

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>vs.</b>	)	
	)	
<b>TODD CHRISLEY,</b>	)	<b>Criminal Indictment</b>
<b>JULIE CHRISLEY, and</b>	)	<b>No. 1:19-CR-297-ELR-JSA</b>
<b>PETER TARANTINO,</b>	)	
	)	
<b>Defendants.</b>	)	
_____	)	

**DEFENDANT JULIE CHRISLEY’S MEMORANDUM  
IN SUPPORT OF A BELOW-GUIDELINE SENTENCE**

Defendant Julie Chrisley respectfully submits her Memorandum in Support of a Below-Guideline Sentence as follows:<sup>1</sup>

**I. INTRODUCTION**

On June 7, 2022, Ms. Chrisley was convicted on charges of conspiracy to commit bank fraud, bank fraud, wire fraud, conspiracy to defraud the Government, tax evasion, and obstruction of justice. Ms. Chrisley submits this memorandum to assist the Court in imposing a sentence that is “sufficient, but not greater than necessary,” to comply with the sentencing purposes set forth in 18 U.S.C. § 3553(a).

As shown in Ms. Chrisley’s Corrections and Objections to the Presentence Investigation Report, dated October 24, 2022 (“PSR Objections”), the evidence

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<sup>1</sup> Julie Chrisley is separately filing a Memorandum more specifically addressing the government’s loss and restitution calculations.

presented at trial regarding the bank fraud counts does not support any enhancement of the base offense levels as recommended in the PSR, because there was no evidence presented at trial that Ms. Chrisley participated in or had any role in securing the bank loans at issue. The evidence shows Ms. Chrisley had a minimal role in the charged conspiracy and no role at all during the time period the loans addressed in the PSR were obtained. In fact, the government has failed to show Ms. Chrisley joined a conspiracy regarding the loans at issue at the time they were procured. Additionally, the trial evidence does not support a finding that Ms. Chrisley intended any loss to the banks at issue.

While Ms. Chrisley should not be assigned any loss related to the subject bank loans for sentencing purposes, the government's bank loss calculations, among other things, fail to account for Ms. Chrisley's lack of involvement in any of the loans, monies recovered on the loans, monies paid by banks acquiring these loan assets from the FDIC (i.e. how much the companies paid and how much they profited), and interest and penalties allegedly owing on these loans. These failures result in the government's gross overstatement of its loss calculation. Additionally, the government's failure to account for these issues and its failure to support its loss calculations shows the government has not borne its burden of proving the bank loss by a preponderance of the evidence. *See* 18 U.S.C. § 3664(e).

An analysis of the factors set forth in 18 U.S.C. § 3553(a) shows a reasonable sentence for Ms. Chrisley does not include incarceration. She has never before been convicted of any crime, the likelihood of her ever committing another crime in the future is nil, she had a minimal role in the offenses charged, she has proved to be an asset to her community, and, most importantly, she has extraordinary family obligations that would make her incarceration unjust. In light of these mitigating factors, a reasonable sentence for Ms. Chrisley would be probation with special conditions.

## **II. INITIAL ADVISORY GUIDELINE CALCULATION**

The PSR calculates Ms. Chrisley's sentencing options under the Sentencing Guidelines at a Total Offense Level of 38 with a corresponding sentencing range of 235-293 months incarceration, plus a fine, restitution, and forfeiture. In its Sentencing Memorandum (Doc. 305), the government recommends a Total Offense Level of 32 for Ms. Chrisley with a corresponding sentencing range of 121-151 months incarceration. As detailed in Ms. Chrisley's PSR Objections, the correct sentencing range is much lower than the government contends.

As to Counts 1 through 6 (bank fraud and conspiracy to commit bank fraud), there should be no enhancement of the base offense level of 7 because there is no evidence Ms. Chrisley participated in or had any role in securing the loans at issue,

and no loss should be attributed to her.<sup>2</sup> The government concedes there should be no sophisticated means enhancement for Ms. Chrisley and no two-level enhancement for 10 or more victims. *See* Doc. 305 at 2 n.1.

The government further recommends a 20-level enhancement (instead of the 22-level enhancement stated in the PSR) for total loss amount based on evidence of “the Chrisleys’” conspiracy and “the conspirators’” actions. *See id.* at 5-12. The government points to no evidence, however, showing Ms. Chrisley created or submitted any false bank statements or financial statements related to the bank loans at issue, obtained a loan from any of the banks at issue, or participated in securing any bank loans at issue. The bank statements, financial statements, and other evidence to which the government points as establishing Ms. Chrisley’s “involvement from the scheme’s inception” in fact do not show that; rather, they merely show Ms. Chrisley made payments on loans and that money was deposited into bank accounts “under the control of both Julie and her husband.” *Id.* at 14. Loan payments do not establish a conspiracy.

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<sup>2</sup> The probation officer’s repeated contention to the contrary in the November 8, 2022, Presentence Investigation Report (“Revised PSR”) is not supported by the evidence the probation officer cites. *See* Revised PSR at, e.g., 10-12, 15-16. Rather, the evidence shows at most that Ms. Chrisley had a role in making payments on loans that had already been obtained, but that she did not create or submit any false documents to the banks or obtain a loan from any of the banks. Ms. Chrisley’s PSR Objections are equally applicable to the Revised PSR.

Similarly, because there is no evidence of Ms. Chrisley’s involvement in obtaining the loans at issue, there should be no two-level enhancement for her “deriv[ing] more than \$1,000,000 in gross receipts from one or more financial institutions as a result of the offense.” *Id.* at 23 (quoting U.S.S.G. § 2B1.1(b)(17)(A)). There also should be no enhancement for obstruction of justice because the only conduct the PSR cites in support of this enhancement related to the bank fraud and conspiracy counts relates to the investigation and prosecution of the tax counts—not bank fraud.

Moreover, Ms. Chrisley should receive a four-level reduction, pursuant to U.S.S.G § 3B1.2, because she is “plainly among the least culpable of those involved in the conduct of a group” charged with these counts.<sup>3</sup> Ms. Chrisley’s Adjusted Offense Level for Counts 1 through 6, therefore, should be 3.

As to Count 8 (conspiracy to defraud the U.S. to obstruct and impede the Internal Revenue laws) and Count 9 (tax evasion), there should be no enhancement of the base offense levels of 20 because there is no evidence Ms. Chrisley employed sophisticated means or obstructed justice as described in PSR ¶¶ 139 and 144. The government contends the sophisticated means enhancement is warranted because the

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<sup>3</sup> The government disagrees with this but still points to no evidence showing Ms. Chrisley submitted any false bank statements or financial statements related to the bank loans at issue, obtained a loan from any of the banks at issue, or participated in securing any bank loans at issue. *See* Doc. 305 at 25-27.

Chrisleys used 7C's Productions as a "shell company ... to shelter their income from the IRS" and falsely represented Faye Chrisley as the owner of 7C's. Doc. 205 at 29-30. As set forth in Ms. Chrisley's PSR Objections, the government's contention ignores evidence contextualizing the creation and purpose of 7C's that demonstrates no sophisticated means enhancement is warranted for Ms. Chrisley. *See* PSR Objections at 14 ¶¶ 88, 93, 94.

The government seems to believe an allegation with no proof of participation is enough for this Court to throw the book at Ms. Chrisley. The problem for the government is that all the actions attributable to Ms. Chrisley alleged in the bank fraud and tax counts of the Indictment, including obstruction, postdate all the loans at issue. Properly applying the Sentencing Guidelines, the Total Offense Level for Ms. Chrisley should be 20, with a custody Guideline range of 33-41 months and a fine Guideline range of \$15,000-\$150,000. In addition, Ms. Chrisley should not be held jointly and severally liable for any restitution, and there should be no forfeiture, because she did not personally obtain any proceeds of the bank fraud offenses.

### **III. SENTENCING PROCEDURE AND STANDARDS**

To establish the "initial benchmark," the Court "should begin all sentencing proceedings by correctly calculating the applicable Guidelines range." *Gall v. United States*, 552 U.S. 38, 49 (2007). The Guidelines, however, "are not only *not mandatory* on sentencing courts; they are also not to be *presumed* reasonable."

*Nelson v. United States*, 555 U.S. 350, 352 (2009) (emphasis in original); *see also Rita v. United States*, 551 U.S. 338, 351 (2007) (holding a sentence within Guidelines range is neither per se reasonable nor entitled to presumption of reasonableness at district court level). The Court may not rely exclusively on a Sentencing Guidelines calculation, therefore, and it may not impose a lawful sentence based on an assumption the Sentencing Guidelines calculation is reasonable. The Supreme Court has emancipated the sentencing court from the Guidelines' mandatory restrictions and eliminated references to the "heartland" concept.

Because "[t]he Guidelines are not the only consideration," the sentencing judge, "after giving both parties an opportunity to argue for whatever sentence they deem appropriate, ... should then consider all of the § 3553(a) factors to determine whether they support the sentence requested by a party." *Gall*, 552 U.S. at 49-50. The judge must independently evaluate the appropriate sentence in light of the § 3553(a) purposes and factors and must consider arguments the Guidelines should not apply on general policy grounds, case-specific grounds (including Guideline-sanctioned departures), or "because the case warrants a different sentence regardless." *Rita*, 551 U.S. at 351. And section 3553(a)(3) "directs the judge to consider sentences other than imprisonment." *Gall*, 552 U.S. at 59.

The Court “must make an individualized assessment based on the facts presented” and “must adequately explain the chosen sentence to allow for meaningful appellate review and to promote the perception of fair sentencing.” *Gall*, 552 U.S. at 50. The Supreme Court in *Gall* reemphasized the broad latitude and discretion entrusted to the Court at sentencing and that the sentencing judge is free to make downward variances if any of the factors enunciated in 18 U.S.C. § 3553(a) are met. *See Gall*, 552 U.S. at 58-60. Thus, the Court may craft a fair and just decision on the reasonableness of a sentence that is outside the Guideline range based on the individual facts and circumstances of the case. *See Koon v. United States*, 518 U.S. 81, 113 (1996) (“It has been uniform and constant in the federal judicial tradition for the sentencing judge to consider every convicted person as an individual and every case as a unique study in the human failings that sometimes mitigate, sometimes magnify, the crime and the punishment to ensue.”). As the Second Circuit aptly stated, “the Sentencing Guidelines do not displace the traditional role of a district judge in bringing *compassion* and *common sense* to the sentencing process. ... [D]istrict courts should not hesitate to use their discretion in devising sentences that provide *individualized justice* ....” *United States v. Williams*, 65 F.3d 301, 309-10 (2<sup>nd</sup> Cir. 1995) (emphasis added; citation and punctuation omitted).

“No limitation shall be placed on the information concerning the background, character, and conduct of a person convicted of an offense which a court of the

United States may receive and consider for the purpose of imposing an appropriate sentence.” *United States v. Booker*, 543 U.S. 220, 251 (2005). Accordingly, this Court may consider factors that the Guidelines discourage, limit, or reject, such as Ms. Chrisley’s Mental and Emotional Conditions (§ 5H1.3), Employment Record (§ 5H1.5), Family Ties and Responsibilities (§ 5H1.6), Role in the Offense (§ 5H1.7), and Criminal History/Unlikelihood of Recidivism (§ 5H1.8).

The Court may sentence Ms. Chrisley below the Guidelines range as long as such a reduction is not unreasonable in light of all of the § 3553(a) factors. *See Booker*, 543 U.S. at 244-45. Under *Booker*, the Guidelines are merely “advisory,” and sentencing courts are required to consider all the factors listed in 18 U.S.C. § 3553(a) in imposing a sentence. *See id.* at 245. The Court therefore may craft a fair and just decision on the “reasonableness” of a sentence that is outside the sentence range suggested by the PSR.

