

STATE OF SOUTH CAROLINA)
COUNTY OF GREENVILLE)

IN THE COURT OF GENERAL SESSIONS
THIRTEENTH JUDICIAL CIRCUIT

WARRANT NO(S): 2021A2330210207-08

Plaintiff,)

vs.)

ZACHARY HUGHES)

Defendant.)

**MEMORANDUM IN SUPPORT
OF MOTION FOR BOND**

22 APR 5 AM 11:49
Paul Wickersham, COC, GVL, SC

COMES NOW, the Defendant, Zachary Hughes, loving son and brother, former officer candidate of the United States Marine Corps, accomplished musician, and loyal friend, by and through the undersigned, for the purpose of requesting his pretrial release. The Court must grant Zack's Motion: Under South Carolina law, the Court does not have discretion to deny bail; of all the participants in this case he alone comes to this Court not having committed any crime; he has made tremendous contributions to his community and to his country throughout his young life; and the Court has conditions of bond available to it that can assure both that Zack comes to Court when required and that he poses no danger to the community.

FACTS

This memorandum will discuss the facts in two sections. First, it will discuss facts contained in the discovery the State has provided and in the public domain relevant to the issue of bail. Second, it will discuss facts about Zack that are relevant to the issue of bail.

The Facts Contained in the State's Discovery and in the Public Domain

At 11:08 A.M. on October 13, 2021, a deputy with the Greenville County Sheriff's Office arrived at a home on Canebrake Drive in Greenville County, South Carolina, after Bradly Post called 911 for help. A deputy arrived and saw Post outside the home talking on his cell phone. The deputy approached Post to try to determine what was happening. When the deputy began to

ask Post questions, Post instructed the deputy to wait as he continued to talk on his cell phone. According to the deputy, Post “was shaking a little but did not appear to be too upset.”¹

Post hung up the phone and told the deputy he decided to come to the residence after he attempted to call his fiancé, Christina Parcell, and she did not answer. According to Post, he entered the residence through the back door “as they always leave it unlocked,” and he found Parcell lifeless on the floor in the front living room.

Police did a sweep of the residence and found no one else inside. According to police reports, officers secured the residence and allowed no one else inside until EMS arrived. Emergency Medical Technicians noticed “multiple lacerations” to Parcell’s head and neck area.

The deputy who responded walked outside the residence and reestablished contact with Post for the purpose of continuing the investigation.² During the deputy’s interview, “Post became nervous and asked if he needed to speak with his lawyer.” Despite the fact the deputy was just “asking basic questions about the incident at the time, Post asked for his lawyer.” Post then provided the deputy with the name of the person whom he believed killed his fiancé, a name that was not Zachary Hughes.

For the rest of the day, law enforcement personnel collected evidence from the scene and talked with neighbors to try to determine if anybody saw anything. Police asked Post to accompany them while they searched the residence. Strangely, Post wore gloves during the process.

¹ Portions of this section in quotations come directly from police reports or other publicly available documents.

² Deputies also interviewed Post a few days after the incident. In this interview, Post refused to answer multiple questions and refused to provide the PIN number for Parcell’s phone until he could get advice from a lawyer.

While searching the residence, police found numerous pieces of evidence, including cocaine in the living room. Greenville County Sheriff's Office deputies cleared the residence hours later.

The investigation proceeded and police reports the State has produced in discovery reference in passing DNA evidence police seized that they believe connect Zack to the crime scene. The State has not produced any experts' reports that opine that any DNA police seized belong to Zack, and Zack has retained a DNA expert to challenge this evidence should the State produce expert opinion evidence that the DNA does belong to Zack.

In this case what is missing from the evidence the State has produced is arguably even more important than what is in the discovery. Missing from this evidence is any motive Zack would have had to harm Parcell. Also missing from the evidence is any connection between Zack and either Parcell or Post leading up to this incident.

Meanwhile, the police's investigation quickly uncovered why, in part, Post was acting nervous when the deputy responded. At the time of Parcell's death, Post was producing and/or distributing child pornography involving multiple minor children. Post is currently incarcerated in the Greenville County Detention Center³ awaiting trial on nine separate charges: seven counts of Sexual Exploitation of a Minor, one count of Criminal Sexual Conduct with a Minor, and one count of Buggery.

³ See Greenville County Detention Center Inmate Search, visited on March 13, 2022. https://app.greenvillecounty.org/inmate_search.htm.

The Facts about Zachary Hughes⁴

Zack is 29 years old and was born in Morro Bay, California. He is the son of Dave and Mindy Hughes,⁵ who have been married for over 46 years. Zack has a brother, Eli, who is 23 years old and lives in South Carolina.

David grew up in California, and he was a distance runner and surfer in his younger days. Mindy also was raised in California and had a love for books as a child. When he and Mindy decided they wanted to begin a family, it was important for them to instill in their children a love of the Lord and an appreciation for family. They believed the best place for them to accomplish these goals for their family was in Virginia, and Zack's parents brought him (and his brother) to live in Virginia when the two boys were young.

David and Mindy believe so strongly in family that they wanted to offer others in need the chance to be a part of their family. In 2005, David and Mindy adopted five children, all siblings, from Russia to provide these children with a better life. The addition of these children to the Hughes' family had a profound impact on Zack.

David and Mindy had saved money prior to leaving California, and the family lived on a small farm in Virginia. Between their savings and the small living they could make on the farm, David and Mindy both stayed at home to raise their seven children. But it wasn't enough. Zack's parents needed him to emerge as another caregiver for the kids in the family.

⁴ Under S.C. Code Ann. § 17-15-30(A)(4), a court is to consider, among other things, the defendant's character in determining whether the defendant is a danger to the community.

⁵ With the Court's permission, one or both of Zack's parents will be prepared to address the Court at the appropriate time during the hearing.

Unbeknown to any of the Hughes, most or all of these children suffered from significant emotional, psychological, and/or physical adversity due to maltreatment they had received in Russia. These children had difficulty adapting to America in general and family life in particular. This difficulty placed tremendous stress on each member of the Hughes family, especially Zack.

Zack's Music Career is born.

Zack turned to music as a refuge from this stress. Zack's parents bought him a piano at a yard sale for \$300 when he was 4 or 5 years old. His parents could see almost immediately that he had an aptitude for music, and he loved to play the piano. However, it was not until Zack's adopted siblings came to live with the family that Zack devoted the entirety of himself to piano.

Zack and his parents nurtured this aptitude through hard work and sacrifice, and it paid off for Zack. For example, in 2011 Zack won first prize in the prestigious Southeastern Piano Festival Arthur Fraser International Piano Competition while still in high school. In winning the competition, Zack earned the privilege of performing as a soloist with the South Carolina Philharmonic Orchestra for a performance of Beethoven's Emperor Concerto.

Eventually, Zack's gift received the ultimate recognition when he was granted admission into one of the most prestigious performing arts institutions in the world, The Juilliard School.⁶ Zack applied to Juilliard for piano performance in 2010, and he ultimately received a Bachelors of Music. The year Zack applied, only 7.2% of the students who applied for piano performance were accepted. Zack was not only accepted that year, but he was also given scholarships to attend.

⁶ "Founded in 1905, The Juilliard School is a world leader in performing arts." education.<https://www.google.com/search?client=safari&rls=en&q=julliaird&ie=UTF-8&oe=UTF-8>

Zack touched many lives while he was studying at Juilliard, both because of his musical talent and because of his friendship. Classmate Jules M. writes of Zack

What struck me the most when we first met was not only his deep kindness and great ability to laugh and make laugh, but also his profound and rare interest for the core of musical grammar as well as for new music.

Exhibit 35. Zack even agreed to play a Sonata that Jules had composed, and the gesture had a tremendous impact on Jules. “This was one of the most amazing moments of my professional life. I felt so grateful.” *Id.*

Rachel K., another classmate and friend of Zack’s from Juilliard, describes how she and Zack would perform for those for whom music could provide healing power: those in “hospitals, mental wards, and retirement homes.” Ex. 25. She describes in great detail how Zack helped her navigate a difficult circumstance with a person in authority just by acting as her confidant and by patiently listening. Exhibit 25. According to Rachel,

If I were to describe Zack in a few words it would be: loyal friend, strong sense of what is morally right and wrong, a big heart for defending those he is close to from harm, and a very patient listener.”

Exhibit 25, at 2-3.

While at Juilliard, Zack continued to evolve as a musician. Among his many accomplishments was being chosen to play in the Kyoto International Music Festival. Only about 12 students from around the world were invited to participate, and Zack was the only one chosen from the United States.

Zack’s Service in the Military

Hard work and service are core virtues in the Hughes family. Zack wanted to put these values to work in a meaningful way to serve not only his community but also his country. In 2018,

Zack volunteered to serve in the United States Marine Corps. At the time, Zack was pursuing a masters degree in piano performance at the University of Tennessee, but he realized he wanted to do more and do it quickly. He initially applied as an enlisted soldier, but the recruiter instructed Zack to apply for Officer Candidate School (OCS) instead. He saw that Zack was special.

In Tennessee, Marine Corps personnel convene boards three times a year to evaluate the suitability of candidates for OCS. Zack was the only candidate from Tennessee the board accepted during that cycle. Three weeks into OCS, Zack suffered stress fractures in both of his legs, and he had to withdraw. At the time of his injury, Zack's superiors told him he was in the top 3% of his OCS class, which was comprised of approximately 400 students. They encouraged him to come back once he healed.

Zack's Return to South Carolina

While Zack was recovering from his injury, a friend contacted him with a request. The friend knew a woman named Jeannette Winn who lived in Greenville. Winn's church had just received a gift in the form of one of the highest quality pianos in the world, and Winn was looking for a pianist who was worthy of playing its inaugural performance at the church. The friend recommended Zack to Winn, and Zack agreed to do the piano performance at the church in 2019.

After the performance, Zack and the Winn family developed a friendship, and Zack shared with the family a goal he had long had. Zack admired Beethoven, and he had a dream of performing all 32 of Beethoven's sonatas by memory during the 250th anniversary of his birth, 2020. The Winns and their church immediately supported this idea, and Zack knew then he would not return to the Marine Corps.

Zack's Performance of the 32 Sonatas and gift of music during the pandemic

Zack and the church reached an agreement. Zack needed to be able to support himself while he was working on the Beethoven project, but he wanted to make sure the church received a benefit from his hard work. They agreed that the church would request a donation from all those who attended these performances, and the donations would be split evenly between Zack and the church.

It would take Zack approximately two years to complete the project. Beethoven's Sonatas are considered to be some of the most difficult music ever composed for piano and consist of approximately 600 pages of sheet music. His plan was to perform all 32 sonatas in 13 performances. Zack was able to complete three performances at the church before the Covid-19 pandemic arrived in 2020. Prohibitions against large gatherings made performances at the church no longer possible. Zack didn't let this stop him. He bought an electric keyboard and shared his music with citizens of Greenville by playing on street corners downtown. Zack also undertook to have the sonatas recorded. He partnered with Greenville's Sigal Music Museum to have his performances of the sonatas captured on video and audio and, ultimately, between December of 2020 and September of 2021, Zack performed and recorded all of the 32 sonatas.⁷ "The human element of the music was the gift to the community," Zack recalls.

Zack also knew it was important for people to come together, despite the pandemic. He decided to participate in free, outdoor concerts so people could enjoy his music live and safely.

⁷ The links to each recording are attached to this memorandum as Exhibit 1.

Professor Briggs, Professor of Music at Juilliard, describes how Zack channeled his talent and his love of Beethoven to lift people's spirits during the pandemic.

His love of Beethoven, and specifically the piano sonatas, bore fruit when, during the covid pandemic, he took his art to the world through the "Beethoven Project." One only need to go (online) . . . to see . . . him playing the complete 32 sonatas of Beethoven. . . . [T]o learn them all and perform them at his young age is a remarkable achievement. Watching him play them, even outside, to his friends, neighbors, and the community was inspiring and moving, to say the least.

