help Habitat for Humanity - Who's On The Move

Kaitlyn Hudson

2–3 minutes

GREENVILLE, SC – A group of 17 business leaders came together Wednesday morning to kick-off the third annual Habitat for Humanity of Greenville County's 2015 CEO Build.

The concept for the CEO Build comes from that idea of personal leadership – to ask some of Greenville's most influential business leaders to come together to build a home for a family that normally would be unable to own a home, said Monroe Free, President and CEO of Habitat Greenville.

"It's about making a difference, one family at a time," he said. "It is important to understand the world around you. It's hard to lead without that knowledge. That is what the CEO Build does."

Participants in the 2015 campaign are:

Jody Gallagher, AFL Global; Bob Morris, Community Foundation of Greenville; John Boyanoski, Complete Public Relations; Joe Erwin, Erwin-Penland; Chuck Hinton, Ethox Chemicals; John Uprichard, Find Great People; James Brown, Fluor Corporation; Ben Haskew, Greenville Chamber of Commerce; David Doser, Greenville County Redevelopment Authority; Dr. Keith Miller, Greenville Technical College;

Jeff Beard, Heat Transfer; D.J. Rama, JHM Hotels; Don Erickson, Lockheed Martin; Delisa English, The Blood Connection; Seabrook Marchant, The Marchant Company; Ted Hendry, United Way of Greenville County and Steve Wetmore, Wal-Mart Distribution Center.

The home will be constructed in the Abigail Springs subdivision in Taylors. The homeowners will be the Kilgore family.

“Each member of the CEO Build will donate time and talent to the project during the next three months,” Free said. “And many of their employees will also participate.”

About Habitat for Humanity of Greenville County

Habitat for Humanity of Greenville County was chartered in 1985 and has partnered with 323 families to help them build a home of their own. Through affordable home construction, Habitat for Humanity of Greenville strives to eliminate poverty housing and the social and economic problems it causes. Habitat Greenville is recipient of the 2015 Nonprofit Excellence Award given by the SC Association of Nonprofit Organizations (SCANPO). Learn more at www.habitatgreenville.org.

What you can learn from the Habitat CEO Build

Guest Contributor

5–6 minutes

By Kaitlyn Hudson, Complete Public Relations

The CEOs of Greenville's top companies are familiar with building corporations, alliances, and nonprofits from the ground up.

But recently, 23 of those CEOs came together to raise the walls on a structure of a different kind – a home for the Delanuez family. This home is Habitat for Humanity of Greenville County's fourth CEO build, an annual event that unites companies from across business sectors to fund and construct a home for a Greenville family with low income. This year, the home will be in the Grace Point neighborhood in southern Greenville County. Each CEO's company supports support the build through both financial sponsorship and volunteer hours.

This is obviously a different kind of project and Habitat for Humanity took the Upstate Business Journal into the process of making it happen.

How do you get CEOs?

Planning for a CEO Build begins 8 to 10 months ahead of the wall raising for the home. Potential participants receive information about the projects, followed by personal contact by Monroe Free (Habitat

Greenville's president and CEO), Dick Wilkerson (Retired Michelin North America president and chair of the CEO Build) and Habitat development staff. The CEO Build is unique in that it offers leaders direct participation in changing the future for a Greenville family. As a testament to the CEOs experiences in the project, more than half of the 2016 participants have participated in prior CEO Builds

Where did the idea come from?

The CEO Build idea originated in 2012 as Habitat Greenville development staff discussed Habitat's funding model. At that time, build partners were approached to fund a full build. Many companies' employees volunteer on the build site, and the idea was to bring CEOs from these companies together to collectively fund the build and to give them and their employees the opportunity to be working on the build site together.

Who is involved this year?

Dick Wilkerson, CEO Build Chair (Michelin, Chairman & President, retired); **AFL Global**, Jody Gallagher, President and CEO; **Bon Secours St. Francis Health System**, Craig McCoy, CEO; **Community Foundation of Greenville**, Bob Morris, President; **Complete Public Relations**, John Boyanoski, President; **Design Strategies**, Ben Rook, President

Ethox Chemicals, LLC, Chuck Hinton, President; **Fluor Corporation**, James Brown, General Manager; **Fresh Water Systems, Inc.**, Steve Norvell, President; **GBS Building Supply**, Bob Barreto, CEO; **Greater Greenville Association of Realtors**, Mike Sabatine, CEO; **Greenville County Redevelopment Authority**, Stanley Wilson, Executive Director; **Greenville Health System**, Mike Riordan, President