As shown by the evidence at trial, Ms. Chrisley was a minimal player in the bank fraud, tax fraud, and conspiracy counts of the Superseding Indictment, and she has no history of criminality apart from that charged in the Superseding Indictment. *See* 18 U.S.C. § 3553(a)(1). Additionally, while Ms. Chrisley acknowledges the jury verdict, her sentence need not be severe, as there is no evidence Ms. Chrisley will ever again commit any crime and thus the public is at no risk of Ms. Chrisley doing so in the future. *See* 18 U.S.C. § 3553(a)(2).

#### IV. ALTERNATIVE SENTENCING OPTIONS

The Supreme Court has approved the substitution of probation for a custodial sentence in appropriate cases:

We recognize that custodial sentences are qualitatively more severe than probationary sentences of equivalent terms. Offenders on probation are nonetheless subject to several standard conditions that substantially restrict their liberty. *See United States v. Knights*, 534 U.S. 112, 119 (2001) (“Inherent in the very nature of probation is that probationers do not enjoy the absolute liberty to which every citizen is entitled.”). Probationers may not leave the judicial district, move, or change jobs without notifying, and in some cases receiving permission from, their probation officer or the court. They must report regularly to their probation officer, permit unannounced visits to their homes, refrain from associating with any person convicted of a felony, and refrain from excessive drinking. USSG § 5B1.3. Most probationers are also subject to individual “special conditions” imposed by the court.

*Gall*, 552 U.S. at 48 (citations omitted).

Since *Booker* and *Gall*, courts have been increasingly receptive to imposing below-Guidelines sentences based on subjective analysis of the 18 U.S.C. § 3553 factors and potential alternative sentences. *See United States v. Gardellini*, 545 F.3d 1089, 1094 (D.C. Cir. 2008) (collecting cases illustrating affirmance of below-Guideline sentences under *Gall* “reasonableness” standard). In *United States v. Tomko*, 562 F.3d 558 (3<sup>rd</sup> Cir. 2009) (en banc), for instance, after pleading guilty to evading over \$228,000 in income taxes, the defendant received a below-Guidelines split sentence of probation, home confinement, community service, restitution, and a fine. *See* 562 F.3d at 563. The defendant had one prior conviction with Criminal

History I and offense level of 13 (12-18 months incarceration). The Third Circuit affirmed the district court's individualized assessment of the § 3553 factors and upheld the reasonableness of the non-custodial sentence. *See id.* at 563-567; *see also United States v. Del Campo*, 695 Fed. Appx. 453, 458-59 (11<sup>th</sup> Cir. 2017) (affirming sentence of five years supervised release, instead of Guideline range of 46-57 months imprisonment, for defendant convicted of three counts of bank fraud who had no prior criminal history where Guideline sentence was unnecessary to effect deterrence); *United States v. Hosein*, 581 Fed. Appx. 199, 201 (4<sup>th</sup> Cir. 2014) (affirming sentence of supervised release for defendants convicted of bank fraud, conspiracy to commit bank fraud, and making false statements to obtain a loan); *United States v. Gray*, 453 F.3d 1323, 1325 (11<sup>th</sup> Cir. 2006) (affirming below-Guidelines sentence based upon defendant's age, prior minimal criminal record, and medical condition); *United States v. Lahey*, 186 F.3d 272, 275 (2<sup>nd</sup> Cir. 1999) (holding district court had authority to sentence defendant convicted of bank fraud to three years supervised release given his family circumstances and responsibilities).

In light of these standards, and for the reasons set forth below, a below-Guidelines sentence for Ms. Chrisley of probation with other special conditions is sufficient, but not greater than necessary, to achieve the goals of § 3553(a).

## V. REQUEST FOR A BELOW-GUIDELINE SENTENCE

The offenses of which Ms. Chrisley was convicted are serious federal offenses, and she is mindful her conduct and the potential negative impact of her actions are not to be taken lightly. In imposing a reasonable and appropriate sentence, Ms. Chrisley requests the Court to consider several mitigating factors.

Imposing a sentence on a fellow human being is a formidable responsibility. It requires a court to consider, with great care and sensitivity, a large complex of facts and factors. The notion that this complicated analysis, and moral responsibility, can be reduced to the mechanical adding-up of a small set of numbers artificially assigned to a few arbitrarily-selected variables wars with common sense. Whereas apples and oranges may have but a few salient qualities, human beings in their interactions with society are too complicated to be treated like commodities, and the attempt to do so can only lead to bizarre results.

*United States v. Gupta*, 904 F. Supp. 2d 349, 350 (S.D.N.Y. 2012).

Ms. Chrisley respectfully requests the Court impose a non-custodial sentence that includes a combination of probation, restitution, and community service. This below-Guidelines sentence is reasonable and reflects the seriousness of Ms. Chrisley's offenses and meets the needs of the public while taking into consideration such mitigating factors as her extraordinary family obligations, her minimal role in the bank fraud conspiracy, and the absence of factors generally found in cases in which defendants have been sentenced to incarceration.

**A. Mitigating Factors Supporting a Below-Guidelines Sentence**

As explained in Ms. Chrisley’s PSR Objections, which are equally applicable to the Revised PSR, the trial evidence shows Ms. Chrisley’s role in the case was limited and she had the least involvement among all the conspirators in the actions giving rise to the charges. No evidence was presented at trial that Ms. Chrisley created or submitted any false bank statements or financial statements related to the bank loans at issue, that she obtained a loan from any of the banks at issue, or that she participated in securing any bank loans at issue. The evidence shows Ms. Chrisley did not join the conspiracy until many years after the loans addressed in the PSR were obtained, and that she had a minimal role in the conspiracy and no role at all during the time the loans addressed in the PSR were obtained.

Importantly, Ms. Chrisley’s extraordinary family obligations counsel in favor of a below-Guidelines sentence. *See* U.S.S.G. § 5H1.6. Ms. Chrisley and her husband, co-defendant Todd Chrisley, have three children together, including Grayson Chrisley, who is 16 years old and in high school. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The Chrisleys also have full custody of their ten year old granddaughter, Chloe Chrisley, whose father, Kyle Chrisley, is Todd's son from a prior marriage.

[REDACTED]



Ms. Chrisley has the love and respect of her family and friends, who have submitted approximately [REDACTED] letters of support attesting to Ms. Chrisley's character for this Court's consideration (copies of which are attached as collective **Exhibit C**). These letters show Ms. Chrisley is hard-working, unfailingly selfless, devoted to her family and friends, highly respected by all who know her, and strong of character. They describe her among other things as "honest and sincere in every way" and "greatly respected in [her] community;" a cancer survivor who unhesitatingly aids and comforts others dealing with cancer and other medical traumas, including by bringing them home-cooked meals; a volunteer helping foster children with the Tennessee Alliance for Kids; the "caretaker" of her family and friends and community; "the nucleus, the core, the heartbeat to all who[] love her;" and "the glue that holds everyone together."

Her friends and family, and indeed the public in general, would be much better served if Ms. Chrisley is given a non-custodial sentence. As one of Ms. Chrisley's friends summed it up, "We need more role models in our communities like [her], not less." Letter from Lee White, attached within collective **Exhibit C**.

During the entirety of the time since 2016 that Ms. Chrisley has been on bond pending trial and after conviction, she has been a model probationer. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**B. Incarceration Is Unnecessary for Deterrence**

“In determining the particular sentence to be imposed, a sentencing court is required to consider, among other factors, ‘the need for the sentence imposed to protect the public from further crimes of the defendant,’ and ‘to afford adequate deterrence to criminal conduct.’ Those sentencing factors cover both specific deterrence and general deterrence.” *United States v. Howard*, 28 F.4th 180, 208 (11<sup>th</sup> Cir. 2022) (quoting 18 U.S.C. § 3553(a)(2)(B), (C)) (citation and punctuation omitted).

As to specific deterrence, the likelihood a defendant will engage in future criminal conduct is “a central factor that district courts must assess when imposing sentence.” *Pepper v. United States*, 562 U.S. 476, 492 (2011) (citing 18 U.S.C. § 3553(a)(2)(B)-(C)). Ms. Chrisley, a first time offender, has no prior criminal record and is therefore at very low risk of recidivism. This case is an isolated event in Ms. Chrisley’s life-long abidance of the law. Moreover, the Government’s investigation and prosecution of Ms. Chrisley, as well as her trial and conviction, were widely

reported by media across the country, publicly humiliating her. This damage to Ms. Chrisley's reputation serves as additional deterrence. The "scarlet letter" of the federal conviction she will bear for the rest of her life, combined with the prospect of being incarcerated away from her family, has deepened her respect for the law, ensuring she will never engage in recidivist behavior. *See Gall*, 552 U.S. at 59 ("Gall's self-motivated rehabilitation ... lends strong support to the conclusion that imprisonment was not necessary to deter Gall from engaging in future criminal conduct or to protect the public from his future criminal acts."). Thus, protecting the public from further crimes by Ms. Chrisley is not a concern. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

As to general deterrence, "even if criminals are rational actors and general deterrence worked to decrease the likelihood of criminal action by increasing the probability and severity of punishment, surely what effects general deterrence ... is the probability and *expected* severity of punishment attending a given offense, rather than the extent of an upward or downward variance in an outlier case." *Del Campo*, 695 Fed. Appx. at 459 (emphasis in original). There is no reason to believe a below-Guidelines sentence for Ms. Chrisley "will in any way affect the *expected* sentence

to be handed down for committing bank fraud” and similar offenses. *Id.* (emphasis in original). Whether Ms. Chrisley “receives a sentence of probation surely cannot meaningfully affect whether would-be criminals ... decide that their own potential criminal activity is worth the risk of being caught and punished.” *Id.* Because a sentence within the original Guidelines range will not serve the needs of the public any better than the requested non-custodial sentence, the sentence proposed by the PSR is greater than necessary to comply with the purposes of § 3553(a)(2).

**C. An Alternative Sentence Better Satisfies the Purpose of Rehabilitation**

After *Booker*, courts need not impose imprisonment, but may use a non-prison alternative that better satisfies the purposes of punishment, including the need for treatment, medical care, or rehabilitation in the most effective manner. In fact, the Sentencing Reform Act “rejects imprisonment as a means of promoting rehabilitation.” *Mistretta v. United States*, 488 U.S. 361, 367 (1989) (citing 28 U.S.C. § 994(k) (“The Commission shall insure that the guidelines reflect the inappropriateness of imposing a sentence to a term of imprisonment for the purpose of rehabilitating the defendant ....”). Given § 994(k)’s dictate that rehabilitation is only proper outside a prison setting, an alternative sentence for Ms. Chrisley of probation and community service serves the rehabilitative goals of punishment better than a prison sentence.

**D. An Alternative Sentence Better Enables Restitution**

A non-custodial sentence for Ms. Chrisley will also advance the public's interest in receiving payment of restitution and any fine. *See* 18 U.S.C. § 3553(a)(7). Ms. Chrisley currently receives income from her work on “Chrisley Knows Best” and the “Chrisley Confessions” podcast. As the PSR states, Ms. Chrisley “does not have the ability to pay a fine in addition to the total amount of restitution and federal tax payments due in this case instanter. However, [s]he may be able to pay a fine in addition to restitution and tax payments on a payment schedule.” PSR ¶ 188.

If Ms. Chrisley is sentenced within the Guidelines, however, she will undoubtedly lose this work, her income, and all ability to pay restitution, tax payments, or any fine. If Ms. Chrisley is given a sentence of probation, on the other hand, she will be able to continue working and earning income, so she can pay restitution and tax payments on a payment schedule, thereby satisfying the goal of § 3553(a)(7).