Exhibit 4.

In addition to performing, Zack also has a passion for teaching music to young people, and he continued to give piano lessons remotely during the pandemic through the Bronx Conservatory of Music. As a mother of one of Zack's piano students so eloquently writes

I can undoubtedly say that Zack is absolutely the most patient, gentle, and best teacher we have ever seen before.

Exhibit 14.

Dr. Rackers, Professor of Music at the Eastman School of Music, sums up best what the music community would like the Court to know about Zack. After praising Zack for winning the Southeastern Musical Festival and for performing as a soloist with the South Carolina Philharmonic Orchestra, Dr. Rackers states unequivocally

Zack is a kind and helpful person that cares deeply about each person that he meets and works with. He is a highly valued member of the South Carolina Arts community and has been invaluable as a performer, volunteer, and friend of many throughout South Carolina. He is not a danger to the community or a flight risk, having no criminal record and close ties to his family, friends, and numerous organizations throughout the state. As a teacher, friend, and colleague of Zack for 11 years, I have no doubt that he poses no danger to the community and strongly believe that he should be granted bond. . . ."

Exhibit 45.

Zack's Behavior Since the Prosecution Began

Put simply, everything Zack has done since police obtained warrants for his arrest have been the actions of an innocent man. At the time police obtained arrest warrants for Zack, he had been hired to perform for an international cruise line. Zack was informed that warrants were pending while he was in Detroit, Michigan, waiting to board a flight for Europe the next day, a planned trip to prepare for his new job. From his location, he could literally see the American/Canadian border. He literally could have walked into Canada, or he could have boarded his plane the next day and left for Europe. Had he left the United States, it would have been difficult for the State to facilitate Zack's return to the United States, especially if Zack had travelled to a non-extradition country. But, Zack didn't leave. He told his lawyers that he would be returning to Greenville as soon as possible to stand trial, and he did. Zack rented a car in Detroit and drove to Greenville directly, turning himself into the Greenville County Sheriff's Office on November 3, 2021.

ARGUMENT

Zack is neither a danger to the community nor a flight risk, and this Court has available to it conditions of bail (home incarceration and GPS monitoring, among many) that can more than sufficiently assure his appearance in court and protect the public.

The Law

As this Court knows, the South Carolina Constitution provides the Court with discretion to set bail even in capital cases. See generally, *State v. Hill*, 314 S.C. 330, 332, 444 S.E.2d 255, 256 (1994) (“[W]e hold that the Constitution gives a circuit court judge the discretion to grant

bail to a capital defendant.”). The General Assembly has even gone so far as to mandate the setting of bail in non-capital cases like this one.⁸

In a 2004 Superseding Administrative Order signed by five circuit judges of the 13th Judicial Circuit, one of whom now sits as an Associate Justice of the South Carolina Supreme Court and another of whom now sits as a Judge on the South Carolina Court of Appeals, these five circuit judges recognized that a defendant charged with a non-capital offense must be granted bail. See Ex. 2, at 2.

Pursuant to S.C. Code Ann § 17-15-10(A), “[a] person charged with a noncapital offense . . . shall, at his appearance before any of such courts, be ordered released pending trial on his own recognizance without surety in an amount specified by the court. . . .” (Emphasis added). “Only two exceptions to this requirement are set forth in the statute, ‘unless the court determines in its discretion that such a release will not reasonably assure the appearance of the person as required, or unreasonable danger will result.’” See Ex. 2, at 2. “The burden of establishing these exceptions necessarily falls to the State. . . .” *Id.* “The plain language of § 17-15-10 permits use of surety bonds only in extraordinary circumstances based upon an affirmative showing of need.” *Id.*, at 3.

Should a court determine that a personal recognizance bond “will not” assure the defendant’s appearance in court or an “unreasonable” danger to the community “will result,” the

⁸ *Hill*, 314 S.C. at 332, 444 S.E.2d at 256, n. 2 (citing S.C. Code Ann § 17-15-10 through 260) (“It should be noted that although the Constitution indicates that bail for offenses punishable by life imprisonment may be treated differently, the statutes of this State regarding bail treat all non-capital offenses in the same manner.”)

Court must still release the defendant on bail but impose added conditions of bail which will secure the defendant's appearance and protect the public. These conditions are:

- (1) require the execution of an appearance bond in a specified amount with good and sufficient surety or sureties approved by the court;
- (2) place the person in the custody of a designated person or organization agreeing to supervise him;
- (3) place restrictions on the travel, association, or place of abode of the person during the period of release;
- (4) impose any other conditions deemed reasonably necessary to assure appearance as required, including a condition that the person return to custody after specified hours.

S.C. Code Ann. § 17-15-10(A)(1-4).⁹

South Carolina law is clear: a court must release on bail a defendant who is charged with a non-capital offense, like Zack. The only questions the Court must answer are: (1) must the defendant be released on his or her own recognizance? (2) if not, what additional conditions of release must be imposed to ensure the defendant does not flee and does not present an unreasonable danger to the community?

Under what conditions should Zack be released?

Upon release from jail, Zack will neither pose a flight risk nor a danger to the community.

Below are just some of the reasons why:

⁹ S.C. Code Ann. § 17-15-20 also adds what appears to be generic conditions to every order of bail, whether a personal recognizance bond or a surety bond. Included in these conditions are that the defendant is to be on good behavior while on release and not to leave the State of South Carolina.

- Zack returned to South Carolina to stand trial instead of leaving the country, which he easily could have, after learning warrants were pending for his arrest;
- He has no prior record;
- His parents and other family members live in the Upstate of South Carolina;
- He has a cadre of family, friends, fellow musicians, teachers, and others who unequivocally support him and his request for bail and have attested to his good character (see exhibits 3-52);
- Both his parents and the Winn family have agreed to allow him to live with them under any conditions the Court imposes as prerequisites to bail, including home incarceration and/or electronic monitoring;
- The State has simply no evidence as to what if any motive Zack would have to harm, let alone kill, Parcell; and, most importantly;
- He is not guilty of the crimes with which he has been charged.

Although some defendant(s) with pending murder charge(s) in Greenville County currently are released from jail on their own recognizance;¹⁰ Zack understands the universe of information the Court can consider for the purposes of setting bail is almost unlimited. The salacious nature of the State's allegations, which will not be supported in fact, will likely prompt the Court to fashion conditions of bail that will provide comfort to the community and to Parcell's family. Zack believes bail in the amount of \$100,000 to be satisfied only by a surety bond, with the added conditions that he be on home confinement either at his parents' home or the Winns' home

¹⁰ E.g., Winter Mance, warrant number 2017A2330208988

(whichever the Court chooses), and that he have no contact with Parcell's family would be more than sufficient to properly protect the public and to ensure his appearance in Court.

CONCLUSION

Zack remains innocent until proven guilty. Zack is not guilty of the crimes with which the State has charged him. In light of the significant defects in the State's case against him, his lack of any criminal history, his surrender to authorities when he could have easily left the country never to return, his good character as proven by the outpouring of support contained in exhibits 3-54, his family and friends' willingness to house him while he is on release, and the multitude of conditions the Court can impose in its order for bail to protect the public and ensure his appearance, Zack asks that the Court order his release pursuant to the aforementioned conditions.

Respectfully submitted,

s/Andrew B. Moorman

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EXHIBIT 1

Piano Sonata No.1 in F minor, Op.2 No.1 on 1784 Stein Fortepiano
<https://youtu.be/10q6UZm31F0>

Piano Sonata No.1 in F minor, Op.2 No.1
<https://youtu.be/iWjukvrfadQ>

Piano Sonata No.2 in A Major, Op.2 No.2
https://youtu.be/u_kcb5odDQg

Piano Sonata No.3 in C Major, Op.2 No.3
<https://youtu.be/-Wcveh5ro0Y>

Piano Sonata No.4 in E-flat Major, Op.7
<https://youtu.be/wEVtIbng3JI>

Piano Sonata No.5 in C minor, Op.10 No.1
<https://youtu.be/AIZFMRF7O7I>

Piano Sonata No.6 in F Major, Op.10 No.2
https://youtu.be/zv13_LN4sGk

Piano Sonata No.7 in D Major, Op.10 No.3
<https://youtu.be/B0uHUR4Wkqc>

Piano Sonata No.8 in C minor, Op.13 "Pathétique" on 1784 Stein Fortepiano
<https://youtu.be/8FUv2kOLxGI>

Piano Sonata No.8 in C minor, Op.13 "Pathétique"
<https://youtu.be/7HJJCqYxNIg>

Piano Sonata No.9 in E Major, Op.14 No.1
<https://youtu.be/F7d-7iOty-Y>

Piano Sonata No.10 in G Major, Op.14 No.2
<https://youtu.be/FBiySOwG0EI>

Piano Sonata No.11 in B-flat Major, Op.22
<https://youtu.be/LbaxXAy7twA>

Piano Sonata No.12 in A-flat Major, Op.26
https://youtu.be/iTkNPrVv_B8

Piano Sonata No.13 in E-flat Major, Op.27 No.1
<https://youtu.be/Dnhd-idiqwk>

Piano Sonata No.14 in C-sharp minor, Op.27 No.2 "Moonlight" on 1815 Walter
Fortepiano

<https://youtu.be/soKYDE2U1C0>

Sonata No.14 in C-sharp minor, Op.27 No.2 "Moonlight"

https://youtu.be/E_P8uz7eSCc

Piano Sonata No.15 in D Major Op.28 "Pastorale"

<https://youtu.be/pZS1MHn7aeU>

Piano Sonata No.16 in G Major Op.31 No.1

<https://youtu.be/G76egkY8oz4>

Piano Sonata No.17 in D minor Op.31 No.2 "Tempest"

https://youtu.be/_uxvzNLMe-A

Piano Sonata No.18 in E-flat Major Op.31 No.3

<https://youtu.be/QflxLLl6Ngs>

Piano Sonata No.19 in G minor Op.49 No.1

<https://youtu.be/FE4q6iBqwpQ>

Piano Sonata No.20 in G Major Op.49 No.2

https://youtu.be/5_4VAd1QuEg

Piano Sonata No.21 in C Major Op.53 "Waldstein"

<https://youtu.be/u9ihXyLeLAA>

Piano Sonata No.22 in F Major Op.54

<https://youtu.be/RAnlAUuGzgY>

Piano Sonata No.23 in F minor Op.57 "Appassionata"

<https://youtu.be/YAY5JWfk9nA>

Piano Sonata No.24 in F-sharp Major Op.78

<https://youtu.be/lxAF272xQbw>

Piano Sonata No.25 in G Major Op.79

<https://youtu.be/kPSiM0GEXFA>

Piano Sonata No.26 in E-flat Major Op.81a "Les Adieux"

<https://youtu.be/rQzYqRcydI4>

Piano Sonata No.27 in E minor Op.90

https://youtu.be/BaQkdWxf_BQ

Piano Sonata No.28 in A Major Op.101

<https://youtu.be/hD0Bhu9-6SU>

Piano Sonata No.29 in B-flat Major Op.106 "Hammerklavier"

<https://youtu.be/FGquss22ob8>

Beethoven Piano Sonata No.30 in E Major Op.109

<https://youtu.be/aqwS2x1xkZc>

Piano Sonata No.31 in A-flat Major Op.110

<https://youtu.be/6qi07oPIGY8>

Piano Sonata No.32 in C minor Op.111

<https://youtu.be/WxZJUFQM1xY>

EXHIBIT 2

STATE OF SOUTH CAROLINA
COUNTY OF GREENVILLE

IN THE COURT OF GENERAL SESSIONS

IN RE:

BAIL, RECOGNIZANCES,
THE HOME DETENTION ACT
&
ELECTRONIC MONITORING.