& CEO; **Greenville Technical College**, Dr. Keith Miller, President; **Home Builders Association of Greenville**, Michael Dey, President & CEO; **JHM Hotels**, D.J. Rama, President; **Lockheed Martin**, Don Erickson, Site Director; **SC Telco Federal Credit Union**, Steve Harkins, CEO; **Southern Fried Green Tomatoes**, Kevin Baluch, Owner; **The Blood Connection**, Delisa English, President & CEO; **The Marchant Company**, Seabrook Marchant, President; **United Way of Greenville County**, Ted Hendry, President; **Wal-Mart Distribution Center**, Steve Wetmore, Operations Manager

What does success look like?

The success of the CEO Build is measured first, by the transformation of a family's future through affordable homeownership. In Habitat Greenville's 2015 homeowner impact survey, 70 percent of families reported that their children's grades have improved, 58 percent said that a member of their family had completed a degree or training program, and 32 percent that they have received a raise or a better job since moving into their home. The participation of Greenville's leaders also enhances Habitat's profile in the community and helps further its mission in the Greenville community. Finally, the success of the CEO Build project is measured by the overall benefits to the community: helping to improve neighborhoods and create stable families.

"Leaders participating in the CEO Build lend their credibility and reputation to further the mission of Habitat in the Greenville community," Free said. "We are truly grateful for their commitment to affordable homeownership."

What's next?

The CEO and people from their companies will build a house at Grace

Point, which is the first of seven homes that Habitat plans to build in this community off of Staunton Bridge Road, over the next three months. For more information on Habitat Greenville, go to habitatgreenville.org.

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greenvilleonline.com (Published March 6, 2017)

Executives to build Habitat home in Greenville

2–3 minutes

Twenty-three Upstate executives will break away from business to build a help build a home for Habitat for Humanity.

The executives will be participants in Habitat for Humanity of Greenville County's fifth annual CEO build.

The event unites companies of different sectors to fund and construct a home for a Greenville family making 30 to 60 percent of the Area Median Income. Each executive's company will support the build through both financial sponsorship and volunteer hours, a statement about the event said.

The kick-off was March 2.

The house is being constructed at 9 Hope Bridge Way in Greenville.

The year's CEO Build participants include the following:

Dick Wilkerson, CEO Build Chair (Michelin, Chairman & President, retired)

AFL Global, Jody Gallagher, President and CEO

Bon Secours St. Francis Health System, Craig McCoy, CEO

Community Foundation of Greenville, Bob Morris, President

Complete Public Relations, John Boyanoski, President

Ethox Chemicals, LLC, Chuck Hinton, President
Fluor Corporation, James Brown, General Manager
GBS Building Supply, Bob Barreto, CEO
Greater Greenville Association of Realtors, Mike Sabatine, CEO
Greenville County Redevelopment Authority, Stanley Wilson, Executive Director
Greenville Health System, Kevin McBride, Director, GHS Military and Government Liaison Office
Greenville Technical College, Dr. Keith Miller, President
Home Builders Association of Greenville, Michael Dey, President and CEO
JHM Hotels, D.J. Rama, President
Lockheed Martin, Don Erickson, Site Director
Meritage Homes, Patrick Murphy, Division President
REWA, Graham Rich, Executive Director
SC Telco Federal Credit Union, Steve Harkins, CEO
Southern Fried Green Tomatoes, Kevin Baluch, Owner
The Blood Connection, Delisa English, President and CEO
The Marchant Company, Seabrook Marchant, President
United Way of Greenville County, Ted Hendry, President
Urban League of the Upstate, Jil Littlejohn, President and CEO
Wal-Mart Distribution Center, Steve Wetmore, Operations Manager
Learn more at www.habitatgreenville.org.

wspa.com (Published June 14, 2018)

Upstate CEOs roll up sleeves to build home for family

WSPA 7News

~3 minutes

GREENVILLE Co., S.C. (WSPA) — Habitat for Humanity of Greenville County is holding a home-build and community dedication.

It's the second CEO build of the year.

The Powers family, including single mom Betty and her son Quinn, will receive the home.

Quinn, 24, was born with Cerebral Palsy and Hydrocephalus a condition caused by excess fluid on the brain.