**E. The Combination of Extraordinary Factors Allows a Downward Departure**

If the Court determines none of the grounds submitted above standing alone forms a valid basis for a downward departure, the Court nevertheless may consider whether any combination of factors would authorize a downward departure. *See United States v. DeVegter*, 439 F.3d 1299, 1308 (11<sup>th</sup> Cir. 2006) (“The sentencing Guidelines envision situations in which a combination of departure factors could

result in a departure, even if none of the factors taken individually would warrant a departure.”). In fact, the Sentencing Commission endorses the policy of affording the sentencing court wide latitude and discretion in examining factors for a downward departure. *See* U.S.S.G. § 5K2.0(c) (“The court may depart from the applicable Guideline range based on a combination of two or more offender characteristics or other circumstances, none of which independently is sufficient to provide a basis for departure ....”).

The combination of factors set forth above authorizes a sentence for Ms. Chrisley that recognizes the severity of her offenses and respects the reality of her circumstances. A below-Guidelines sentence of probation and accompanying conditions is warranted.

**F. If the Court Imposes a Sentence that Includes Incarceration, Ms. Chrisley Requests the Court to Impose a Split Sentence**

If the Court determines a sentence for Ms. Chrisley that falls within Zone C of the Sentencing Table, and if the Court is inclined to impose a period of incarceration, Ms. Chrisley would request the Court to impose a split sentence under U.S.S.G. § 5C1.1(d)(2). Specifically, Ms. Chrisley would request the Court to impose a sentence consisting of a period of imprisonment followed by home detention or supervised release.

**G. If the Court Imposes any Sentence that Includes Incarceration, Ms. Chrisley Requests the Court to Delay or Stagger the Confinement**

If the Court determines a sentence including a period of incarceration is warranted for Ms. Chrisley, and in the event Todd Chrisley is also sentenced to a period of incarceration, Ms. Chrisley requests that her incarceration and Mr. Chrisley's incarceration be staggered to allow Ms. Chrisley to remain on supervised release until Mr. Chrisley finishes serving his sentence or, in the alternative, until Chloe Chrisley finishes high school or turns 18 years old. As discussed above, both Chloe and Grayson are substantially dependent on Ms. Chrisley and Mr. Chrisley for their wellbeing. Were both parents to serve incarceration at the same time, it would cause an extreme hardship on both these minor children.

“Staggered sentences allow[] for one parent to remain with the children while the other parent is serving a period of incarceration.” *United States v. Lanier*, No. 2:14-CR-83, 2016 WL 8710017, \*5 (E.D. Tenn. Dec. 16, 2016) (citing *United States v. Gary*, 613 F.3d 706 (7<sup>th</sup> Cir. 2010)). In circumstances such as those presented here, staggered sentences are warranted. *See id.*

**VI. CONCLUSION**

For the foregoing reasons, Ms. Chrisley respectfully requests the Court to exercise its discretion and downwardly depart from the advisory Guidelines sentence and impose instead a combined sentence of a term of probation, restitution, and

community service. Alternatively, Ms. Chrisley requests the Court to impose a split sentence of incarceration followed by home detention, pursuant to U.S.S.G. § 5C1.1(d)(2).

Respectfully submitted,

/s/ Christopher S. Anulewicz

Christopher S. Anulewicz

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*Attorneys for Julie Chrisley*

**CERTIFICATE OF COUNSEL REGARDING FONT SIZE**

Counsel certifies that the foregoing has been prepared using Times New Roman font size 14 in accordance with Local Rules 5.1(C) and 7.1(D).

This 16<sup>th</sup> day of November, 2022.

/s/ Christopher S. Anulewicz  
Christopher S. Anulewicz  
Georgia Bar No. 020914

**CERTIFICATE OF SERVICE**

I hereby certify that on the 16<sup>th</sup> day of November, 2022, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system and will email a copy of such filing to all counsel of record.

/s/ Christopher S. Anulewicz  
Christopher S. Anulewicz  
Georgia Bar No. 020914

# **EXHIBIT C**

Honorable Eleanor L. Ross  
Judge United States District Court  
October 24, 2022

Dear Judge Ross,

My name is Steve Arneson, and I am a South Carolina licensed professional counselor and Christian life coach writing on behalf of my client and friend Julie Chrisley. I have known Julie since August 19, 2019.

During my almost weekly sessions with Julie over the past 3 years, I have found her very kind and warmly engaging. She has a huge heart for her family, friends, co-workers, and strangers on the street. She would be diagnosed as a recovering people pleaser / co-dependent. The good traits of Julie are summarized as desiring to set others up for success, while unfortunately doing these desires to her own detriment. While these traits can be noble and selfless at times, they can also be a liability in terms of self-care.

What I want you to know Judge Ross, is that Julie is a person who desires to always do her best in every situation. She gets this from her personal relationship with her Lord and Savior Jesus Christ. Julie knows she falls short of glory daily like every Christian, but she strongly desires to live a life worthy of her calling to follow Jesus and strives to improve her walk as much as possible.

Julie is a compassionate person and I want you to know Judge that after her husband's deposition in their trial against the Georgia Department of Revenue where he and the opposing attorney got predictably sideways, she came across the same attorney whose car was broken down outside their meeting and gave the attorney a ride to safety. This was not an act of manipulation to gain favor, but one of simply loving thy neighbor and being a good Samaritan.

I recognize that Julie has been convicted of transgressions, yet even with that, I believe her to be a delightful person and I have both personal and professional confidence in her character.

Sincerely, Steve Arneson



Lake Murray Counseling and Christian Life Coach

630 Old Salem Road  
Seneca, SC 29672

October 25, 2022

To The Honorable Eleanor L. Ross:

It is an honor to write a character letter on behalf of my childhood and life-long friend, Julie Chrisley. Growing up in a small town together affords you the opportunity to know people better than when in large towns or cities. Julie is the daughter of a preacher. I have always admired that she wasn't your typical "PK," Preacher's Kid, when we were growing up. She has always owned her own faith and lived it.

As far as faith is concerned, I don't listen to what people say, I watch what they do and I have found there to be so much fruit in Julie's life. She is one of the kindest and most hard working people I have ever known. Her disposition is quiet and calm and she is a really great listener. She is also known for being generous. Over the years we have shared our victories and our trials all the while praying for and encouraging one another.

She has listened to me for countless hours as I have lived through some serious medical issues with my children. Several summers ago, when my son, age 28, was recovering from a second major medical issue, she came to our hometown and helped us in his Pelican's SnoBall business while he was home recovering.

She has the gift of wisdom and encouragement. I have personally watched her genuineness with strangers who were seeking a photo with her and how she spent time getting to know those people. She is patient and kind to everyone. I have also welcomed the sound advice she has offered my adult children at times.

I love watching her with her granddaughter, Chloe, who is not even her biological grand daughter. She came to live with Julie and Todd when she was just 12 months old. Chloe has been with them ever since. Julie's great care of Chloe is as if she was her own child. Her dedication to taking care of her family, her aging parents and Todd's mom, who is battling cancer, amazes me. She continues to work full time and make time for friends and strangers in the midst of it all. I am extremely proud to call Julie one of my best friends. I am prayerfully asking you to consider my character reference for her as you examine this case closely and the sentencing. Julie is truly that friend who sticks closer than a brother.

Sincerely,

A rectangular box containing a handwritten signature in cursive script that reads "Sherry Bradshaw".

Sherry Bradshaw

Honorable Eleanor L. Ross,  
Judge  
United States District Court

I would like to thank you for taking the time to read my letter regarding my dear friend and mentor, Julie Chrisley. I have known Julie for most of my life, as we first met 15 years ago. I am good friend of Julie's son, Chase, and have had the privilege of spending time with Julie and her family. Julie has watched me grow up, and because of her example, has helped shape me into the woman I am proud to be today.

One thing that has always stood out to me is Julie's care for others. She puts her faith and family first, and shows her love by being a listening ear, a helping hand, and the best giver of advice! Julie has always been someone I have felt comfortable to go to in times of need. Julie has the softest soul, and gentlest heart. Her calming voice and soft demeanor could get me through just about any sad or stressful time in my life.

Julie is a second mother to me, and has taught me so much during each and every moment we spend together. She has taught me, for example, what it means to be a great mother and wife. Watching Julie makes me excited to have a family of my own someday. The love she shares for each of her children is admirable and an absolute joy to experience.

Julie is a symbol of strength, compassion, and generosity. She is the first person to send a meal to someone in need! Cooking is one of Julie's greatest passions, which she uses to spread love, laughter and most importantly, family time in her kitchen. Julie's carrot cake is the best in the world — but every time I try to make it, it does not seem to turn out quite like hers! She just has that magic touch.

Julie is the center and rock of her family. Leaning on her faith in God, Julie is the glue that holds everyone together. She truly lives her life for the Lord and is an absolute angel on earth. Julie leads with grace and is always a pleasure to be around. Her humility, through her rise to fame has been inspiring, and is an example I strive to emulate as I begin my career. I am aware of the charges Julie faces and cannot even begin to fathom that she would be capable of knowingly committing any of them.

Julie has spent over 25 years being a devoted "hands on" mother to five kids and still has two at home. I know she feels immense responsibility to be there for both Grayson and Chloe, as well as the rest of her family. I can only begin to imagine the way she is feeling. I know the thought of losing even a moment with her family is crushing her spirit. And it is equally painful to think of the family spending a moment without her.

I could go on and on about my dear friend, Julie, who I consider family. She has a smile that lights up every room, a contagious laugh, and I am certain a heart filled with faith, love, and compassion.

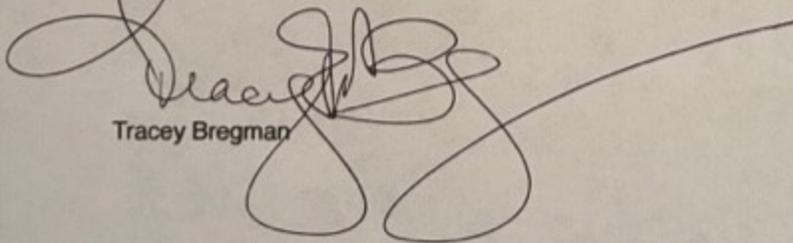
Sincerely,  
Madison Brainard

A handwritten signature in black ink, appearing to read 'MSB'. The letters are stylized and connected, with a large 'M' on the left, a smaller 'S' in the middle, and a large 'B' on the right.

Honorable Eleanor L. Ross, Judge  
United States District Court

Your Honor,

I realize I'm sending you the same letter for Todd and Julie Chrisley, as my feelings for both are the same. I met Julie Chrisley in May of 2018, when I was a guest on her show. We became instant friends and stayed close. When my house burned down November 2018 in the Malibu, California Woolsey fire, Julie was a constant source of love and support and welcomed my family into her home for Thanksgiving, something that still brings tears to my eyes, I will never forget it. We have stayed close during these last few years and have shared many times together. Julie has always been a strong support for me and for my children. Always there with wonderful advice or shoulder to cry on. I know, for any of her friends, she would do anything to help, if we needed it. She is a strong, wonderful woman with amazing family values and a strong marriage. I have always looked up to her and Todd. I couldn't be more shocked by all of this, this goes against everything that I know of Julie and her family.

A handwritten signature in black ink, appearing to read "Tracey Bregman". The signature is highly stylized and cursive, with large loops and a long horizontal line extending to the right.