SUPERSEDING
ADMINISTRATIVE ORDER

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Since April of 1993, Greenville County, through the Detention Center, has operated an electronic monitoring program, known as the Home Incarceration Program (HIP) pursuant to the enabling legislation of §§24-13-1510, *et seq.*, *Code of Laws of South Carolina* (1976, as amended), and an Administrative Order of this Court dated April 5, 1993. On February 2, 1998, Greenville County entered into an Electronic Monitoring contractual agreement to provide 24-hour monitoring services for electronic monitoring participants and other supervision programs. Though the program has been used as an alternative to incarceration, following sentencing of qualified offenders, it may also be used as a condition of bond. Detention personnel using guidelines established by the statutes and the Administrative Order have selected these persons.

Under Greenville County's program (HIP), if the sentence is silent on any requirement for home detention and/or monitoring, detention personnel are authorized to screen the offender(s) for house arrest with electronic monitoring. Due to the nature and technology of electronic monitoring, the sentence may be served in an approved jurisdiction other than Greenville County. Upon finding the offender qualified, detention personnel will submit an Order of Enrollment form (Attachment B) to the sentencing judge. Use of this Order provides a review of HIP candidates which allows the sentencing judge to reject an otherwise qualified candidate from consideration and enrollment in HIP. The Court therefore finds and concludes that execution of the attached order, "Attachment B," is required to enroll future candidates in HIP when the program is utilized as an alternative to the service of an active sentence.

With the Home Detention Act of 1990, §§24-13-1510, *et seq.*, *Code of Laws of South Carolina* (1976, as amended), our State Legislature established a means of control and supervision of certain criminal offenders that were qualified under a stringent set of guidelines. In its pure form the act creates a new form of sentence available to the offender, a true alternative to active time in a jail or penitentiary cell. Such a sentence, standing alone, precludes home detention and/or electronic monitoring as an alternative for persons convicted of certain violent crimes and drug offenses. Provision was made however, in §24-13-1590, to ensure that when traditional sentencing of active time or probation was imposed, the sentence could include house arrest and/or monitoring as conditions of probation and parole.

While the Act also provides these methods of supervision as an alternative to pretrial detention for persons charged with all but certain violent crimes and drug offenses, it does not address use of home detention and/or electronic monitoring as an additional condition of bail for otherwise unqualified HIP candidates. Such conditions have been ordered by the Courts of General Sessions in cases involving defendants with pending charges of violence and/or drugs. The apparent disparity between the Court ordered conditions of bail and local guidelines for direct release into HIP is another area of concern to be addressed.

§17-15-10 *Code of Laws of South Carolina* (1976, as amended) provides in part:

“Any person charged with a non capital offense triable in either the magistrate’s, county, or circuit court, shall, at his appearance before any such courts, be ordered released pending trial on his own recognizance without surety in an amount specified by the court...”(emphasis added).

Only two exceptions to this requirement are set forth in the statute, “...unless the court determines in its discretion that such a release will not reasonably assure the appearance of the person as required, or unreasonable danger will result.” The burden of establishing these exceptions necessarily falls to the State, either in the person of the arresting officer, prosecuting witness or solicitor.

The plain language of §17-15-10 permits use of surety bonds only in extraordinary circumstances based upon an affirmative showing of need. While acknowledging the long standing practice of a surety bond requirement as a matter of course in most cases, the law is to the contrary.

The Court therefore finds and concludes that a strict interpretation of §17-15-10 mandates a review of each defendant's case in a light that favors the grant of a personal recognizance bond pending disposition of the charges. Although no precise standard can be established for such a review, marginal cases can be adequately addressed through the use of additional conditions placed on the defendant as set forth in §17-15-10:

- “(a) Require the execution of an appearance bond in a specified amount with good and sufficient surety or sureties approved by the court;
- (b) Place the person in custody of a designated person or organization agreeing to supervise him;
- (c) Place restrictions on travel, association or place of abode of the person during the period of release;
- (d) Impose any other conditions deemed reasonable necessary to assure the appearance as required, including a condition that the person return to custody after specified hours.” (emphasis added).

The Court must review available information in the case of a defendant; taking into account the nature and circumstances of the offenses charged, the accused's family ties, employment, financial resources character and mental condition, the length of his residence in the community, his record of convictions, and any record of flight to avoid prosecution or failure to appear at other court proceedings; as required under §17-15-30 *Code of Laws of South Carolina* (1976, as amended). The Court then determines, in its discretion, if the State has made a showing of need for a surety bond and/or other additional conditions based on extraordinary circumstances.

Our Supreme Court has established various rules of construction that the Courts must use in construing the language of state statutes such as the home detention statutes and those related to the bail process. One such rule of construction requires courts to construe laws that are penal in nature strictly against the State and in favor of the accused. *Williams v. State*, 410 S.E. 2d 563 (1991); *Hair v. State*, 406 S.E.2d 332; *State v. Cutler*, 264 S.E.2d 420, 274 S.C.376; *State v. McCord*, 187 S.E.2d 654 S.C. 163.

Certainly, statutes related to the deprivation of liberty in a pretrial setting, where no adjudication of guilt has occurred, i.e. bail considerations, MUST be liberally constructed under our rules of construction. The home detention statutory scheme, as well as the bail statutes outlined above, are all penal in nature; thereby meriting liberal construction by the Court, in favor of criminal defendants.

§§17-15-10 *et seq.* and §§24-13-1510 *et. seq.* make reference to similar subject matter, to wit: the regulation of persons charged with crimes in a pretrial setting and the manner and means of appropriate pretrial supervision. When provisions of law appear in conflict, while addressing similar subject matter, a second rule of construction is utilized to prevent disparity.

Such statutes stand in *pari materia* and must be read together and reconciled if possible so as to give meaning to each and avoid an absurd result. *Powell v. Red Carpet Lounge*, 311 S.E. 2d 719 (1984); *State el rel McLeod v. Montgomery*, 244 S.C.308 S.E.2d 778 (1964); *Stone & Clamp, General Contractors v. Holmes*, 217 S.C. 203, 60 S.E.2d 231 (1950).

The statutes relating to the courts' authority to set conditions of release upon application for bail by a criminal defendant are limited only by the court's determination of reasonableness in a given circumstance. In addition, §24-13-1590 provides, "[n]othing in this article:... (2) diminishes the lawful authority of the courts of this state...to regulate or impose conditions for probation and parole." When these statutes are read together, the regulation of bail matters under §17-15-10 must be appended to §24-13-1590(2) to avoid an otherwise absurd result.

The Court therefore finds and concludes that the statutes is question, relating to pretrial detention and bail, are in *pari materia*, and a consistent reading of these provisions empowers the Court to impose electronic monitoring as administered under the Home Detention Act as a condition of any defendant's bail.

THEREFORE, IT IS HEREBY ORDERED that the original Administrative Order creating the Greenville County Home Incarceration Program, of February 17, 1995, be and is hereby superseded by this Order and its attached documents.

IT IS FURTHER ORDERED that the following regulations be substituted under the authority of §§ 23-13-1510 *et seq.* and §§ 17-15-10 *Code of Laws of South Carolina* (1976, as amended); to provide for home detention and electronic monitoring of certain convicted offenders and persons charged with crimes as administered by the Greenville County Detention Center.

1. The Jail Administrator of the Greenville County Detention Center, or his designee, shall be authorized to select candidates for HIP enrollment from pretrial detainees confined in the Detention Center pending admission to bail pursuant to the guidelines enumerated in §24-13-1530 and local guidelines appended to this Administrative Order as "Attachment A."

2. The Jail Administrator of the Greenville County Detention Center, or his designee, shall be authorized to select candidates for HIP enrollment from those convicted offenders sentenced to incarceration that would otherwise be served at the Detention Center, pursuant to the guidelines enumerated in §24-13-1530 and local guidelines appended to this Administrative Order as "Attachment A."

3. Upon selection of a candidate, the screening personnel shall submit an Order of Enrollment for execution by the Court; the form order is appended herewith as "Attachment B."

4. Each enrollee shall execute an agreement, "Attachment C," with HIP personnel and an explanation of this agreement shall be a part of all training for the enrollee's participation in HIP. A copy of the executed agreement shall be delivered to the participant and a copy maintained for program use.

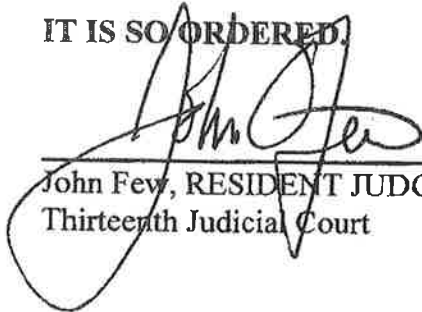
5. The HIP personnel shall coordinate placement with the charging law enforcement agency and the Solicitor's Office prior to execution of the Order of Enrollment to insure notice to all parties, including victims if necessary.

6. The Jail Administrator of the Greenville County Detention Center, or his designee, shall be authorized to immediately take into custody any participant enrolled in the Home Incarceration Program (HIP) in the event the participant violates the terms and conditions of the HIP program. The participant will be held in custody, without bond, pending a violation hearing. A violation hearing is to be heard within a reasonable time from the date of detainment. With serious violations or exigent circumstances, the Jail Administrator, or his designee, will apply for a Bench Warrant for the participant's arrest, whereas a violation hearing will be


scheduled within a reasonable time from the date of detainment. The application shall be made using the attached form "Attachment D."

7. The Court and/or the Jail Administrator of the Detention Center shall convene a quarterly meeting of the following persons for a review of the procedures set forth in this Administrative Order, and the associated procedures of the HIP program, to insure the effective administration of justice. The reviewing panel shall consist of the Jail Administrator of the Greenville County Detention Center or his designee, the Solicitor of the Thirteenth Judicial Circuit or his designee, the Sheriff of Greenville County or his designee, the Public Defender for Greenville County and the Chief Judge for Administration of the Court of General Sessions.


IT IS SO ORDERED.




John Few, RESIDENT JUDGE,
Thirteenth Judicial Court



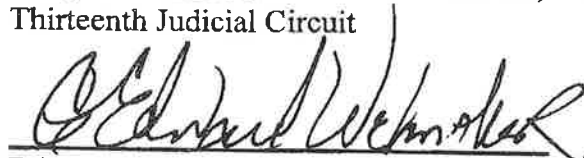
Garrison D. Hill, RESIDENT JUDGE
Thirteenth Judicial Circuit



Larry R. Patterson, RESIDENT JUDGE,
Thirteenth Judicial Circuit



Edward Miller, JUDGE AT LARGE,
At Chambers




Edward Wellmaker, RESIDENT JUDGE,
Thirteenth Judicial Court

Greenville, South Carolina

May _____, 2004

EXHIBIT 3

Rembert Stokes



February 25, 2022

To Whom It May Concern,

Subject: Support for Zachary Hughes

In the spring of 2019, I gave a Bosendorfer Imperial Concert Grand Piano to a church in Greenville, SC, and was looking for a local pianist to perform a dedication concert. Friends suggested I listen to recordings by Zachary Hughes that he had posted on YouTube. I did and was thoroughly impressed with his talent. The church and I contacted Zachary and asked him to perform the dedication concert. At first, he was reluctant, fearing that we had a typical church piano. When we informed him that he would be playing on a Bosendorfer, he accepted. In June he gave an absolutely brilliant concert that thrilled the audience. I was so impressed that I pledged to follow this young talent in his career.