The apartment where the family currently lives is crowded and Betty said leaks in the ceiling could make it unsafe.

Habitat for Humanity is working with Patty to make sure she learns budgeting techniques and is able to afford future housing expenses.

The dedication will be held at Grace Point Community church on Hope Bridge Way at 11:30 a.m. Friday, June 15.

Here is a list of participating CEOs and companies involved in the home build:

AFL — Jody Gallagher, President & CEO

Auro Hotels — DJ Rama, President & CEO

Bon Secours St. Francis Health System – Craig McCoy, CEO
Community Foundation of Greenville – Bob Morris, President
Complete Public Relations – John Boyanoski, President
Corley Plumbing Air Electric – Chris Corley, Owner
Eastern Industrial Supplies – Kip Miller, President & CEO
Ethox Chemicals, LLC – Chuck Hinton, President
Find Great People – John Uprichard, CEO
Fluor – James Brown, Greenville Office Vice President & General Manager
Greenville County Redevelopment Authority – Doug Dent, CEO
Greater Greenville Association of Realtors – Nick Sabatine, CEO
Greenville Chamber – Carlos Phillips, President & CEO
Greenville Health System – Mike Riordan, CEO of the Strategic Coordinating Organization
Greenville Technical College – Dr. Keith Miller, President
KC Max Creations – Kevin Corbitt, CEO
Lockheed Martin – Don Erickson, Site Director
Meritage Homes – Steve Hahn, Division President
Renewable Water Resources – Joel Jones, Chief Technical Officer
SC Telco FCU – Steve Harkins, President & CEO
Southern Fried Green Tomatoes – Kevin Baluch, Owner
Southern Harmony, LLC – James Covington, Jr. (Josh), Owner/Operator
Spinx – Steve Spinks, CEO
Ten at the Top – Dean Hybl, Executive Director
The Blood Connection – Delisa English, President & CEO
The Marchant Company – Seabrook Marchant, Owner
United Way of Greenville County – Meghan Barp, President & CEO
Wal-Mart Distribution – Maurice Nunn, Assistant General Manager
Warehouse Services, Inc – Barry Cox, President & COO

EXHIBIT C

[greenville.com](https://www.greenville.com) (Published March 17, 2023)

St. Paddy's Day Dash and Bash Returns for 2023 - Greenville.com

~3 minutes

Friday, March 17, 2023

AFL in partnership with The Greenville Drive and Palmetto Children's Charity is bringing back the exciting St. Paddy's Day 5K Dash & Bash on March 18, 2023, in downtown Greenville!

The 5K / 1 Mile Walk & Party will benefit Camp Spearhead & IDefine, two local charities renown in the Greenville community for their passionate missions.

Since 1968 Camp Spearhead has offered the opportunity for a positive camp life experience, making friends and "getting away from it all" for a few days for children and adults with special needs. Operated by Greenville County Recreation, Camp Spearhead has been a staple in the community and an important aspect of life for hundreds of campers throughout the years.

Founded in 2020 by a group of parents seeking better answers for their children and families living with a Kleefstra Syndrome (KS) diagnosis, IDefine is a nonprofit organization that exists to provide a central community for families affected by KS. IDefine provides information, advocacy, and pools resources to support life-changing treatment and intervention.

As a pillar in the Greenville community, AFL CEO, Jody Gallagher, reflects on why these charities mean so much. “Our core values, especially Community Engagement, have always led us in believing we can help grow, improve, and sustain our communities. Both IDefine and Camp Spearhead seek to do the same through their tireless commitment to establishing thriving communities for those they serve. Greenville and the Upstate are beyond thankful to have these charities and the wonderful experiences they provide for all who need them.”

With the great cause of raising money for Camp Spearhead & IDefine, friends and families of all ages are welcome to register for this action packed day in downtown Greenville.

The 5K / 1 Mile route will take participants through parts of downtown and finish around the track inside Fluor Field! If the race isn't your cup of tea, come to the Bash inside the 500 Club at Fluor Field. There will be a raffle, music, dancing, costume & dance contests, and more.

All 5K / 1 Mile registrations include 1 raffle ticket, 1 beer (age 21+ with ID) and shirt. Bash tickets include 1 raffle ticket and 1 beer (age 21+ with ID.)

For more information about Camp Spearhead or IDefine and to register for the race, please visit www.5kdashandbash.com.

EXHIBIT D

Sentencing Video
(Emailed to Court and Government)