Tracey Bregman

Vera W Carter  
539 Ashler Drive  
Greer, South Carolina 29650  
bebecarter1963@gmail.com

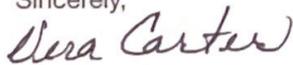
October 18, 2022

To The Honorable Judge Eleanor L. Ross,

It is an honor to write this letter of reference for Mrs. Julie Chrisley. She has been a good friend for over 5 years. We met through a mutual friend from her hometown of Seneca, South Carolina. Our relationship has developed into a strong, trusting, place you are safe, share your vulnerabilities, and know you are loved friendship. The stress that this past year has brought to Julie and her family is immeasurable. Many would have folded under such pressure. I have watched Julie get up off her knees, stand and become assured in knowing that God is her stronghold during this time of distress. She is a woman of perseverance. A woman who battles for what is right and who believes in truth prevailing. She is selfless and is constantly caring for others. An example of this was when my sister-in-law, whom Julie has never met, was diagnosed with breast cancer. Julie, a breast cancer survivor, called her, encouraged her, sent her a surgery care package and followed up with her post-surgery. Even though her days are hectic, she still finds the time to reach out to others. She is an exemplary wife, mother, daughter, daughter-in-law, and friend. I have listened to her podcast and what always shines through is her caring nature, her empathy, and her heart for others. I have known this personally, but it also shines through when she is speaking in a public forum. I have met her parents and she comes from a strong, supportive, faith-filled family. She now shares her strength, support and faith with others who are struggling with their own trials and tribulations. She is a wonderful person to have in your life.

It is my sincere hope that the court takes this letter into consideration. Despite this current case, I know Julie Chrisley to be trustworthy, responsible, caring, and a positive example to all who know her personally and to those who know her through the media exposure she receives.

Sincerely,



Vera Carter

Cynthia Annette Cooksey  
4624 Whitestone Way  
Suwanee, GA 30024

October 19, 2022

RE: Julie Chrisley Fraud Case

To The Honorable Eleanor L. Ross, Judge United States District Court,

I am writing to provide a character reference on behalf of Julie Chrisley. Mrs. Chrisley and I have been friends for over 14 years. Our children met and became friends as students at Greater Atlanta Christian School, and Julie and I became instant friends upon meeting each other. Soon after meeting the Chrisley's they moved into our neighborhood in Suwanee, and we enjoyed many years of making great memories as close neighbors and family friends. We have remained close, even after their move to Nashville.

I have always known Julie to be a hardworking, trustworthy, Christian woman of strong moral character, an excellent mother and a loving, dedicated wife. I have watched in awe as she gracefully navigates life with her blended family and through the adoption of her stepson's bi-racial daughter. Having known Julie to be such an honorable woman, the fraud case against her came as quite a shock.

Julie has always been the faithful friend who would stick by my side no matter what. In 2010, my husband was deemed 100% disabled due to dementia caused by possible CTE. Many of our so-called friends abandoned us during a time of great distress and turmoil. My husband could no longer work, and we had three young sons to support. Julie and her family were the friends who remained close and offered to help in any way they could, never turning their backs on our suffering like others did. During that time, Julie shared with me about a trusted colleague who was discovered to be swindling money from their company, and I believe this is the basis of the entire case against her. Although they were suffering from the fallout of this deceit, Julie remained unwavering in her care for us.

In 2015, my husband was in a near-fatal accident, and stayed in ICU for two weeks. Without any prompting from me, Julie was the one friend who was continually keeping check on us, helping with meals and making sure our sons were taken care of so that I could focus on my husband's care in the hospital. There are countless other ways in which Julie has shown her kindness and compassion to me and our family over the years, and I know she has displayed this same kind of care for many others in her broad sphere of influence. The fame from her family's TV show has not changed her sweet spirit and heart for others.

It is my sincere desire that the court takes this letter into consideration at this time of sentencing. Despite the case against her, I believe that Julie is an honorable woman who lives up to high principles and is a valuable member of our community.

Sincerely,

  
Cynthia A. Cooksey

Tyler Cooksey  
221 16<sup>th</sup> Street NW, Apt-9  
Atlanta, GA 30363

November 5, 2022

RE: Julie Chrisley Fraud Case

To The Honorable Eleanor L. Ross, Judge United States District Court,

I am writing to provide a character reference on behalf of Mrs. Julie Chrisley. I have known Mrs. Chrisley for 14 years, which is more than half of my life. I met Mrs. Chrisley after her son, Chase, and I became best friends while at Greater Atlanta Christian School. My family and the Chrisley family became very close family friends at that time and have remained very close with them even after they moved to Nashville. Mrs. Chrisley has been amazing to me and my family for all 14 years that we have known the Chrisley family.

In 2010, my father was deemed 100% disabled due to dementia possibly caused by chronic traumatic encephalopathy (CTE). At that point in my life, this was an extremely challenging obstacle for me to comprehend and figure out how to handle. There were very few people that I had to help me through these tough times. Some of our close family friends showed that they cared at the beginning when my father was first deemed mentally disabled, but most didn't stick around long enough to actually help. It wasn't like my father was just sick for a short period of time and would get better eventually – this was something that my family and I would be dealing with forever. The Chrisley family was one of the very few, if not the only family that have truly stuck by me and my family over all of these years. A few years after my father was deemed 100% disabled, my older brother was diagnosed with schizophrenia, which was a crippling moment for my mother as she now had to handle dealing with a mentally disabled husband and mentally disabled son while still doing her best to be a mother for me and my younger brother. Mrs. Chrisley was very supportive to me and my mother during these times. Mrs. Chrisley has always treated me as one of her own sons and has shown me the same love and support as she does her own children. I am forever grateful for her always being there for my mother. My mother did not have many people that she could trust to talk to about everything going on in our family life, so I know that my mother is extremely grateful to have Mrs. Chrisley as one of her very few faithful friends that has stuck by her side through the thick and thin. I have always seen Mrs. Chrisley as a strong Christian woman, trustworthy, excellent mother, and a loving wife. She is one of the sweetest and most loving and caring people that I have ever come across in my life. I am so thankful that God has blessed me with the opportunity to have Mrs. Chrisley be a part of my life.

I am shocked that these charges have been brought against Mrs. Chrisley and it breaks my heart to hear the proposed sentencing for such an amazing woman that has been such a crucial person in my life. She has treated me as her own son and is a loving mother to her children and dedicated wife. Mrs. Chrisley is not a threat to society and does not deserve to go to jail. It is my sincere desire that the court takes this letter into consideration at this time of sentencing. Despite the case against her, I believe that Mrs. Chrisley is an honorable woman who lives up to high principles and is a valuable member of our community.

Sincerely,

  
Tyler Cooksey

October 13, 2022

Honorable Eleanor L. Ross  
Judge, United States District Court  
1788 Richard B. Russell Federal Building and United States Courthouse  
75 Ted Turner Drive, SW  
Atlanta, Georgia 30303-3309

RE: Letter of support for Julie Chrisley

Dear Honorable Ross,

My name is Allison Alderson DeMarcus, I am originally from Jackson, Tennessee, and I have lived in Nashville since moving to the Music City in 2002. I have been married to my husband, Jay DeMarcus, since May 2004, and have two children, Madeline age 11, a sixth grader at Harpeth Hall School, and Dylan age 10, a fourth grader at Oak Hill School. I worked as a correspondent for Country Music Television for over ten years before deciding to focus more on my children and family.

The work I have enjoyed the most in my life outside of providing for my family has been serving the Nashville community. I have been on the Board of Directors of the Make-A-Wish Foundation of Middle Tennessee for four years and helped my husband as Co-Chair of Waiting for Wishes, an event which spanned 20 years and provided over \$3.5M for children. I have served on the Community Foundation of Middle Tennessee's Women's Fund for three years, helping facilitate their annual event, Power of the Purse during my tenure, volunteered for the Nashville Symphony League, Nashville Ballet, Friends of Warner Parks, Nashville Alliance, and The Frist Center. I have served as Chairman of *Divas Nashville* for The Oasis Center, chaired *The Mad Hatter's Ball* for the Sexual Assault Center, Co-Chair of *Cause for Paws* for the Nashville Humane Association, Co-Chaired *The Harvest Moon Ball* for Second Harvest Food Bank, and Co-Chaired *Sunset Safari* for the Nashville Zoo.

I have served on the Board of Directors for the Miss Tennessee Scholarship Pageant, Sigma Epsilon Chi Omega Advisory Board at Vanderbilt, Cheekwood Botanical Gardens, The Memorial Foundation working on the Grants Committee, Vanderbilt Ingram Cancer Center Board of Overseers and Monroe Carell Jr. Children's Hospital at Vanderbilt. Two years ago, I chaired an \$18M Pediatric Cancer Campaign to expand the reach of Vanderbilt's research as well as patient care and will begin serving as Cabinet Chair for the Pediatric Rehabilitation Campaign this month. Last year, I founded a new national organization called Miss Volunteer America. The Miss Volunteer America Organization is a nationwide, service-oriented scholarship program based in Tennessee that seeks to empower young women across the country through educational scholarships and extraordinary opportunities. In its inaugural year, we provided over \$700,000 in educational scholarships for young women and have already awarded over \$220,000 in educational scholarships in the beginning of our second year. As volunteers, I believe it is our mission to educate and inspire our next generation of volunteers.

I have known Julie Chrisley on a personal level since October 12, 2015. I was serving as emcee of the Miss Tennessee Teen USA pageant and Julie's youngest daughter, Savannah, won the pageant in Clarksville, Tennessee. During the official photographs taken on stage after Savannah's crowning, I met and spoke with Julie and her son, Chase, as well as Savannah.

I have known Savannah's pageant director and the team preparing Savannah for Miss Teen USA extremely well for the past three decades, with many of those team members attending numerous birthday parties, celebrations, and my wedding. Throughout the preparation process for the national pageant, I was involved with Savannah's training and was also invited to the Miss Tennessee Teen Send Off Party with close friends and family. I was in awe of the level of gratitude Julie had for the people helping her daughter and the graciousness she shared through her kind words, gestures, and thoughtful tokens of appreciation. We were all so touched because Julie's display of gratitude was extremely personal and never ostentatious.

Julie and I not only enjoyed sharing the journey of her daughter's pageant experience, but also quickly bonded as mothers, daughters, wives, and also because Julie is a breast cancer survivor. In January 2016, my mother was diagnosed with Stage 3 breast cancer and Julie was there for me. She immediately provided an outpouring of support sending cards, flowers, advice, medical contacts, and dinner on a weekly basis to help as I was struggling with caring for my parents and young children all at the same time. No matter how busy her schedule was and how much she needed to do in order to care for her own family, Julie somehow found the time and energy to offer assistance with my children and to help me feed my family. She acted as if it was a small gesture, but the relief it provided me during some of my hardest days was the greatest blessing anyone could have extended to me.

Julie's support of and participation in Susan G. Komen fundraisers, walks and activities spurred my interest and support of the organization as well. I enjoyed training for and creating a team with Julie for the Susan G. Komen Walk in Nashville. I wanted to stay home the morning of the walk since it was raining outside, but I knew that nothing would stop Julie from participating. She had made a commitment and she was going to stand behind it. So there we were, walking the streets of downtown Nashville early on a Saturday morning in the downpouring rain and Julie never took a smile off of her face.

In May 2016, my grandmother passed away and in October of the same year, I lost my father. His sudden death occurred around the Thanksgiving holiday and again, even though it was the busiest time of the year, Julie and her husband, Todd, came all the way to Jackson, Tennessee, to support me during my father's funeral. Julie helped with my children, sent floral arrangements and food to feed the masses so I could spend time getting my arms wrapped around the magnitude of my mother's healthcare and her financial situation. I could not have made it without Julie's support and assistance.