The next year, 2020, was the 250th anniversary of Beethoven's birth year. Zachary celebrated the year by learning all 32 of the Beethoven sonatas. This consists of over 600 pages of some of the most difficult music ever composed for the piano. In addition, he pledged to perform all of these sonatas in a series of concerts throughout the year. Unfortunately, Covid-19 prevented the live concerts from happening. So Zachary learned the 32 sonatas and recorded them at a local recording studio. Zachary and I had stayed in contact through the year, and he sent me an email with all of the 32 recordings in it. Such a generous gesture on his part.

In 2021, when the pandemic began to wane, Gloria Kinney and I hired Zachary to come to Chicago for a week and perform free concerts. One was performed at the Roosevelt University Institute for Continued Learning. The other two were given at continuing care retirement centers, namely, Friendship Village in Schaumburg and The Garlands of Barrington, where I live. In addition to being a skilled musician, Zachary is also an accomplished speaker and introduced each sonata with an historical narrative about the piece. All three concerts were a smashing success, and the local management urged me to bring him back for more concerts. I have every intention of doing so.

While he was in Chicago, he stayed at The Garlands and spent quite a bit of time in my unit. This gave us ample opportunity for discussion. I found him to be intellectually bright, spiritually sensitive, of high character, and responsible for the many things he pledged to accomplish. Through the three years I have known him, my respect has grown continuously. If he is released from jail, I do not see him being a threat to the community, nor do I see his being a risk for flight since he is known and respected in the community for his music.

Sincerely,
Rembert Stokes

EXHIBIT 4

March 6, 2022

To Whom It May Concern:

My name is Kendall Durelle Briggs and I was one of Mr. Hughes' professors at The Juilliard School where he studied toward his degree in Piano Performance under the renowned pianist and pedagogue, Jerome Lowenthal.

It was my great pleasure to have Zach in my courses during his tenure there. Not only is he a remarkable pianist and musician, but also a very kind, caring and congenial colleague, both toward his fellow classmates and to the faculty and administration, as well.

He was well loved by his friends, and although I did not socialize with him personally outside of school, he was always surrounded by his friends and actively engaged in musical and social activities associated with and outside The Juilliard School.

My personal interactions with him before, during and after his classes demonstrated a very intelligent, curious and interested scholar of music, art, history and literature. His love of Beethoven and, specifically, the piano sonatas bore fruit when, during the covid pandemic, he took his art to the world through "The Beethoven Project". One only need to go to his Facebook page and other social media outlets to see photos and videos of him playing the complete 32 sonatas of Beethoven. These works are the cornerstones of the piano literature, and to learn them all and perform them at his young age is a remarkable achievement. Watching him play them, even outside, to his friends, neighbors and the community was inspiring and moving, to say the least.

This kind of love for his fellow man was evident when he was at Juilliard. His desire to share his love of music was constant and always the motivating factor behind his works and acts. During his last semester with me, the class had often joked about having a celebratory party. The class was particularly close and there was a wonderful bond between all the students. On the last day of class, Zach, to the surprise of everyone, including me, brought food, drink and fun for the whole class to celebrate our semester together. This was done on his own initiative without the help of others. It was the only time in all the years that I have been on faculty at The Juilliard School that any student had gone out of their way to celebrate, in this fashion, at the end of a semester. To me this demonstrates the kind heart, thoughtfulness and caring he has within him.

Knowing Zach for all the years he was at Juilliard, and also after his graduation, I know with certainty that he is absolutely no threat to anyone. There is nothing I know of nor can point to that would make me worry about his release. In fact, his release would only continue to demonstrate that he is still the same responsible man I know him to be. The legal proceedings that must take place in the future will have their outcomes. But until then, there is no reason why Zach should not be allowed to have his freedom until those proceedings begin. He is absolutely of no flight risk at all, and he is of no personal risk to anyone else, including himself! Of this, I am certain and know without a doubt!

Should you need anything else from me, I am

Very sincerely yours,



Kendall Durelle Briggs, DMA
Professor of Music
The Juilliard School

EXHIBIT 5

From: Chih-Long Hu [REDACTED]
Subject: Re: Zack Hughes

My name is Chih-Lon Hu. I am a concert pianist and professor of piano at the University of Tennessee.

I met Zachary Hughes in 2007 in Johnson City. He attended my piano masterclass hosted by East Tennessee State University, where I was teaching at that time. He then started to study with me privately until he got accepted to the Juilliard School and moved to New York City four years later. We remained in communication throughout the years. He enrolled in the university of Tennessee master's program in 2017, but decided to leave after one semester.

Zachary's musical talent was unmeasurable, and he has a thorough understanding of humanity and artistic expressions. He comes from a Christian family that values education and integrity. Zachary has always been a polite, understanding and honest person. He has never shown any aggression or dangerous behavior for the years I've known him. The news I read about his case was a complete shock to me, and it is hard for me to believe it was truthful.

I believe Zachary Hughes to be an honest and responsible person, who will not be a harm to anyone around him. Feel free to contact me if you have further questions.

best regards,
Chih-Long Hu, D.M.A.
Sandra G. Powell Endowed Professor of Piano
Keyboard Area Coordinator
The University of Tennessee
[REDACTED]

EXHIBIT 6



Thomas Strange

February 9, 2022

[REDACTED]

To Whom it may concern,

This letter is written in support of Mr. Zachary Hughes, who is under consideration for a bond release, until the date of his trial is set.

I have known of and followed Zack for a number of years now as he has grown in his piano training, and particularly over the last two years as Zack took on the 'Mt. Everest' project of recording all 32 sonatas by Beethoven, in recital mode (four camera arrangement, no edits during a movement, all from memory). His talents at the keyboard are superior, his scholarship is careful and insightful, he is personally engaging and collaborative, and in all ways, Zack is a consummate professional.

My background is largely as a technologist, a native of South Carolina, with a continuous career developing critical technologies in the state. My last thirty years involved the founding and management of a company that is now Abbott Labs in SC, in Liberty, and revolutionized pacemaker and implantable defibrillator technology, managing a department of 30 individuals and an annual budget of over \$15MM, and retired in 2020 to run the Sigal Music Museum in downtown Greenville. I have worked with thousands of professionals and I know character when I encounter it.

In the intensive period I spent with Zack, we made 30 recording dates, lasting roughly 4 hours each, over the last half of 2020 and all of 2021 until our completion October 1st, 2021. During all of this time, with intense emotion and work on the line, it was my job as artistic director and sound engineer to counsel Zack on each element of his performance. This was not always welcome feedback, but in every case, Zack exhibited the highest professionalism, and was in fact, a delight to work with. We would often break and have supper at my house in Easley, where I was able to observe Zack in other interpersonal interactions. We also had Zack attend performances of other players, often dining out after these performances as well. All in all I have spent hundreds of hours with Zack over the last 1 ½ years.

Zack has never flashed anger, spoken harshly of others, implied or overtly threatened anyone, engaged in bullying, or in any way become a target of uneasy feelings from others. In all the times we spoke, he never once mentioned the victim in this case, by name or by person, nor seemed to be engaged in any activity that was not aligned with his stated goals of shaping a professional pianist career. We certainly were together enough, in sufficiently different circumstances, sometimes engaging in fundamental discussions of who Zack was today and where he wanted to be, for something to have emerged.

In my considered opinion, some sort of mistake has been made in this case. I was not simply surprised at the arrest; it was not in any way a logical possibility. The amount of dissimulation and acting required to pull this off in front of so many professional people is simply beyond Zack's training and ability.

As to his being a danger to the community, this is rubbish. He is not an angry person, he is instead quite a gentleman, he has never shown the slightest tendency to physically strike out, never spoken favorably of those who do, never gloried in violence or hurtful acts, and is actually a dedicated pianist, who has not even murdered the time, while playing a musical selection.

Being that he is a gentleman, I equally convinced he has no plans to flee from justice. He purposely returned to SC and voluntarily turned himself in as soon as he knew there was a charge against him, and has cooperated with the police to the extent that he is able.

Zack is a solid professional, whose future has been clouded, but by no means destroyed by the unfolding of these events. He has a community of solid friends of professional rank to help him through this, and help reset him on a path to success and productivity in the event of a favorable outcome. To this end, I am personally asking that he be considered for a reasonable bond to be set, and pledge to help him prepare for next steps.

Kindest Regards,

A handwritten signature in black ink, appearing to read "Thomas Strange", written in a cursive style.

Dr. Thomas Strange

Executive Director

Sigal Music Museum

Abbott Research Fellow / Fellow AIMBE

EXHIBIT 7



Lydia Mihelič Pulsipher, MA, PhD.
Consulate of the Republic of Slovenia

Mark Moyer
Moyer Law Firm, LLC
864.775.5811

Dear Mr. Moyer,

I am writing in support of Zack Hughes, whom I have known for at least five years. Zack is a consummate pianist who often came to my home with other Knoxville Symphony Orchestra musicians who are close friends of our family. He has frequently played in house concerts here and most recently joined the violinist Robyn Quinnett in a performance at the memorial gathering, July 9, 2021, for my deceased husband, Dr. Conrad McCall Goodwin (Mac).

I have always known Zack to be quiet, thoughtful and considerate. When here, he has always wanted to be helpful. My husband and I occasionally had brief but deep conversations with Zack, during which he impressed us both with his maturity and cordial demeanor. If asked, I would be inclined to trust him with my home, my pets and my possessions.

If there is some way that I could contribute to a useful and invigorating future for Zack, I would be pleased to do so.

Sincerely,

Lydia Mihelič Pulsipher

EXHIBIT 8

February 13, 2022

Ref: Reference for Zackary Hughes

Emailed: Andrew Moorman (andy@andymoormanlaw.com)
Mark Moyer (mark@markmoyerlaw.com)

To Whom It May Concern:

Please accept this letter as my personal reference for Zackary "Zack" Hughes.

I am the CFO of a textile facility in Landrum, SC. In early 2020, a contractor Zack was employed by was awarded a painting project for multiple offices at our facility. Zack was designated as the Project Manager and stayed on board for the full month and a half project.

Zack's management skills exceeded my expectations as did his determination to complete the project on time. One of the things that stands out in my mind was his first day on the job. He came in walking on crutches. With a smile on his face, he explained he had broken his leg while serving in the Marines OFS program.

At the beginning of each day, Zack would provide me with a status update on the previous day's work as well as what I could expect from the next day. This included an update on his plan of the next office to be painted, which also included when and where furniture would be move. He would then notify each staff member involved to limit any inconvenience he or she may experience during the project. It was always evident he was as concerned with not interrupting our daily activities as he was with completing the project on time.

This project was a complete success as well as a later project Zack was responsible for, a complete remodel of our office canteen.

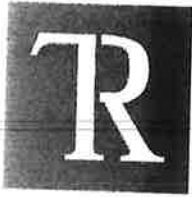
With the success of the above mentioned projects, I would gladly have Zack back on site to manage any future remodeling projects.

Kindest regards,

Janice M Garrett

CFO
Phenix Engineered Textiles, Inc.


EXHIBIT 9



LAW OFFICE OF
TYLER ROY

Tyler W. Roy
Attorney at Law
TN BPR #033514

FROM: Tyler W. Roy

RE: Zachary Hughes Bail

DATE: February 22, 2022

Dear Judge,

I am writing on behalf of Zachary Hughes. I have known Zack since 2017, when we met at a classical music performance at the Slovenian Consulate in Knoxville. Since I have known Zack to be a kind, considerate, and well-mannered person that has always put those around him before himself. He's the type of person who would give his coat to a stranger if they were cold. He has a strong sense of duty and of service to his community and country. He attempted to join the Marines and was only thwarted because of health issues as a result of training too hard.

Almost two years ago, my wife's host father, who was in his late 70s, was diagnosed with cancer. He took a turn for the worse, and when that happened, Zack immediately dropped everything and drove up from Greenville to visit him in the hospital. During another trip, he asked how he could help (he was always asking to help), and he spent the entire day with me cleaning windows at my house so that my wife would have a nice surprise when she got home.