Julie not only helped me, but when another mutual friend's mother passed away just a month later, Julie was also there for her. Dropping everything on her schedule to drive to the outskirts of town with water and food to help those working on the funeral

services was something Julie was determined to do. This was not a one-time occurrence; it speaks to the thoughtful and generous friend that Julie is and has been to everyone in her life. Anyone can make a phone call and send flowers, but Julie would take the time to go to the grocery store personally so she could be the one to cook for someone else's family, help other families and also personally deliver the food she made to those in need. While there have always been plenty of people around Julie who could have done any or all of these things on her behalf, it was always Julie who did the work and made the effort personally.

At Christmastime, I have witnessed Julie purchasing numerous gifts and toys for those less fortunate year after year. It is difficult to describe the enormity of Julie's giving and the lengths to which she went in order to help as many children as possible. While she has a very large family herself, has always worked full time and cares for so many family members and friends, Julie always carves out time to personify the true meaning of Christmas for her children. She has given far above and beyond any donation that would ever be expected...she ensures that she gives as much as she can possibly give. Never for credit or recognition, but to put a smile on the faces of children at Christmas.

For the past twelve years, I have been on the Board of Directors of the Monroe Carell Jr. Children's Hospital at Vanderbilt, having served as President for four of those twelve years. Whenever Julie has been given a lavish number of gifts by a company or entity, instead of using those things for herself or simply tossing them away, Julie has called me numerous times over the years and asked if she could please send items to the children at the Children's Hospital. Whether it was hair ties for girls, sports equipment or Legos, Julie loves sharing as much as she can with anyone in need. She has never allowed the hospital to thank her publicly for any type of donation she has made, she has only wanted to know that the items she gave would go directly to patients.

Throughout my relationship with Julie, I have constantly been in awe of the manner in which she so unhesitatingly has assumed the role of being Chloe's mother. While Chloe is her grandchild from her stepson, I know countless women who are not selfless enough to take on the role of parenting a grandchild, especially one who is not their biological grandchild. Julie eagerly and lovingly stepped into the role of mother and caretaker for Chloe without one question or thought, only the best interest of the child. I have been in her home on many occasions and watched the tender way in which Julie teaches Chloe respect, kindness and how to be a good friend to her peers. Julie sees that Chloe is receiving the best education possible, helps tutor her if she is ever struggling in any area of her studies and keeps Chloe surrounded by love at all times in her life so that she never feels different or less than any of Julie's biological children.

Not only is Julie nurturing toward Chloe, but she is teaching Chloe compassion for others. Through her work with Tennessee Alliance for Kids, Julie has taken Chloe many times to help prepare backpacks for foster children who need the basics from toothpaste to blankets as they are placed in homes with their new family. Having Chloe participate in these types of activities not only puts her own young life in perspective, but also teaches Chloe how to live her entire life with a servant's heart. Julie's involvement with

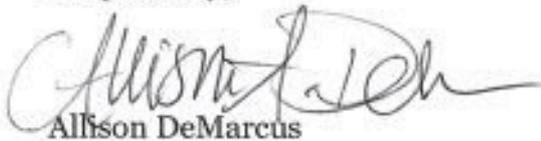
Tennessee Alliance for Kids has been an inspiration to me and so many women who watch her from a distance that Julie doesn't even personally know.

I share many personal and professional friends with Julie, and I have always witnessed her exhibiting unparalleled integrity and the utmost ethical behavior. Julie is hard-working, trustworthy, and levelheaded. She treats everyone she encounters with respect and is consistently calm, even when faced with escalating emotions and/or adversity.

Not only is Julie greatly respected in our community as an advocate for breast cancer survivors, but she is highly regarded throughout the entertainment world. Julie is a woman of solid character and revered as someone whose integrity and fairness is without question. Julie is the epitome of a sound moral compass with whom I would trust any situation implicitly.

Should you have any specific questions regarding this letter or need additional information about my relationship or experiences with Julie, I am more than happy to assist you at any time. Please do not hesitate to reach out to me (615)557-8932 or [allison.demarcus@yahoo.com](mailto:allison.demarcus@yahoo.com).

Respectfully,



Allison DeMarcus

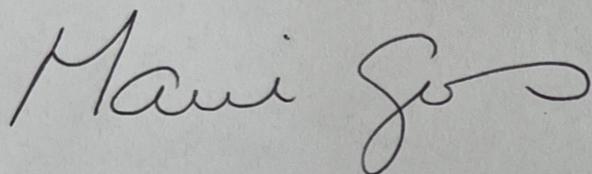
## Julie

Writing this letter will be extremely difficult and very emotional for me. I will not waste your time trying to sell you my best friend Julie Chrisley. Seventeen years ago, I met the most beautiful spirit to roam God's earth. That infectious giggle made me laugh so hard on our first walk at New Town Park. Julie was just as southern and sweet as they come. She wore a pair of beautiful earrings and dressed in her athletic gear. Then there's Me, a Lil Tom boy of a mom in an oversized old shirt, no makeup, and no jewelry. Where I come from we didn't walk around the park made up. Not to mention with our jewelry on. I ask her why you are wearing that at the park. She smiled just as big with that giggle. Girl, God got me! I'm not worried about that material stuff. That was the Moment I knew she would be a genuine friend. Julie and I spoke every single day from that day on. She and I called one another during our drive to school and after. We were as opposite as any friends could be. I'm a single mom raising three children. She was married with four children. I'm a black woman raised in midwest Indiana. What are the odds of us two becoming inseparable? Shortly after our friendship began. Julies family became my family, and mine became hers.

This tiny little woman has a heart of gold, she will sacrifice herself for those she loves. I could share my soul with Julie and never worry if my loyalty would be compromised. I could tell her about anything going on in my life or my children. Not once did she judge nor condemned me. I learned quickly not to go to Julie Christley seeking advice unless I wanted the truth. She would say it to you very lovingly; however, that made no never mind. Julie is a one-of-a-kind woman, mother, and friend. The type of woman any young lady would strive to be. I can't remember one time in our seventeen years of friendship. Never having to question her loyalty or trust. She has been there for me through the most challenging times of my life. I was there when Lindsey asked Julie to adopt her. What an honor that was for Julie. Julie was filled with happiness and so much joy. When Chloe was born Julie stepped into a mother role for her and never turned back. She was and still is Momma Julie, and it was love at first sight. Not one time did she question her role in Chloe's life. Julie treated Chloe just as she did the rest of her children. One of the most important things she and I had in common. We both wanted to be the best most loving Mothers we could be. We spoke about our children endlessly and still do. We share our values on what we feel a proper up bring is. Julie and I take enormous pride in instilling morals and values in our children. We still talk about raising adult children and want to protect them from some things of this World. I still remember Julie calling me with her breast cancer diagnosis. I knew he would never say she needed me. Therefore I just showed up at the hospital on the day of her biopsy. She was delighted and beyond shocked. Julie Chrisley does so much for everyone and never asks for anything in return. I wanted Julie to know she didn't always have to give she could receive. Watching her transition into tv

Julie was quite entertaining. Julie has never changed one bit. She and I still call and text about cooking new recipes for our families. Julie is not driven by the lifestyle or television show. Please don't misunderstand me she is more than grateful for the show. The show does not define the real true character of Julie. She has taken care of her children as well as her family before herself. Julie is happy in a pair of jeans and flip-flops, organizing her pantry. Julie is a woman who still mops her floors. I tell her all the time, what's not to love about Julie Christley? We have been the best of friends for years. Our friendship will remain solid and untouchable throughout our lifetimes. She and I will hold one another up no matter what storm comes our way. Her kindness, loyalty, and pure essence of a good human have set her apart from this world. It's genuinely one of my greatest pleasures knowing Julie. I thank God for having her as an inspiration to my family and me. Thanks so much for your time.

Mauri Goens

A handwritten signature in cursive script that reads "Mauri Goens". The signature is written in dark ink on a light-colored background.

**From:** Stephanie Grooms <sgrooms2@me.com>  
**Sent:** Monday, November 7, 2022 10:08 AM  
**To:** Anulewicz, Chris  
**Subject:** Julie Chrisley

[External Email] Please use caution.

Stephanie Grooms  
614 Dr. Mitchell Rd.  
Seneca, SC 29678  
8643642188

To: Honorable Eleanor L. Ross,  
Judge  
United States District Court

Dear Honorable Judge Ross,

My name is Stephanie Grooms and I am writing in regards to my longtime friend, Julie Chrisley. Julie and I have known each other for over twenty five years. I would like to tell you some things about Julie that make her exactly who she is, kind hearted, and as genuine as they come.

Julie and I first met when she and Todd started dating, and I liked her just as much as Todd did. Julie is the friend that everyone hopes to have. Julie is the one who is always willing to help in any way possible and to listen when you need it most.

Julie and Todd married, and Julie helped to raise Todd's oldest daughter and son as step Mama and then after some time, just Mama. Julie loves them as her own, and has never given it a second thought. Later Julie birthed her three children with Todd, and has raised five children all together. Julie has done that with such grace and love, and now she is raising one of she and Todd's grandchildren, Chloe, who they have custody of.

Julie has always called me and made sure to keep up with my children and now my grandchildren as well. Julie also sends me clothes every year that she and Todd's grand daughter, Chloe has outgrown. Julie never forgets birthdays and always lets you know she loves you.

One of my favorite things about Julie is the love she has for her entire family and her friends. Julie always wants everyone around her to feel loved and appreciated. Julie is one of the best southern cooks I know, and shares the best recipes anytime you need one. Julie is more than hardworking and never sits down for long, because she is always taking care of someone.

Julie has had her own battles to overcome, and fought and pushed through with such strength, courage, and grace, and without many ever knowing until she chose to share it. Another of many reasons I admire her. Julie is also a God fearing woman, and that makes her even stronger.

Julie is the glue that holds her family together, whether helping her children, grandchildren, her parents, her mother in law, her friends, or even a stranger on the streets; you could not ask for a better person. To really know Julie and her genuine soul, is to love her that much more. I tell you these things so that you may have a better idea of who you are sentencing.

I would like to thank you kindly for taking time to read this letter.

Sincerely,  
Stephanie Grooms

Aphemia Group

Sent from my iPhone



Daniel A. Hatef, M.D.  
Board Certified - American Board of Plastic Surgery  
Member - American Society of Plastic Surgeons  
Member - American Society for Aesthetic Plastic Surgery  
Clinical Associate Professor of Plastic Surgery - Vanderbilt University Medical Center  
6200 Highway 100, Suite 101  
Nashville, TN 37205  
615.815.7122  
drhatef@danhatefmd.com

11.4.2022

Honorable Eleanor L. Ross, Judge  
United States District Court:

My name is Dan Hatef. I am a plastic surgeon in Nashville. I did college and medical school in Baltimore, and then the bulk of my training in Dallas and Houston. I have been in practice for 7 and 1/2 years here in Nashville, where we moved when I was done with my training in Texas.

This letter is a letter of character for Julie Chrisley. I have known Julie as a patient and an acquaintance for about 3-4 years. I appeared on their television show twice. We initially met through her daughter Savannah, who is a friend and patient.

I cannot speak to the charges that they are facing because I have purposefully avoided reading anything about it for ethical reasons. I do not want to know anything about gossip and news going on about my patients.

I do know that Julie is a very dedicated, very good mother who spends an inordinate amount of time and energy trying to ensure that her son Grayson (16) and granddaughter/adopted daughter Chloe (9) have the most normal life possible. Despite being in the spotlight from a very young age, Savannah is an incredibly grounded young Christian woman who doesn't just talk the talk when it comes to morals, she walks the walk. She always gives credit for her character to her mother and the way that she raised her.

Thank you for having taken the time to read this letter. Please do not hesitate to call or email me if you have any questions.

Sincerely,



Dan Hatef

Tuesday, November 8, 2022

Honorable Eleanor L. Ross  
Judge, United States District Court

My name is Jasmine Hollis and I am writing a letter of character for Mrs. Julie Chrisley. I have known Julie for roughly five years. Our relationship initiated through working on the Chrisley's television series for multiple seasons. Although it began as a working relationship, the bond evolved into much more due to Julie's warm and inviting nature.

Julie is an amazing mother and grandmother who loves her family dearly. She is without a doubt the glue that keeps her family closely bound. Julie is a nurturer with a pure heart and passion for raising a happy and healthy family. I have personally experienced the nurturer in Julie that extends far beyond her own children. She would constantly make kind, genuine gestures for the crew like baking desserts or giving thoughtful Christmas gifts to every single person on set. Julie Chrisley is resilient and deserves a long, healthy life surrounded by her children and loved ones.

Although our personal and professional lives overlap, I'll add that as a friend, I have witnessed Julie as honest, trustworthy, and loyal to her loved ones. Thank you for taking the time to read this letter and hope all is taken into consideration.

Best Regards,

Jasmine S. Hollis

A handwritten signature in black ink, appearing to read "Jasmine S. Hollis". The signature is fluid and cursive, with the first name being the most prominent.

Marcia T. Hydrick  
114 Sunnyview Drive  
Seneca, South Carolina 29672

November 4, 2022

RE: Julie Chrisley

To: The Honorable Judge Eleanor L. Ross  
United States District Court

Dear Judge Ross,

My name is Marcia Hydrick. I am a licensed General Contractor in the state of South Carolina. I am President of our family business, working for over 45 years outside the home and raising my family as well. Working in our family business has been an education on top of my college education. I guess you could say it's been my "real" education with many areas of responsibilities that only hands on hard work can teach. Julie and I relate to this scenario with many other women who share our career endeavors.

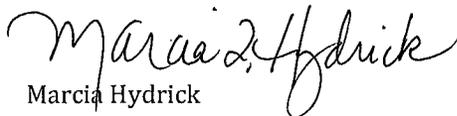
I am writing this letter regarding my friend Julie Chrisley. I have known Julie and Todd, her husband, for most of my lifetime. We grew up in the same small hometown, Westminster, S.C. As Todd and Julie relocated over the years our friendship has remained close at heart. Julie possesses integrity, moral character, and dedication to her family and her career. As long as I have known Julie she has always been faithful to her beliefs and lived them in her daily walk. Her parents are also hard working individuals who taught her family love, faith, and generosity.

I respect the professional woman that she is and management of her household with a career at the same time. The life she has helped create has been through hard work and dedication, loving her family and friends every step of the way. Her trustworthiness speaks volumes through their work and running a business in their field of entertainment. I respect how she has juggled all of this and continues to raise her family with 100% love and dedication.

As I have stated in Todd's letter.... The success and future of this family depends on the continued leadership of Julie and Todd for their livelihood and the success they have worked so hard for all of their lives. The employees who have jobs and provide for their families in the industry depend on the success of this industry of good, down-to-earth entertainment that millions of people who watch them can relate to their family antics and daily ups and downs of raising a family. It is heart warming and real. In closing, Julie Chrisley is a supermom and a God given blessing to so many, especially to those who truly know her.

Judge Ross, I thank you and appreciate your time allowing me to write this letter on Julie's behalf.

Best Regards,

  
Marcia Hydrick

# Brandon Janous

2907 Cardiff Castle Ln  
Knoxville, TN 37931  
573.424.4349  
[brandonjanous@yahoo.com](mailto:brandonjanous@yahoo.com)

Honorable Eleanor L. Ross  
Judge United States District Court

Honorable Eleanor L. Ross,

I have had the privilege to call Julie Chrisley a friend for about six years now. We were connected through some not so great circumstances and the fact that she and my late wife were both diagnosed with Breast Cancer.

Julie had come across our story in one way or another and we became quick friends. Her constant support and love was so special to us as we battled cancer. Julie would check on us often and though she had a million other things on her plate, she was always there with a listening ear and a big hug. She did (and continues to do) everything in her power to share our story with others and to make sure that people understand that breast cancer doesn't discriminate and can come for anyone at any age.

When I think of all the different people that were in our corner during that season of our lives, Julie's relationship with us stands out. Simply because she chose to love us so well, exactly where we were, looking for nothing in return. And she has continued to do that for our family today as well. She didn't have to love us like she did. But that's what Julie does. She loves people well.

If you have any questions, please don't hesitate to contact me.

Best Regards,

A handwritten signature in black ink, appearing to be 'BJ', with a long horizontal flourish extending to the right.

Angel Johnson  
5330 Burrus Lane  
Mableton, GA 30126

October 19, 2022

Honorable Eleanor L. Ross, Judge  
United States Court District

Dear Judge Ross,

Thank you for taking the time to read my letter. I'm writing on behalf of Julie Chrisley whom I've known for close to 10 years.

Julie & I developed a close bond while working together in television production. It's not always easy to allow people to become a part of an already tight knit family but Julie did it with ease. She is a wonderful mother, grandmother and puts her family first at all times. From after school activities to cooking to making sure her mother in law always has what she needs, Julie handles it all with great dedication.

Julie and I share a love for giving. Even when she isn't feeling her best and going through her own personal struggles, she displays a "cheerful giver" attitude and encourages other to do the same. When anyone needed anything or was going through a challenging time, Julie was compassionate and would immediately jump in wherever needed. If "Let me know if you need anything" was a person, it would be her. Friends become family over time and Julie & I have lived up to that saying. I am grateful to know her.

The current situation Julie is facing is difficult. But she is faithful and I believe she can trust God's plan whatever the circumstance.

Thank you,



Angel Johnson

C. Lea Johnston  
480 Andelle Ave  
Suwanee, Ga 30024

October 13, 2022

Re: Julie Chrisley

To: The Honorable Eleanor L. Ross, Judge United States District Court

I am writing on behalf of my best friend, Julie Chrisley. I would like to share a little bit about her story with the hope that you will discover her to be a loving kind-hearted person without a selfish bone in her body.

I have known Julie for over 13 years and we met through a mutual friend when he suggested that I call Julie to see if she had a job opening. We met for lunch and immediately hit it off. She offered for me to come aboard and help list properties at her company. Her offer saved me from filing bankruptcy. She didn't need any extra help, but I think she saw she could help me and she did. Because I was a broker, it provided Julie an opportunity to step back from the business to focus on her children and family more. I worked for her from 2009-2012.

When I met Julie, Savannah and Chase were in middle school and Grayson was in pre-school. Julie was always running the children around, planning birthday parties and volunteering for activities. But, she was also still raising Lindsie and Kyle from Todd's previous marriage. Julie was a steady figure in their lives as well since she raised them from an early age when their biological mother was not a presence. Kyle had major emotional challenges as well as drug abuse issues and when I met Julie they had him in an intense treatment facility and she was always taking calls regarding him and his treatment. It was very wearing on her and the family. Lindsie was downtown in college at Ga State and she was in a rebellious stage and decided to elope with a boy the family had not even met yet. To say this was a stressful time and that Julie was pulled in a million directions is an understatement. Somehow, through it all, she was always so graceful, strong and resilient. In March of 2012 she was dealt another blow, she was diagnosed with breast cancer. She pressed through as though there was no other option but to live, if not for herself, but for those around her. I was always and still am amazed by her.

2012 would continue to prove to be a challenging year for Julie. Julie's father-in-law died in July 2012 after battling cancer and Todd and Julie learned they would become grandparents. This would be a happy occasion for most people, but unfortunately, their son, Kyle, nor his girlfriend, were going to be able to care for this child. Todd and Julie knew that they were going to have to seek custody of their granddaughter, Chloe. Julie would now become the "mother" to a grandchild from a son that wasn't even biologically hers. Julie never complains about her role in Chloe's life. She has taken on her role as "mother" to Chloe gracefully and as though it is her duty to the family. She is the most selfless person I know. I have spent evenings with Julie and Chloe at home and to see her with Chloe you wouldn't ever know she isn't biologically hers.

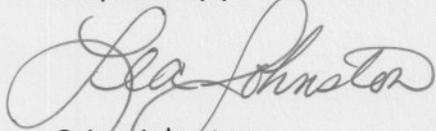
The love they share is deep. I can't imagine the loss Chloe would feel to lose another parent at this developmental stage in her life. Chloe would be greatly scarred by another change in her living arrangement from the loss of Julie. Chloe is biracial and has faced many challenges from ignorant people around her as well as the depth of her abandonment issues for which she continues therapy. If you need just one reason for leniency on Julie, it would be for Chloe.

Julie is also the main caretaker for her mother-in-law who is battling bladder cancer. Julie runs Faye to her doctor's appointments, therapy sessions, treatments and takes care of her post treatment overnight. To take Julie away from Faye at this stage in her treatment would be a death sentence for Faye. It would cause someone else to have to learn Faye's treatment schedule, her routine and would cause emotional stress. Faye is not someone who will allow strangers in her home, nor would she allow them to help in her very private aftercare needs. She would require an in-home nurse if it weren't for Julie..

Over the 3+ years that we worked together, Julie and I became great friends. She was there when my children were born, she always calls to check on me, and she is always someone I can count on to tell it to me straight and offer honest advice about raising my own children or my business. She is a shoulder to cry on and a comforting presence in my life. I've never known her to be unkind to anyone. If you were to know her personally, you would understand why I cherish our friendship so much.

I am trying to come to terms with the verdict and I have prayed that Julie is provided leniency. It is my prayer for Julie to be given the opportunity to shine her light on those around her where she is needed most. I have heard her speaking with strangers on the phone to offer support and advice to someone who was just diagnosed with breast cancer. I have heard her in public meet a stranger and offer uplifting words to them on a bad day. I have had her turn to me in the car while driving to brag on someone she met and share their uplifting story with me. I have seen her shine her light on so many around her. Although there is a TV persona of Julie, her private one is even more real and sincere. Julie's entire life has been centered around her family and serving others. I know her to be a faithful follower of Jesus and I pray that she has the opportunity to stay with her family and continue to make a positive impact on those around her. Julie is a credit to her community, her family and to herself.

Respectfully yours,

A handwritten signature in cursive script that reads "C. Lea Johnston". The signature is written in dark ink and is positioned above the printed name and phone number.

C. Lea Johnston  
404-271-3206

Aisha Jones  
5330 Burrus Lane  
Mableton, Ga 30126

November 8, 2022

Honorable Eleanor L. Ross, Judge  
United States Court District

Dear Judge Ross,

It is also with great pleasure to write this letter on behalf of Julie Chrisley, whom I've also known for almost 10yrs.

Julie is a woman of many talents who loves to cook, bake and enjoy quality time doing school projects with the kids. She's a great mother, grandmother and daughter.

Her passion for giving back and being a light of hope to others is what brings her the most happiness outside of being a mother. I've had many opportunities to witness and help out during some of her community activities.

Julie has overcome many obstacles in her life that she accounts for God's grace and mercy seeing her through. Despite any challenges someone might be facing, Julie will always give an encouraging word.

Thank you

A handwritten signature in black ink, appearing to be 'Aisha Jones', with a stylized, flowing script.

Aisha Jones

November 9, 2022

RE: Julie Chrisley sentencing

Dear Honorable Eleanor L. Ross,

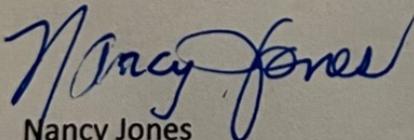
My name is Nancy Jones, I am the wife/widow of country music legend, George Jones. I have known Julie for a little over 9 years. I understand Julie is coming before you soon for sentencing so I have asked if I could write a letter to you to share who Julie really is.