Above all else, Zack is a man of his word and his trustworthiness and integrity are beyond reproach to me. If he says he will do something, he will do it. His word is his bond. If bail is set, I believe with absolute conviction that he would not be a flight risk, nor would he be a danger to the community.

I humbly request that you grant bond to Zack and do so at a reasonable rate.

Respectfully,

Tyler W. Roy

EXHIBIT 10



Mr. Mark Moyer
Moyer Law Firm, LLC
416 E. North Street
Greenville, SC 29601

Dear Mr. Moyer,

In response to your request for a statement about the character of Zachary Hughes, I am sending the following information.

I am Ann K. Holler, resident of Bristol, Tennessee. I have been a composer, private and college-level music educator, church choir member, and volunteer on behalf of the arts.

Zachary Hughes was a private piano student of mine from the years 2004 to about 2007. To say that he was my best piano student in all my years of teaching is an understatement. Even as he advanced to other teachers, I have followed his career, attended his performances, and stayed in touch with Zack and his family.

I remember Zack's first interview with me when he was about 12 years old, how nervous he was, and how well he played the Bach composition he had learned.

His progress was very swift, because of his love of music but also because of his high degree of self-motivation and his immersion into the world of classical music both inside and outside of the piano studio.

Integrity is an essential quality for a classical pianist, because "faking" a performance of a Beethoven sonata or a Liszt Hungarian Rhapsody is totally impossible. The same integrity that Zack brings to his music study and performance carries over into his personal life. The same faithfulness with which Zack approaches the composer's score is an essential characteristic of his overall personality. His musical honesty is not superficial. It comes from the center of his being.

A person cannot become a classical musician without high levels of self-sacrifice, self-control, drive, willpower, and optimism. These qualities are not manufactured in order to achieve musical success. Instead they must be part of a person's essential character.

In my personal experience with Zack, I have found him to be always dependable and trustworthy. As recently as early 2020 I invited him to stay overnight in my home, while he was in my town to perform Beethoven recitals. This invitation was extended without hesitation because of my personal knowledge of his character. He has been nurtured in the Christian faith from a young age, and he has remained true to that high standard.

Sincerely,

Ann K. Holler

EXHIBIT 11

To Whom It May Concern:

February 17, 2022

I first met Zachary Hughes when he won first prize at the Southeastern Piano Festival Arthur Fraser International Piano Competition in 2011, an event which I am the artistic director of. He went on to complete the Bachelor of Music degree at The Juilliard School and has since been working in the field of music as a concert pianist and freelance musician. He always undertakes challenging and large-scale projects and this latest project was to perform all 32 Beethoven Sonatas. He partnered with the Sigal Music Museum of Historical Instruments in Greenville to capture the Sonatas on both historical instruments and on modern pianos, side by side – a fascinating and worthy study.

Zachary is a considerate, intelligent, and focused person. I've known and worked with him since his teenage years and I have immense respect for both his rigorous intellect and impeccable musicianship. I cannot imagine Zack hurting anyone. He is a musician of uncommon gifts and abilities and a kind and respectful person. I do not believe in any way that he is a danger to the community and is not a flight risk, with family in Greenville with friends throughout South Carolina.

Please do not hesitate to contact me if you have any additional questions. My contact information is provided below.

Sincerely,



Dr. Marina Lomazov
Professor of Piano
Eastman School of Music
Artistic Director
Southeastern Piano Festival
University of South Carolina School of Music



EXHIBIT 12

To Whom it May Concern,

My name is Brian Shank and I am writing on behalf of Zack Hughes at the request of his lawyer Mr. Mark Moyer to give a statement about my personal knowledge of Zack to help ascertain understanding about his person. I am a composer and percussionist and employed by the Portland Symphony Orchestra in Maine as their Head Orchestral Librarian. Zack and I have been professional colleagues and close personal friends and since roughly 2011 when we were both enrolled at The Juilliard School.

I find it difficult to concisely summarize the breadth of experiences I have shared with him both artistically and personally, but I will try to say in a sentence that I know few people who steadfastly embody their commitment to their peers and loved ones, their belief in the spiritual significance and utility of Classical music, and their commitment to personal and spiritual growth - generally speaking their commitment to their moral code - as does Zack. We bonded quickly in school over our love of Classical music and in our Christian upbringing that we have sought to deepen and broaden our understanding of through philosophy, literature, poetry, and knowledge of other religions. Our seeking in art for things which express universal truths and experiences that have deep psychological significance has lead to a lasting and fulfilling relationship; I consider Zack one of the few people in my close circle for whom I would travel anywhere to visit.

It is true that among individuals inclined to express their life's meaning in art or music that "normalcy" is not a word one often hears in their description. Zack and I have both been acutely aware of this in our own selves and personalities coming from families who are not particularly artistically inclined or focused, however, it is clear to me that what many consider "abnormal" is the playing out of a devotion to the procurement and sustainment of an artistic craft at a particularly high level; this kind of dedication manifests as unusual to the onlooker, however, I have never considered either of us as dangerous or lacking ground. We have also shared many healthy conversations about the martial arts and military with both of us having close friends and family involved in both and we often likened our artistic training and regimental practice to a sort of military lifestyle. The training of the mind, body, and spirit is extremely similar, and performance science often looks at musicians and military members equally for this reason. Central to all of these practices is to understand the training as a way of taming one's instincts and shortcomings, understanding the responsibility you have to yourself and others, and understanding the power you can harness as a result - physically, in the case of any fight training, and spiritually in the case of the arts. The ancient Greeks knew this and would receive philosophy tutoring and training while they practiced wrestling and other sport. Zack and I would often talk about how the greatest balance we felt in ourselves was when the Apollonian (the arts/softness) and the Dionysian (the physical/hardness) were carefully balances and both honored. All this to say, Zack and I have worked together to shape our minds and bodies in ways which make us, hopefully, more productive members of our society, not dangerous or absorbent ones.

One year ago I was diagnosed with an extremely rare cancer called Dermatofibrosarcoma protuberans (DFSP), a particularly aggressive form of soft tissue cancer. As a young and healthy individual it was particularly disturbing and unexpected. The people I confided in I can count on a single hand - Zack was one of them. It was not because he was fun to be around or an admirable musician; all of that was of little importance. I spoke with him because I trusted his moral compass, his clarity of thought when it came to directing the mind and body towards positivity and healthy thinking, and that he was familiar with what it was to not know exactly where one's place was in the world and to accept that (where does a Classical musician *really* belong in today's world...?) and press forward with good intentions and love.

I would hope this brief testimony to Zack's character might absolve him from a concern as either a flight risk or a danger to his community.

With thanks for your time and consideration,

A handwritten signature in black ink, appearing to read "Brian Shank". The signature is fluid and cursive, with the first name "Brian" and the last name "Shank" written in a connected style.

Brian Shank

EXHIBIT 13

W Y C H E

Attorneys at Law

February 21, 2022

Presiding Circuit Judge
Court of General Sessions
Greenville County Courthouse

Re: Zachary David Hughes

Your Honor:

I write in support of the granting of bond for Zachary David Hughes pending trial.

I have known Mr. Hughes for nearly three years. For two years he lived with me and my wife in our home in Greenville, as a guest at our invitation, as we wished to provide some support to him as he continued to develop a career as a concert pianist. The letter submitted by my wife, Jeannette Anderson Winn, and those of my daughter and son-in-law, Eleanor and Alex Nordholm, provide some detail as to the circumstances of his residence in our home. I entirely agree with all the facts and opinions set forth in their letters.

Over the past three years I have come to know Zack very well indeed, first as an interesting and talented pianist, then as a young friend, and then as almost a member of our family as he lived with us in our home. I have spent many hours in Zack's company, and many more in his company with other members of our family and with friends of ours and friends of his. From that experience, I can say without qualification that I have an unshakable belief in Zack's character. It is a sign of that character that Zack returned to Greenville in the middle of preparing for a rewarding professional position as pianist in a classical quarter on a cruise ship, at a moment's notice and at some considerable expense, immediately upon hearing of the arrest warrant in this case. He turned himself in to the Sheriff's Office in Greenville. There was no attempt whatsoever to flee, even though that would have been an easy thing to do. He is here to face the charges and defend himself.

The strength of Zack's character is further borne out by his comportment during his confinement in the Greenville County Detention Center. Rather than lamenting his predicament, he has used the time to read serious literature and to compose music, even though he has no access to a piano or any other musical instrument. He has shared his books with his fellow inmates and has even composed a piano piece at the request of one of them, for that inmate's sister.

The charges brought against Zack are entirely inconsistent with his record and with his temperament. There is no evidence whatsoever that he would be a danger to the community were he to be released pending trial, nor that he would be a flight risk. My wife and I would be very happy to welcome him back into our home pending trial of his case. In addition to recognizing Zack's constitutional right to be presumed innocent until and unless proven guilty, his release on bond would enable him to continue to practice piano, compose music, and develop his career as a classical performing artist, in all of which efforts we will assist him.

Although it is not directly an issue in the decision to grant release on bond, I firmly believe in Zack's innocence.

I submit that Zachary Hughes should be released pending trial. He is not a danger to the community, and he is not a flight risk. He will be here for trial.

Yours respectfully,


Marshall Winn

EXHIBIT 14

Byeong Lee 'Patrick'

March 16, 2022

To Whom It May Concern:

My name is Byeong Lee and I am writing on behalf of Zachary Hughes. Mr. Hughes has taught my daughter, Olivia, piano lessons since September of 2020 until the end of October 2021 when he couldn't teach anymore due to preparation for a big performance on a World Cruise.

We met Zach while he was street performing his Beethoven piano sonatas beside Nose Dive in downtown Greenville where my son Payton and Olivia street perform regularly. We stopped and listened to his unmatched powerful piano playing and all of us immediately fell in love with his piano skills. After talking with Zach for a while, we discovered that we had mutual connections with Zach through other people. For instance, my son's girlfriend had used Zach as an accompanist on multiple occasions. Because of how talented and known Zach was, we decided to have my daughter take piano lessons from him. Zach has also helped my son Payton with accompaniments for all of his recordings.

Olivia started playing piano from the age of 2 and I can undoubtedly say that Zach is absolutely the most patient, gentle, and best teacher we have ever seen before. Everyone we have seen teach young kids has very little patience and easily gets mad but this is not the case for Zachary Hughes. Although we have only known Zach for about a year and a half, he has shown us time and time again how great of a musician and person he is.

From what I have seen online, this incident happened on October 15, 2021. Olivia's last lesson with Zach was on October 17, 2021 which means that her last lesson with him would have been two days after he allegedly committed this crime. I remember going to the lesson with my daughter and from what I saw, Zach acted completely normal as usual. His emotions were exactly how they have always been and the lesson was nothing out of the ordinary. From what I have seen in my life, people committing a crime like this are not calm at all, especially two days after it happened. Not only was this a major crime, but this is allegedly his first crime and I find it highly suspicious that he was able to act completely normal a couple days later which to me seem highly unlikely that this crime was committed by him.

Thank you, and please let me know if you have any questions.

Sincerely,



Byeong Lee

EXHIBIT 15

To the judge

My name is Claudio Olivera, and I am a Venezuelan concert pianist. I have been living in the United States since 2009, and I am currently Staff Accompanist and Adjunct Piano Faculty at the University of South Carolina, and Organist and Choirmaster at the Anglican Cathedral Church of the Epiphany in Columbia, South Carolina. I have known Zachary Hughes for several years, consider him to be one of my close friends, and can only attest to him being a good natured, honest and honorable man, kind and generous, with a great sense of humor, always willing to help others, a brilliant pianist and musician, and a very valuable member of the community.

I first met Zach in 2011, as I was working on my Doctorate in Music Performance at USC. I was part of the Young Jury for the Southeastern Piano Festival, and he was one of the competitors, eventually obtaining the First Prize. This led to him pursuing his piano studies at Julliard, so we really didn't get to know each other much until some years later, when he returned to South Carolina. At that point, he was looking for a place to live, so I offered for him to stay at my place until he could find somewhere else. He ended up staying with me for a few weeks. We bonded over music, videogames and movies, and very quickly I realized he was easy going, respectful and considerate, and someone I could completely trust without any reservations, so I wouldn't have minded it at all if he had stayed much longer. As a foreigner, it is not every day that I meet someone with whom it is possible to establish such a close and lasting friendship that transcends any cultural differences.

There have also been some occasions where I have needed his help, and he has always been there for me. I have stayed overnight at his family's house in Greenville a few times, so I have had the chance to meet his parents and brother, and I can only say they are all excellent people, a very warm, welcoming and kind hardworking family.

His most recent project was to record all of Beethoven Piano Sonatas. This is a truly daunting task that not many pianists are able to accomplish, and it would, without a doubt, have the potential to launch him into a very successful career. I witnessed the amount of work and time he dedicated to learning this music. In 2020, during the worst part of the pandemic, he performed many of these Sonatas publicly in parks and open spaces, without any remuneration, hauling a very heavy keyboard on his own, just for the joy of bringing Beethoven's music to the community during those difficult times. I truly believe that he is an artist that can only have a meaningful, positive impact to society.

Even though we have lived in different cities for a while, we always stayed in touch, and even if there are periods where we don't communicate as much, every time that we reconnect I am reminded that he is really a close, dear friend whom I deeply cherish and trust to the core. Four months ago, my wife and I welcomed our first son, and I simply cannot wait for the day where I can introduce him to Zach.

Please feel free to contact me if you require any additional information. I'm happy to provide anything that might help him in any way.

Sincerely,

Claudio Olivera

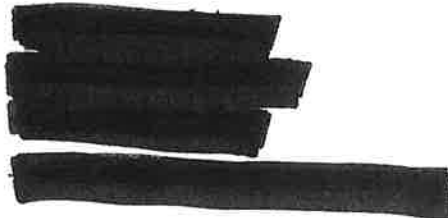
A black rectangular redaction box covering the signature and any handwritten notes or dates that might have been present.

EXHIBIT 16

Sarah Elizabeth Wokaty



February 21, 2022

To Whom it May Concern:

My name is Sarah Elizabeth Wokaty, a resident of South Carolina for 16 years, and a graduate of Clemson University. I have known Zachary Hughes for two and a half years as both a friend and a coworker. Zack and I met in July 2019 while working at Jianna, a reputable restaurant in downtown Greenville. Zack and I worked together, interacting on an almost daily basis. During that time, I observed his strong work ethic, his respectful and considerate attitude towards those around him, and his calm response under pressure. Zack was known by the entire restaurant staff as a hard worker and diligent server and was a valued and respected member of the workforce.

After Zack left that position, he and I remained in contact, and I came to know him not just as a coworker, but also as a friend, and as a man of discipline and character. Zack lives a disciplined lifestyle that he established during his education at The Julliard School in New York City. He would often forgo spending leisure time with friends in pursuit of piano practice, reading Dostoevsky and Rumi, and increasing his physical endurance. Zack strives to give of himself and his talents. From 2020 through 2021, he offered free piano concert performances of Beethoven's sonatas to the community. While attending these concerts, I observed how he would take the time to talk with attendees, showing kindness and thoughtfulness. Zack's goal was to better the lives of the members of our community through his music. Zack does not shirk responsibility and duty, these principles having been instilled during his military training at the USMC Officer Candidates School in Quantico, VA. Zack holds himself accountable and takes responsibility for his own actions. These examples of discipline and character testify to the fact that Zachary David Hughes is neither a flight risk, nor a danger to our community.

Thank you for taking your valuable time to read this letter, and I trust that you will carefully consider its contents. I remain available to confirm the facts of this letter as necessary.

Sincerely,



Sarah E Wokaty

EXHIBIT 17

February __, 2022

Alex W. Nordholm


Via Email

Greenville County Courthouse
305 E. North Street
Greenville, SC 29601

Your Honor,

I write to you in support of Zachary Hughes. I'm an attorney and business executive and have been a friend of Zack's for several years. As the son-in-law of Jeannette and Marshall Winn, I've even had the pleasure of living with Zack on two separate occasions, for several months during each stint.

While I admire Zack's talents as a pianist, such admiration has not informed my comments in this letter. While I'm in awe of his desire to serve his country as a Marine, such awe has not colored the impressions I hereby communicate to the Court. I know Zack through ordinary dinner table conversations, late night drinks around the fire, and the mundane and ordinary exercises of daily life. I've seen him when he's been "on" for performances or social gatherings, but much more often, I've been with him when he's been all the way "off" – his authentic self, if you will. My judgment of his character is, from that perspective, hard earned and deeply real.

And I can say definitively that Zack is the gentlest of spirits. He's soft-spoken, but with a laugh that can rise to boisterous. He's contemplative, smart, and serious, yet indulgent of the goofy and inane. And he's deeply attuned to the emotional and physical well-being of others. To consider him a physical danger to society simply doesn't accord with my experience. I've personally expressed that view through the trust I've placed in him with my immediate family. While living with the Winns, he spent endless hours alone with my in-laws, my wife and, later, my newborn son. I never questioned whether doing so was safe for my family, and I would not today. Quite the contrary, we've all benefitted from Zack's presence in our lives over the past several years.


I also know that Zack will be eager to confront the applicable charges before his peers. He is a man of principle and dignity, and I have no doubt that he will honor the judicial process. To be sure, doing so is essential to preserving and restoring his reputation.

I make none of these judgments lightly, but rather through the most sincere and sober examination of my dealings with Zack, as the matter before the Court requires.

Humbly yours,

Alex Nordholm

EXHIBIT 18



To whom it may concert:

It has been my privilege to know Zack Hughes. As a serious pianist, I was eager to meet this young musician. My first encounter came when he played a Beethoven sonata at the Greenville Unitarian Church. His performance was superb, but Zack, the man, impressed me even more.

Zack discussed his program in a way that broadened the understanding of novices and seasoned musicians alike. He was articulate and engaged with his audience. When I congratulated him after the recital, Zack was gracious and humble. In short, I was inspired not only by Zack the musician, but Zack the man.

I was fortunate to see Zack again when he traveled to my hometown, Athens. Once again I was amazed by the maturity of this young person. To achieve his level of keyboard mastery requires focus, determination and discipline that few of us have. To do so while retaining humility and curiosity is even more unusual. Zack has done both. He is both personable and professional.

Zack and I have communicated by mail during his time of incarceration. I have saved his letter. Why? Because it is one of the most thoughtful missives I have ever received. He has used his time in prison not to become bitter and angry, but instead to read the great philosophers, write piano compositions, and help other inmates in their own struggles,

that is, to continue to grow and treasure his days - even days in prison! I am simply amazed by his strength and maturity.

Do I think Zack poses a threat to society or a flight risk? No, I do not. My own belief is that we would be fortunate to have this wonderful human in our midst again.

Thank you for your consideration,
Sally Coenen

EXHIBIT 19

To whom it may concern,

I have known Zack Hughes since 2019. As a musician, he provided a music ministry in our church (the Greenville Unitarian Universalist Fellowship). I have had several informal conversations with him related to music. I attended every in-person performance he gave in his Beethoven concert series in our sanctuary and I attended a concert he gave at the home of mutual friends. I have been in his presence quite a number of times, and I've had several face-to-face conversations with him.

I have found Zack to be quite engaging and friendly, and easy to relate to. He is also very intelligent and brilliantly knowledgeable about Beethoven and his life and work. He willingly and elegantly shared that knowledge with his audience when he performed. It was clear he valued the connection he had with his audience as much as he did the sharing of beautiful music.

There is nothing in my interaction with Zack or from my observations of him that suggests any hint of him being a dangerous person. Quite the contrary; I believe he is kind and empathic.

I really can't comment about his being a flight risk. I know only of his connections in the Greenville/Upstate area, and he seems very stable emotionally and in his community.

I thank you for asking my opinion of Zack. I think very highly of the young man.

Sincerely,

Garnett Conaway, M. Ed.

Retired Marital and Family Therapist and Professional Counselor

EXHIBIT 20

Support Letter for Zack Hughes from Katrin and Georg Mattis

We are living in the USA in Greenville since 2019, as I have been contracted as General Manager by a German company, to build up the subsidiary for era-contact USA, create new jobs and grow the business.

My wife Katrin works as a language Coach, giving German classes at the German Day school Spartanburg and for Wetzel, a language company, providing also German classes for BMW employees.

First time we met Zack in mid-2019. When living in Greenville Downtown, we loved to visit the Restaurant Jianna on the weekends, where we received excellent service from a waiter, Zack Hughes.

As we have been served several times by Zack, we got in contact with him in a general small talk, however we realized quickly that Zack is a young man, who has great manners. With his passion for classical music and his recent trips to Europe we had instantly a very engaged and interesting discussion.

We exchanged email addresses to stay in contact and Zack invited us to a house concert in Janette and Marshall Winn's home, where he played the Beethoven sonatas.

This evening has been an exceptional experience for us, to see Zack playing the piano – Beethoven sonatas all by heart. We haven't been impressed only by Zacks professionalism how to play the piano and Beethoven, but by his appearance, his attitude, how to talk to people and feeling a honest and straight forward sincerity from Zack.

I am working in international sales and General Management for more than 30 years, worked with so many different people in so many different cultures. I hired in my career more than a couple of 100 new employees in different countries. So, my judgement on Zack is based on a broad foundation of experiences.

After the concert we stayed in contact with Zack, have joined several concerts and invited him several times for dinner in our appartement.

These evenings we do remember with great memories. Our discussions strived so many different topics all times. The reason, we do mention these evenings, you learn a lot of a person's character, when you have engaged, personal, emotional and so diverse discussions for many hours. It's very challenging for a

person to hide his real character in a situation like this or play a role which is not authentic.

Zack has a character which is based on great values, authentic behaviors combined with great respect for other human beings open minded, however able to express his thoughts and his own point of view. Zack is humble and never complains about challenging situations in life, he is and will stay a in our life as he enriched it for both of us! We have full trust in Zack and even in this so difficult situation Zack is in right now, he turns sad things in something positive where he can learn something out of it.

Whoever will have the chance to get in contact with Zack, will be inspired by his character. Last not least he has a great sense of humor.

Handwritten signatures of Katrin and Georg Mattis in cursive script.

Katrin & Georg Mattis, Greenville February 12, 2022

EXHIBIT 21



To whom it may concern,

We first met Zachary during the early summer of 2019 when he played the inaugural concert of our church's Bösendorfer grand piano. As interim choir director, Richard spoke with him briefly after the service that he attended on the morning of the concert. Zachary came across as kind, friendly and genuine person. The concert in the evening revealed that he was also an extremely talented and hard-working musician.

Later in the year, Zachary proposed to church that he present a year-long concert series highlighting all of the Beethoven piano sonatas. The work and skill required to perform such a feat is almost unimaginable. In order to make the concerts accessible to a widely diverse audience he specified that admission would be by a suggested, voluntary donation, and that any donations received would be divided equally between him and the church. This is a testament to his generosity.

He played three concerts before we were shut down by the pandemic. In order to complete his mission of memorizing and performing the Beethoven sonatas, he gave several free outdoor concerts, in addition to recording them at the Sigal Music Museum. We had the opportunity to talk with him after each of the outdoor concerts, and his final private performance at the mountain home of Jeannette and Marshall Winn. That was the last time we were able to interact with him in person, although we have corresponded with him once during his incarceration.