I have personally visited with Julie last week about all this legal trouble and I wanted you to know I stand behind Julie and support her whole heartedly through this whole ordeal. She is a very passionate, kind, loving mother and wife. She is a true role model to so many and I love her dearly. I know she is going through so much right now and what mother would not be worried about her kids and family. Just know that I am her friend and will always be her friend.

I appreciate you taking the time to read my letter and to fully understand who Julie really is as a person, wife, and mother. Her kids are her life and she truly is an amazing woman. I can't even imagine her without her kids and raising them daily and loving on them. All kids need their parents love to grow up and be able to share that love with their kids one day.

Please read this letter and know that I love Julie and their family and will do whatever I need to help them during this time. I don't ever write letters about someone's character so this is rare but needs to be done so you can see who Julie really is as a person. If you have any questions or concerns please feel free to call me.

Kind Regards,

A handwritten signature in blue ink that reads "Nancy Jones". The signature is written in a cursive, flowing style.

Nancy Jones  
615-856-2269

# NIC KERDILES

611 21<sup>st</sup> Ave N Nashville TN 37203 | 714.625.9119 | nickerdiles@gmail.com

**11/2/22**

Honorable Eleanor L. Ross,  
Judge  
United States District Court

## **RE: CHARACTER REFERENCE FOR JULIE CHRISLEY**

Dear Honorable Judge Eleanor L. Ross:

I, Nic Kerdiles am writing this letter on behalf of my friend Julie Chrisley who will be appearing before you requesting leniency in her sentencing.

Julie Chrisley came into my life 5 years ago and I genuinely could not see a life without this woman being a part of it. She has become a friend, a mother figure and the perfect representation of what not only I yearn for in a wife and mother to my kids, but what most men yearn for as well. Julie and I have grown especially close in the last year. Having had the opportunity to be around her and her family for the last 5 years, has allowed me to truly understand who Julie Chrisley is at her core.

Julie is a strong, loving, caring, loyal, courageous and generous individually who always is kind, polite and respectful to everyone around her. She could be having the worst day, but no one around her would ever suspect that anything was wrong with her. She has always put others before herself and is one of the most selfless human beings I have ever come across. She always makes sure that her family and friends have a warm meal at the table, clothes on their back and that they are taken care of in every which way. Julie is always the first to figure out how she can help someone else when she hears that they are sick or are dealing with difficult obstacles in their lives.

Julie Chrisley embodies every single positive character trait that the best mother, the best wife and the best friend would have. If you were to go around to a group of 100 people that have

interacted with Julie Chrisley, I feel very confident that every single one of those people would have nothing but positive things to say about their interaction with Mrs. Chrisley. That is the type of impact that Julie Chrisley has not only made with me, but everyone in her community.

Julie has been there for me in my darkest of moments. Even when I put her family through heartache, sadness, stress and danger, she never once turned a blind eye to me and was one of the first to grab hold of me. She has always looked out for my best interest with no strings attached. This type of unconditional love and genuine care for others is something that I believe has become a rarity in the world that we live in today and it would be a loss for everyone to take that away from our society. Julie Chrisley has offered more to others than she ever has to herself, and that type of selflessness is a true indicator of the incredible heart that she has.

I am hereby respectfully requesting that you offer her a lesser sentence so that she can continue to positively impact me and many other people around the world, something that she has always been doing. I strongly believe that a lesser sentence is most appropriate in this situation.

I respectfully ask the court to please take this letter into consideration at the time of sentencing and I hope that this letter corresponding to Julie and her ongoing case acts as an effective and helpful aspect during the Court's decision about this case.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nic Kerdiles', with a stylized flourish at the end.

**Nic Kerdiles**



# ALLIANCE FOR KIDS

*Meeting the Emergent Need*

November 1, 2022

Honorable Eleanor L. Ross, Judge  
United States District Court

I am writing this letter on behalf of Julie Chrisley. My name is Fran Maynard and I am the Director of Engagement at Tennessee Alliance For Kids (TAK).

I first met Julie and her family at TAK'S Very Merry Christmas Parade on Dec. 5th 2021. The parade is for children in foster care in Davidson County Tennessee. Julie and her family attended and handed out pop-it toys and cookies to the families coming through this parade.

At this time, Julie asked how she could get involved with TAK and that is how our relationship began.

Shortly after the parade, Julie and her husband shared about the work TAK is doing in Middle Tn. on their podcast. In 2021 the Chrisley's also decided to give their personal Christmas bonus from their production company to TAK in 2021 which was \$4,000. In May of 2022, Julie put together and donated five TAK PAKs which are backpacks filled with essential and comfort items for children in foster care. In July of 2022, Julie also donated items needed to fill TAK PAKs. Julie has offered, on many occasions, for us to let her know if we have a need and even offered her son's services if we ever needed someone to help with a move.

Thank you for allowing me to share this information.

*Fran Maynard*

Fran Maynard  
Director of Engagement and Development  
TN Alliance For Kids



# McDougall | Self | Currence & McLeod | LLP

John O. McDougall\*†  
Michael W. Self\*‡  
Peter G. Currence  
Ryan A. McLeod\*‡  
Alyssa H. Richardson  
R. Jason Hall^  
Adam Pickworth

791 Greenlawn Dr. Suite 4, Columbia, SC 29209-2641  
P.O. Box 90860, Columbia, SC 29290-1860  
803.776.3130 phone; 803.776.7748 fax  
21 East Calhoun St., Sumter, SC 29150-4315  
P.O. Box 2197, Sumter, SC 29151-2197  
803.778.5062 phone; 803.778.6908 fax

November 7, 2022

The Honorable Eleanor L. Ross  
Judge, United States District Court  
1788 Richard B. Russell Federal Building and United States Courthouse  
75 Ted Turner Drive, SW  
Atlanta, GA 30303-3309

Re: Todd Chrisley a/k/a Michael Todd Chrisley and Julie Chrisley  
Criminal Action #: 1:19-CR-297-ELR-JSA

Dear Judge Ross:

I am sending this letter to you on behalf of Todd Chrisley and Julie Chrisley who my wife, Jodie, and I met several years ago through their close friend, Sherry Bradshaw. Since we met, Todd and I have developed a close relationship. I have had an opportunity to observe Todd interacting with others, and especially those who recognize him from his TV show "CHRISLEY KNOWS BEST." I have been very impressed as to how he has interacted with total strangers who interrupt his meals, conversations, etc. to meet him and take pictures with him. He and Julie are very gracious individuals.

I have found Todd to be a "down to earth" person, and one who does not put on "airs" when you interact with him. Todd is a very religious individual, has a strong belief in God, and does not drink alcoholic beverages. I have found him to be quite truthful, dependable, and forthright with his thoughts and opinions. Someone that I am glad to call a friend.

Todd is a man of high moral standard and one who is friendly and kind to others, whether the others are friends or complete strangers. For the Court's information, I am attaching my legal biography.

With kind regards.

Sincerely,



JOHN O. MCDUGALL

JOM:amk  
Enclosure

Reply to Columbia | [jom@mscmlaw.com](mailto:jom@mscmlaw.com) | [www.mscmlaw.com](http://www.mscmlaw.com)

## **BIO FOR JOHN O. MCDOUGALL**

John O. McDougall graduated from Wofford College in 1967, and graduated from the University Of South Carolina School Of Law in 1971 with a juris doctor degree. He has served as Chairman of the Family Law Section of the South Carolina Trial Lawyers Association (South Carolina Association of Justice/SCAJ), and the South Carolina Bar; Board of Governors of the SCTLA (SCAJ) ('84-'96), (President '93-'94), Board of Governors of the South Carolina Bar ('87-'90, '93-'95; Secretary '95-'96, Treasurer '96-'97, President elect '97-'98, President '98-'99), House of Delegates of the South Carolina Bar ('90-'92), President Senior Law Division ('16-'17), Board of the South Carolina Bar Foundation ('04-'06), President of the South Carolina Bar Foundation ('07-'08), Board of Commissioners on Grievances and Discipline of the South Carolina Supreme Court (1984-1997), and has lectured at numerous Continuing Legal Education seminars concerning Family Law. He was admitted to the Bar of the United States Supreme Court in March, 2004. He is a Fellow of the American Academy of Matrimonial Lawyers, former President of the South Carolina Chapter ('91-'93, '93-'94), was a member of the Board of Governors for the American Academy of Matrimonial Lawyers ('98-'01), he served on the American Academy of Matrimonial Lawyers Foundation Board, and was President ('09 & '11). He is also a Fellow of the International Academy of Matrimonial Lawyers, formally a Vice President of the USA Chapter, a Diplomate of the American College of Family Law Trial Lawyers, and has been named in the Best Lawyers of America (Woodward White), Family Law Designation.

October 18, 2022

Jill Palilla  
1732 Shane Drive  
Spring Hill, TN 37174

Honorable Eleanor L. Ross, Judge  
United States District Court

Dear Judge Ross,

My name is Jill Palilla, and I am writing this letter to you on behalf of my employer, Julie Chrisley. I have known Julie for over six years, having started my employment with the Chrisley family as a housekeeper in 2016.

Over the course of these past years, I have worked for, and with, Julie and the Chrisley family for approximately 50 to 60 hours each week. My job responsibilities were fluid to the extent that I have not only been their housekeeper, but I've also served as a nanny to their younger children, and personal assistant/house manager for the entire family, including Todd and Julie's parents. When you share space and time with someone to that extent, it's impossible to not see, hear, and oftentimes be a part of some of the most intimate parts of their lives. Having had this time with Julie, I'd like to share some personal experiences I've had with her, as well as situations I've witnessed over the years that I feel are very significant that I'd like to mention.

Not too long after I first started my employment, I had a very unexpected health scare that resulted in a trip to the emergency room and subsequent hospital stay. I am a single parent, and with the exception of my two sons, who were 18 and 11 years old at the time, I have no family in Tennessee; my older adult children and extended family reside in Pennsylvania. Before I even made it to my hospital room that day, Julie had arrived at the hospital. When she heard the news that I wasn't well, she dropped everything and came to be there for me. She also constantly checked in with my boys to be sure they had everything they needed. I still remember my daughter telling me how much it meant to her that Julie was so kind and compassionate to do that. That act of kindness did not go unnoticed by myself or my family, and to this day they remember how thankful they were that she was there for me in their absence.

Another notable thing I've experienced with Julie is her heart for helping those less fortunate and in need. As I mentioned, I'm a single parent, and there have been times that financial difficulties arose or money would be tight during the holidays. During some of these trying times, Julie took me shopping and bought coats, shoes, and clothing for my sons, gave me cash to buy gifts for them at Christmas, and was incredibly generous with gift cards for the supermarket so I could be sure to have everything we needed for holiday dinners. These acts of kindness weren't done with any fanfare, there was no post on social media for the world to see, there was no expectation that I would need to repay her for anything. It was just one mother seeing another mother's struggle, and doing what she could to help, out of the kindness of her heart.

I've also witnessed Julie over the years tirelessly caring for her family, day in and day out. She is a very "hands-on" wife, mother, daughter, and daughter-in law. She is involved in every aspect of her family's lives; scheduling and attending doctor and dental appointments, schooling and homework support, scheduling and attending sports and extracurricular activities, and making a home cooked meal every single night even at the end of some very long and tiring days. Julie's daughter Chloe has struggled with behavioral issues, depression, ADHD and severe separation anxiety; these issues have added a lot of weight to an already heavy load that Julie carries each day. She has never wavered, but instead taken on the challenge of these obstacles in order to help Chloe feel safe and secure. Julie is Chloe's safe place and is the one Chloe turns to for reassurance, and stability every day. Sadly, the events of the past several months have made Chloe's depression and anxiety escalate as she worries and wonders about what is going to happen. Her fear of losing Julie causes her emotional upheaval, I can attest to the fact that throughout most of the summer, Chloe wouldn't leave Julie's side, even for a short period of time.