In spite of the fact that we have known Zachary for a limited amount of time, we view him as a kind, generous, personable, honest and a highly talented individual. We cannot think of any circumstances in

nighly talented individual. we cannot think of any circumstance in which he would be a flight risk or danger to the community.

Sincerely,

Richard and Hilary Nelson

--

Richard Nelson

EXHIBIT 22

To Whom it may concern:

I have known Zack since the Winns discovered him when they were looking for someone to play the inaugural concert on the new piano at the Greenville Unitarian Fellowship in June 2019. He soon became a familiar name in my friendship with the Winns. At that time he was working with his father. When Covid hit the Winns moved to their mountain house and Zack moved upstairs to their Greenville home so he could practice more easily and be closer to his part-time job at a restaurant downtown.

His idea was to play all of Beethoven's Sonatas during the 250th anniversary of Beethoven's birthday. There are 32 of them, and as a novice Beethoven lover, I never fully realized what an enormous challenge that was. As Covid began to keep us quarantined, and those of us who could work from home did, we spent time in the mountains. There we formed a sort of safe space with the Winns. Zack was part of that as he often came to the Winns' mountain house where we shared meals and listened to him practice. Zack became a good friend and a young man that I admired much.

We live in Athens, Georgia where people often have outdoor concerts. We felt we could have a safe, socially distanced and masked, outdoor concert and invited Zack to play on October 10, 2020. We invited friends and neighbors and everyone loved it. All this was legal in Georgia as we kept the numbers under 50.

I have spent many hours in Zack's company, he has eaten in my home, and has spent the night in my home. I have found him to be a kind, gentle, thoughtful young man and know he couldn't have done what he is accused of. He and I have written several letters during his imprisonment. He has endured this time with a sense of acceptance and a determination to make the best of it and hope for a good resolution. I could never believe he is a danger to the community or a flight risk.

Sincerely,
Lili Ouzts

EXHIBIT 23

Nicholas Luby
[REDACTED]
[REDACTED]

To Whom It May Concern,

My name is Nicholas Luby, and I am a pianist, educator, entrepreneur, and Co-Director of The Concert Truck, a mobile concert hall with a mission to make live musical performances accessible to communities around the country. I am aware that Zack has been charged with the murder of Christina Parcell.

I have known Zack Hughes for over ten years and in that time he has proven himself to be a dear, kind, loving, and supportive friend. We've been professional colleagues all of that time, and I have developed a deep respect and appreciation for his extraordinary musical talent, which he has always shared generously. In addition to spending summers together at music festivals since 2011, we were next door neighbors from 2016-2017 and spent many evenings together discussing life and music.

In addition to his work as a professional musician, Zack has worked part time in the food service industry for most of the time I've known him. From what I've witnessed personally and heard from colleagues and coworkers, he has an excellent work ethic and dedication to his work in service of others. He is humble and always willing to go above and beyond to help others however he can, whether by picking up extra shifts, giving extra piano lessons, or performing for/with other musicians and for listeners.

Over the last ten years I have come to know Zack as a beautiful and gentle soul. He is one of the most calm and emotionally grounded people I know. He has a powerful sense of right and wrong, stands firmly by his principles, and acts with great honesty and integrity at all times. I can testify that, to the extent of my knowledge, he has not and would never perform an act of violence or criminal misconduct. I have no reason to believe that under any circumstances he would be a danger to the community in any way.

I would urge the court to consider granting Zack bail so that he may continue his service to the community as a musician. I have the utmost confidence that Zack will honor the legal system and would not present a flight risk under any circumstances.

Sincerely,
Nicholas Luby

EXHIBIT 24

To whom it may concern,

My name is Jean-Marie ("John") E. Mille. I am an attorney residing in Columbia SC. I am writing this letter for the benefit of Zachary Hughes and in support of his Motion to set bond for his release from incarceration, pending his trial.

I do not believe that Mr. Hughes presents a risk to the community or is a flight risk.

I have come to know Mr. Hughes through longstanding friends, Jeannette and Marshall Winn, who let my wife and me know about a young pianist that they had discovered and who would give a free concert at the Greenville Unitarian Universalist Fellowship. This was some time in mid 2019. After attending the concert, I met Mr. Hughes in the concert hall and at a reception in his honor afterwards in a private home. The performance was stellar and I was particularly appreciative of Mr. Hughes's custom to deliver- before each piece he played- a short introduction in which he would offer the contextual skinny on the music and the composer's frame of mind at the time of its composition. I found him to have an easy-going personality, devoid of pretense, and to be very community-minded- certainly not a risk to it. His project of performing all of Beethoven's sonatas- 32 altogether, I believe- sounded overly ambitious as a commitment, which he did achieve, to my amazement. A Beethoven Odyssey, he named the project. An odyssey indeed. And an outstanding boost to all the persons in attendance and a precious asset to the community at large as well.

Since that first concert, I attended two more of his concerts, in February 2020 and in early October 2021 respectively. Each performance was an attestation to Mr. Hughes's talent as a virtuoso pianist. On several other occasions, I was in the presence of Mr. Hughes in private homes with groups of friends where we socialized. Mr. Hughes also stayed overnight at a friend's house where we were both guests. I am not familiar with any of the details surrounding his arrest, but I find the facts that he is accused of to be totally out of character with the Mr. Hughes I know.

I would, therefore, urge the Court to give Mr. Hughes the full benefit of his constitutional right to be deemed innocent until proven otherwise, and to let him be again a productive member of his community rather than pining away in a detention center. As he showed before, by turning himself in, he will not ignore the law, but continue to believe in justice.

Thank you for taking the time to consider my plea.

With warm wishes and due respect, I am

Yours truly

Jean-Marie E. Mille

February 14, 2022

EXHIBIT 25

To Whom this May Concern:

I write this letter with the faith that it will shed some light on the character of my friend, Zachary Hughes.

As a close friend of Zack's for many years, and having had the chance to see how he carries himself throughout the different experiences that life brings upon one, I would confidently say that Zack is neither a danger to the community nor a flight risk. I have always known him to be a caring and sympathetic person of high moral ground.

We met in 2012 while both students at Juilliard, a school as much known for its prestige and fantastic teachers as it is for its competitive environment that can leave some students grappling for a hold as we learn simultaneously how to navigate our personal and artistic lives as young adults in New York.

In the summer of 2013 we both attended the Fontainebleau School of Music and Fine Arts, a month-long academy which takes place just outside of Paris. Often musicians who perform together may grow close over cherished memories created onstage, and while we enjoyed sharing the stage together in various concerts, our friendship first grew from a more unusual circumstance that took place during this academy in the summer of 2013. During this academy there was a world-renowned musician with whom I was performing and who was in a directing position at the time. For professional reasons I will leave him unnamed. He was much older than me (in his late 70s) and as far as I know, married, and during that month he made a habit of using his position of power to abuse the situation with me, including inappropriate sexual advances that left me, at the time barely 22 years old and a student, feeling paralyzed with uncertainty as to how to react, not to mention very uncomfortable. I was embarrassed and afraid to speak up about it, but this isn't something one can keep in easily. Zack noticed that something was up, and eventually he became my confidant - he simply gave me a safe space to talk about whatever it was I needed to get off my chest.

That was just the start of our friendship. Besides music and the circle of close friends at Juilliard that we both shared, we also grew close through shared interests and circumstances: we both delved into the world of writing poetry and prose as we discovered this new artistic form of expression different from our profession as musicians, we both signed up for the year-long Gluck Fellowship program through Juilliard for the 2014-2015 school year which meant we spent many an hour trekking to farout parts of New York together to give concerts in various hospitals, mental wards, and retirement homes, and at one point we were both also in long distance relationships with people who lived in Paris while we were still in New York and so could easily commiserate on the ups and downs that that kind of situation can naturally have.

If I were to describe Zack in a few words it would be: loyal friend, strong sense of what is morally right and wrong, a big heart for defending those he is close to from harm, and a very patient

listener. Zack is someone who, and I write from experience, will drop everything to spend a rainy Sunday playing pool with you to cheer you up when you're down, he'll be there at the end of the night to help you sort out a 400 dollar tab at a post-concert restaurant dinner because too many people left early without paying, he'll hop on the train for 40 minutes to rush over to your apartment and then call the ambulance for you because you are too sick to do it yourself, he'll tell you honestly yet tactfully what he thinks about something no matter how delicate the topic... the list goes on.

Since I moved to Paris in 2015, Zack and I have remained close despite the distance. Having shared many a fun time together - be it on vacation with friends in Barcelona, or making music onstage - regardless of how long it had been since the last phone call, we would always reconnect again with ease.

Over the years, Zack has become a brother to me. Knowing him for all these years as a caring person with a strong moral compass, I was in shock to hear of the recent news of his current situation. I hope this letter will prove helpful in shedding some light, and I remain at your disposition to answer questions.

Sincerely,

Rachel Koblyakov

EXHIBIT 26

To whom it may concern,

My name is John Holloway and I am the founder and executive director of Vivace Music Foundation and the executive director of the Seattle Chamber Music Society.

I have had the great pleasure of knowing Zachary Hughes for nearly 15 years. I first met Zack when he was in high school. He was a prodigious talent and we shared the same piano teacher. We performed together in recitals, spent time together at concerts and receptions, and I became a huge fan of his as a friend and musician. We moved to different cities and became even closer; speaking on the phone weekly and visiting each other as often as possible in different cities, including Columbia (SC), New York and Kansas City.

I have never known Zack to be violent and am shocked that he is being charged with murder. He understands people from all walks of life and finds a way to connect with everyone on an intimate and personal level. He is a masterful artist, but an even better friend. He has friends and connections from every sphere, is a God-fearing man and creates art to make the world a better place. Without reservation, I can confidently state that Zack is not a danger to anyone.

Zack is also a man of his word. He holds himself to strict schedules and routines to better himself and those around him, is able to focus and maintain discipline unlike anyone I know and always holds himself accountable – whether that is in the practice room or on the phone with a friend in need. He is an outstanding colleague and mentor to many. Zack simply makes the world a better place. If he receives bail, he will undoubtedly fulfill his obligations to appear in court and he will honorably defend himself and fight for his freedom in a court of law. That's who Zack is and his commitment to accountability is what defines his personality the most.

When Zack was arrested for this crime, I received many messages and calls from our circle of friends. Everyone I communicated with was shocked beyond belief. We all know Zack isn't violent, but there has never been the slightest suggestion that he is capable of physically harming someone. When I have experienced Zack in a situation of conflict, he responds with words – eloquent words deescalating tension, solving problems and intellectually resolving conflict – and always with accountability for his own actions.

I am grateful you have taken the time to read this letter and remain available to speak further about my interactions with Zachary Hughes.

John Holloway


EXHIBIT 27

[REDACTED]

Presiding Circuit Judge
Court of General Sessions
Greenville County Courthouse

Re: Zachary David Hughes

Your Honor:

I write to you in support of Zachary David Hughes and ask that you grant his release on bond pending trial. I strongly believe that he is neither a threat to the community nor in any way a flight risk.

I am a member of the South Carolina Bar and the Greenville County Bar Association.

Zack lived with me and my husband, Marshall Winn, for two years, beginning in October 2019 until October 2021. We met Zack in the spring of 2019 when the Greenville Unitarian Universalist Fellowship ("GUUF") where we are members, received the gift of a concert grand Bösendorfer piano. We selected Zack, from a number of excellent pianists, to play an inaugural concert in June 2019. In the course of his preparation, we invited him to come practice on our piano in our home, which he began doing in the evenings after he finished working with his father painting houses. We got to know him during conversations after his practice sessions and when he occasionally stayed for dinner with us.