For Julie's aging parents, she is the person that they look to for direction and support. Just as she does for her children, she concerns herself with her parents' health and well-being, watching over them, scheduling and attending doctor's visits and making sure they have what they need at their home. She cares for Todd's mother, Faye, in the same way; immediately stepping in and being the person who was by Faye's side throughout every surgery, doctor appointment and chemotherapy session over this past year.

Of course I'm aware of the wrongdoings that Julie has been convicted of, but despite those things, I know the heart and character of the woman I see putting the needs of others before her own, every single day. She is a kind and selfless woman.

As the sole provider to my sons, financial stability and job security is of the utmost importance to me. Without my job I can't pay the rent, put food on the table or handle the hefty expenses of raising children and putting them through college. It goes without saying that these past several months, since the verdict was announced, have been especially unsettling, stressful and filled with uncertainty about the future. To put it bluntly, Todd and Julie's future directly affects MY future. I suppose many people feel I'd be wise to be looking for another job to ensure continued financial stability; in fact, I've been approached with job opportunities from those hoping I might accept a position with them. I haven't entertained those offers, however, nor have I searched for other jobs or updated my resume in anticipation of moving on. I have chosen to stay. After everything that I have come to learn and know about Julie, I choose to stay to show my respect, loyalty, and support that I feel she deserves.

If it's true that actions speak louder than words, then I hope you consider my act of choosing to stay as my testament to the goodness that Julie possesses.

Thank you for your time and consideration.

A handwritten signature in blue ink that reads "Jill Palilla". The signature is written in a cursive style with a horizontal line above the "i" in "Palilla".

Jill Palilla

10/15/22

Isabel Pasqualone  
35 Briar Ridge Drive  
Bethel, CT 06801

U. S. District Court  
Honorable Eleanor L. Ross

Dear Judge Ross,

My name is Isabel Pasqualone and I am writing you on behalf of Julie Chrisley; my friend and neighbor.

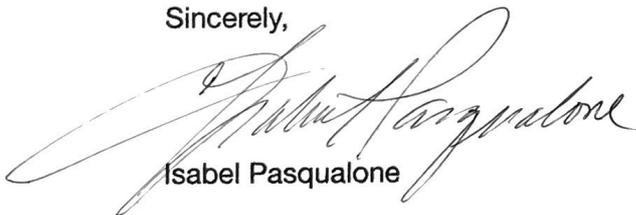
I have had the privilege and honor to have known Julie Chrisley and her beautiful family since 1998. We met through her husband Todd Chrisley in the interior design industry in 1998. Julie and her family became my next door neighbors in 2001 and we established and nurtured a long lasting friendship, which is still very vital today. I became a real estate agent in GA under her leadership and brokerage for 2 years until I moved to CT in 2011.

I have witnessed her raise 2 step children from Todd's first marriage as her own, who visited frequently; along with 3 children of their own and a grand-daughter she is presently raising as her own. I have also witnessed their close relationship and the struggles in raising a child who has endured trauma and experiences, anxiety and depression with the utmost love and care.

Our families have grown together, whether near or far, throughout the different facets of life; shared holidays, overnight stays and have sat at each other's table on many occasions. Julie is whom I have known as the "salt of the earth" as a friend, wife, mother and grandmother. She is honest, genuine, hard working, unselfish, faithful to her family and friends and a God fearing woman, always putting herself last.

I respectfully ask that you grant her leniency, as he is the families's care taker, in all aspects as well as taking care of her parents and mother in law who is currently battling cancer.

Sincerely,



Isabel Pasqualone

10-27-2022

To: The Honorable Eleanor L. Ross,

I'm writing to you in hope that you will consider what a beautiful soul, loving mother, and dear friend, Julie Chrisley, is.

I've known Julie for 12 years. Our sons are the same ages and we have been neighbors. She works tirelessly to serve her family and friends. She is always cooking or cleaning and making sure everyone else is ok. She has never wavered in consistently reaching out to me to encourage me and to check on my kids. She is a rare friend. One I have treasured for years. Despite her success she has never changed how well she loves people, her family and her community. When we are together, she is often recognized and she always has a kind word for everyone. She is an example of kindness and love for every people group in our community.

Since I've known Julie, she has elegantly juggled work and raising kids and has even taken in extra children that needed a stable home. Her character is beyond reproach. She is a woman of her word. She is one of the most consistent and dependable people in my life. Our conversations are never about material things, rather all the beautiful people in our lives that we are molding to be productive and caring citizens in our amazing country.

Julie takes care of everyone. Her parents, her mother in law, her husband, her children, their children, her friends and her community. I honestly don't how she does it. She has an amazing capacity to love and serve. I'm blessed to be her loving friend.

Thank you for reading this.

I'm available if you'd like to further discuss my friend, Julie.

Sincerely,

A handwritten signature in cursive script that reads "Rhonda Polhill". The signature is written in black ink and is positioned above the printed name and phone number.

Rhonda Polhill  
770-289-9338

October, 15, 2022

Honorable Eleanor L. Ross  
Judge  
United States District Court

Dear Judge Ross:

My name is Lynn Robbins. I am a resident of the state of South Carolina. I am a medical assistant. I have worked in Women's Health Care for over thirty years. It has been my heart to do so.

I am writing this letter in regards to Julie Chrisley.

Although I have known Julie for only a short time, I feel I can write this letter sincerely.

I, as many others, have followed their show, "Chrisley Knows Best", as well as listening to their podcast, "Chrisley Confessions". In doing so, I have always admired Julie's dedication and commitment to her family, and her implementation of guidance and accountability, as a wife, mother, and step mother. As a wife, mother, and a step mother myself, I feel that I relate to her in many ways and that is what led me to reach out to her and her family.

Graciously, she responded to me, a complete stranger. She didn't have to. But she did. We have grown in our friendship as time has gone by. We have shared our faith, encouragement, and I have grown only to respect her even more.

My husband and I have a daughter who has struggled with drug addiction. In talking with Todd and Julie, they have shared our hurt, pain, tears and prayers for our daughter. It was nothing but honest and sincere. We have been encouraged by their advice as parents and their prayers for our family. They are real people. I have found Julie and Todd to be honest and sincere in every way, and so unselfish with their hearts and time to others.

They have had nothing to gain by extending their friendship to me, yet I know, that does not matter to them. They just simply care about others. It's who they are.

I am truly thankful and appreciative to them for taking the time to talk, pray, and encourage my husband and myself, as Christians, as parents, and as friends. It has made a difference in our struggles and tears. Knowing other people care, when they don't have to, pray for you, when they don't have to, and feel your heart, when they don't have to, is exactly what our world needs.

I know I have a friend in Julie Chrisley and I know that I always will. I am so thankful for that gift. I trust it.

Sincerely,

A handwritten signature in cursive script that reads "Lynn Robbins". The signature is written in black ink and is positioned above the printed name.

Lynn Robbins

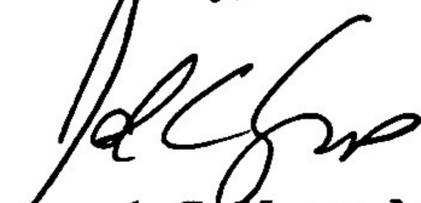
To the Honorable Eleanor L. Ross  
Judge US District Court:

I have known Julie Chrisley a number of years now as both a professional confidant as well as family friend. She has always been extremely generous with her time and advice.

I have always been able to count on her to do what she says, without fail. I have never felt once any semblance of dishonesty or ulterior motives in any of our personal or professional dealings. She is extremely generous and kind and it is clear to all whom interact with her that her ultimately focus is on her family and being a good person.

I can honestly say that I have never doubted the veracity of any of our interactions as evidenced by all of her actions and towards me as well as actions towards all of those close to her of which I am aware. Her deep respect and love for G-d are a guiding light in her life and give me great confidence in stating that I believe her to be a good and honest woman.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jacob G. Unger', written in a cursive style.

Jacob G. Unger, MD

Bryan D. Walker  
830 Glenwood Ave SE  
Unit 510-303  
Atlanta, GA 30316

Wednesday November 9, 2022

RE: Julie Chrisley Case

To The Honorable Judge Eleanor L. Ross, Judge United States District Court,

I am writing on behalf of Julie Chrisley. I had the pleasure of working with Mrs. Chrisley and her family on their reality show Chrisley Knows Best for the last 7 years. During this time, I've had the opportunity to get to know Julie and her family rather well. I've known Julie to be a strong woman, a mother, a nurturer, and a rock for her family. Throughout the years the crew has had their share of ups and downs ranging, from births, deaths, celebrations of home ownership, too college graduations. Julie's support through all of this has been a constant and one of encouragement. I have watched Julie jump to plan but mostly encourage and give a hug when needed and nudge when fear might be holding one back.

The last four years I have been the Talent Producer and I've worked closely with Julie in not only assisting with her film schedule but also the schedules of Grayson, Chloe, Nanny, Todd, and even sometimes Chase. She doesn't offer excuses but provides solutions with a smile. Most recently for my birthday last year Julie knows that I love Carrot Cake. Grayson had travel baseball, Chloe had a school project, we were filming, amongst other things that were going on in their lives but she made sure to make me a cake from scratch. Julie is the nucleus, the core, the heartbeat to all whom love her as she keeps things together. Its an honor to write this letter on her behalf as a woman who gives so much of herself to others.

Kind Regards,

A handwritten signature in black ink, appearing to read 'Bryan D. Walker', with a long horizontal flourish extending to the right.

Bryan D. Walker

Lee White  
4002 Lealand Lane  
Nashville, TN 37204

October 31, 2022

Honorable Eleanor L. Ross  
United States District Court  
1788 Richard B. Russell Federal Building and United States Courthouse  
75 Ted Turner Drive, SW  
Atlanta, GA 30303-3309

RE: Todd and Julie Chrisley

Your Honor,

My name is Lee White. I am a television agent and partner at one of the largest talent agencies in the entertainment industry. I have also represented the Chrisleys for over 8 years. In that time, Todd and Julie have become more than just clients. The Chrisleys are as close to genuine family as is possible. The relationship is unlike anything I've experienced in my 16 years in this career. In Hollywood, it is an unwritten rule never to blur the lines between business and personal relationships with clients. That is not the case with Todd and Julie.

As I write this letter, I am sitting in a hospital waiting room while my wife, Beth, who was recently diagnosed with Colon Cancer, is having a surgical procedure done which, God willing, will save her life. I tell you this because when we found out a month ago that Beth had cancer my first phone call was not to my parents, it was not to her parents, or even to our priest. My first phone call upon learning this earth-shattering news was to Todd and Julie. I knew in that devastating moment that I could count on the two of them to make sure that the love of my life, the mother of my children, would receive the very best care in the world.

Beth is currently being treated by one of the preeminent Colorectal Surgeons in the country because of Todd and Julie Chrisley. Full stop. It would have been completely understandable for anyone in their current situation to simply send well wishes and focus on their own problems, but not Todd and Julie. This is the perfect example of who they truly are as Christians. The version of Todd and Julie that was painted by the prosecution is totally antithetical to the people that we know and love.

My family and I are not alone. There are innumerable stories like ours from people who consider the Chrisleys a part of their own families and, like us, would be lost without them. Simply put, the world is a better place because of the selflessness and love that they show to anyone that comes into their lives. That is the Todd and Julie Chrisley that I know. We need more role models in our communities like this, not less.

I respectfully ask you to consider stories like mine while contemplating Todd and Julie Chrisley's legal case. I appreciate your time and consideration. We are forever indebted to noble public servants like yourself. Thank you for your service to our country.

Sincerely,



Lee White