It was during this time, late spring 2019, that Zack proposed the idea of performing all 32 Beethoven piano sonatas in 13 concerts at GUUF during 2020, an incredibly ambitious undertaking, particularly in that timetable. In the fall of 2019, he was practicing regularly at our house, working at Jianna's waiting tables, and driving to and from his parents' home in Travelers Rest. We invited Zack to stay in our upstairs so he could practice more easily, and he lived with us for two years, until he left to take a job with a classical piano quartet on a cruise ship.

Zack was an absolute delight to have living in the house with us. Not only were we treated to the immense pleasure of hearing him practice, but we discovered that he was a fascinating, disciplined, personable, and extremely considerate guest in our home, and we soon came to view him as a member of our family. Our daughter Eleanor and her husband, Alex Nordholm, got to know Zack well and lived with us and Zack during the summer of 2020 and again, along with their infant son, in the fall of 2021 when they were doing renovations on their house. They share our enormous respect, admiration, and support of Zack.

Your Honor, I can assure you that if I ever had an inkling of Zack's doing harm to another person, we would NOT have allowed him to continue living in our home. That is simply not in character with the person we have come to know well and love. Zack is one of the kindest and most thoughtful and honorable persons I have ever encountered. He is also very responsible: when the arrest warrant was issued, he immediately abandoned his plans for the cruise ship job and rented a car to drive back to Greenville and turn himself in so that he could clear his name and his reputation. For those of us who know Zack, that allegation simply does not square with his character.

Even while incarcerated in the detention center, Zack has shown grace and integrity. He is making the best of his situation and spends his time reading, writing letters, and composing music. He has lent books to his fellow inmates and even composed some music for one who asked him to write something for his sister.

My husband Marshall and I would be honored and happy to host Zack once again in our home if he can be released on bond pending trial. We sincerely urge you to do that.

Respectfully,



Jeannette Anderson Winn

EXHIBIT 28

W Y C H E

Attorneys at Law

February 17, 2022

Eleanor Winn Nordholm

[REDACTED]
Presiding Judge, Court of General Sessions
Greenville County Courthouse
305 E. North Street
Greenville, SC 29601

Your Honor,

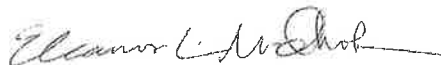
I write to you in support of Zachary David Hughes. Zack has lived with my parents, Jeannette and Marshall Winn, for two years, and I consider Zack a member of our family. This feeling was reinforced after living with my parents and Zack for two 2-month stents while my husband and I were house hunting and then renovating. I am sure that I will not be the first one to write to you about Zack's incredible talent. I could fill many pages describing how his dedication to his craft and has inspired me to be more mindful and intentional in my daily life – whether in my legal practice at the Wyche firm, or as a new mother to my seven-month-old son, August.

When my parents first told me that a young concert pianist/former Marine officer candidate was going to be living with them in their home, I was a bit skeptical. A bit of background is necessary: I am a former Bronx County Assistant District Attorney in the Investigations division – being skeptical about an unusual situation was what I did for a living. So, I did what I was trained to do: I asked a lot of questions to learn more about who Zack was and how he came into my parents' lives. Here is what I discovered:

Zack is perhaps the most extraordinary person I have ever met, because many of his qualities appear to be contradictory. He can be incredibly focused on his work, but is also easy going and fun. While I was working from my parents' home in the early days of the pandemic, Zack would spend hours at a time at the piano, practicing the same measures of a complex Beethoven sonata over and over until he had them memorized and could perform them flawlessly. At the same time, he would sprinkle in silly improvisations – like sightreading the Jurassic Park theme song after we watched the movie the night before. We would have conversations over dinner that ranged from debating religious philosophy to laughing over a Saturday Night Live skit. However, there are a few qualities about Zack's personality that are steadfast – he is kind, gentle, and, above all, is a person of integrity.

During my time in the Bronx DA's office, I represented the state of New York in countless bail hearings. I came across many defendants who had significant criminal histories, including bench warrants for failing to appear. I also came across several defendants who were arrested for additional crimes while out on bail. I can say wholeheartedly this will not happen with Zack. Zack is not a flight risk, nor does he pose any danger to society. He is a person who takes pride in honoring his commitments and staying true to his word. I implore you to release Zack on bond. I have no doubt that Zack's focus is on preparing for his right to have his day in court to restore his good name and reputation.

Very truly yours,



Eleanor Winn Nordholm

EXHIBIT 29

February 12, 2022


Re: Zachary Hughes

I write to convey my sincere belief that Zachary Hughes is in no way a danger to the community, or a flight risk, should he be granted a bond. The charge against Zack defies my belief of who he is and is revolting to me. It reflects an assailant completely opposite from the gentle, sensitive, funny, and humane person I've come to know in Zachary Hughes over the last several years. I cannot even force myself to imagine him committing violence against another. It simply won't compute. Zack is intelligent and gifted, patient and kind, and he has shown me values that in no way comport with the allegations against him. So, could he be a danger to the community? Absolutely not. And does he pose a flight risk? I cannot imagine how: this is a young man who turned himself in for the simple reason that he was asked to by authorities, not because he was guilty. The very fact that he complied made some readers of the news assume he must be guilty. No: he is cooperative and principled. He has tried to make the best of his time in prison, for himself and his fellow inmates, confident that the truth will come out.

I have known Zack since attending his magnificent concert to celebrate a special piano acquired by the Greenville Unitarian Universalist Fellowship on June 9, 2019. Afterwards, friends gathered at the home of those who sponsored the event, Jeannette and Marshall Winn, to meet the donor of the piano, and ultimately to meet and get to know the young pianist, Zack. I had been prepared for what I would experience, as the Winns had come to know him, and they are among our closest friends since graduate school, 47 years ago. When Zack arrived at the post-concert gathering, I had an opportunity to engage in long conversation with him, during which I learned his own thoughts on his life leading up to this evening, and his ambition with his music. I found him thoroughly engaging and humble, surprising after such a stunning piano concert, complete with short profiles he had offered prior to performing each composition. He had prepared the audience to look for certain emotional contours in each piece, so that we could better appreciate what was intended. Zack would later launch a "Beethoven Odyssey," in January 2020: 13 concerts throughout the year, celebrating Beethoven's 250th birthday, again with detailed insights into each composition before performing it.

That weekend in June 2019 was the first of a number of weekends we spent in Zack's company with the Winns, in Greenville or in the mountains, cooking, hiking, and playing music together. Zack met our son and daughter-in-law on one such weekend, and immediately hit it off – our son is a professional cellist. We improvised at the mountain home with all our instruments to make music together. When Zack's friend from Juilliard visited him, he took him to see Charleston and they stayed with my son and his wife. They formed a friendship and enjoyed each other's company and defend him to this day.

We went from Columbia to Greenville for the third concert in Zack's Beethoven series, in February 2020. It may have been at that concert at the GUUF, that we met Zack's parents. But with the pandemic, we had to see the remaining concerts virtually, instead of in person. He never disappointed. Our last visit with him was in the first weekend of October 2021, back at the Winns' mountain house, where he performed for some 60 (vaccinated and masked) guests another stunning concert of Beethoven's work, wrapping up his series for a live audience that was extremely appreciative and moved by the performance. We socialized afterwards, and when the guests had left, we cooked and ate together and talked late into the night.

We were dismayed, devastated, and shocked when we saw in the press that Zack was charged with a violent crime committed eleven days after that concert...and not just charged but declared guilty by the sheriff. It has been a nightmare for all of us who know and love Zachary Hughes. We wait patiently, as does he, for justice to prevail. We trust that he will ultimately be exonerated and begin the work of putting his life back together.

Thank you for reading this.

Katherine Wyly Mille, PhD

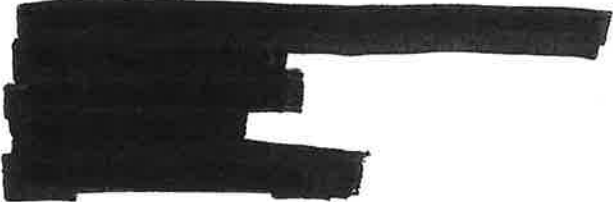
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EXHIBIT 30

February 16, 2022

To whom it may concern:

Zachary Hughes has been nothing other than a friend, a colleague to me, and an extremely valuable asset to the community. My wife Arlene and I officially met Zach in 2019, introduced by our close family friends, the Winns. We have enjoyed a close and growing friendship ever since. With my background as a professional cellist/entrepreneur, wine enthusiast and lover of the occasional dirty joke, Zach and I share many things in common, and our friendship is effortless. In no way do I think that he would do harm to another person, quite the opposite in fact. I also see no potential of flight risk. Zach has always been a gentleman, in all respects, and the fact that he turned himself in is no surprise. I would have done exactly the same.

What I admire most about Zach is his dedication and commitment to achieve unthinkable goals on the piano and through his interactions with the community, presenting performances of a caliber seldom seen in South Carolina's classical landscape. There was no concert organization backing him up with marketing campaigns etcetera. Zach's feats are a result of grassroots support, which involves a much more down to earth approach, one of personal interaction and humanity. His success is built on hard work and principles, and I feel that this is one of the first things patrons notice upon shaking hands with him following his concerts.

In the three years we've all been friends of Zach's, we've hosted him in our Charleston home, along with his former Julliard colleague. We've spent several weekends together at the Winn's mountain house, as well. I've even hired him as a soloist through my company, Charleston Entertainment, where he performed for a wedding reception.

As a responsible citizen, I see no reason for Zach not to be released, pending further investigation. He's a model individual and we look forward to being able to benefit from his presence, hopefully soon.



Andrew Mille
Owner and Cellist
Charleston Entertainment LLC



EXHIBIT 31

March 6, 2022

Your Honor,

I write this letter in support of granting a bail bond for Zack Hughes. I have known him for about two years which, on the surface, seems a relatively short time to assess the character of an individual. In this case, however, I feel I had enough quality time with him to understand enough of him as a person to make such a judgement. I met Zack at our Fellowship as he was putting on a series of classical piano concerts there, and I was so impressed with his talent that I made to point of getting to know him on a personal level. Through the many, and various, conversations I had with him, I found him to be intellectually smart and well grounded. His demeanor was always polite and respectful. Quite frankly, he was a joy to be around as he was always jovial. I truly feel that he would not be a flight risk as he had settled here in Greenville and developed a reputation as an outstanding professional piano player in our community. His community is now Greenville, and I believe he will stay right here to see this whole process come to an end.

I was completely shocked when I heard of his arrest and could not believe that he had been accused of such a crime. I immediately thought that a terrible mistake had been made as the Zach I had grown to know on a level beyond music was just not the sort of person who would, or even could, do such a thing.

I understand he has been a model prisoner during his incarceration which should speak well of his character. I communicated with him by mail and received correspondence from him. He never complained to me about his current situation, and he impressed me with a stable routine he has developed and to which he has become accustomed. I feel he would do the same if he is granted bond.

Respectfully Submitted,

Bill Schulze

A blacked-out redaction covering the signature area, consisting of two horizontal bars.

EXHIBIT 32

Feb 19, 2022

To: Mr. Mark Moyer / Moyer Law Firm, LLC

Re: Zachary Hughes

My name is Arlene Felipe, and I am a friend and supporter of Zack Hughes. I met Zack in ~2019, through dear family friends on my husband's side. Our friends, the Winns, basically watched my husband grow up, and Marshall Winn officiated our Wedding in France. The Winns had been hosting this talented and ambitious pianist and were hopeful that my husband, Andrew, and I could come up to Greenville to meet Zack and attend one of his concerts. We'd had a bunch in common: trained artists under 40 years old, mutual friends of the (wonderful) Winns, with a love of classical music, travel, good food, wine, and jokes..!

We came up for one of Zack's Beethoven Sonata concerts at the Unitarian Church in Greenville. Post-concert, we all stayed at the Winns' home. Together with my husband, Zack and Andrew had a special place in their hearts for a good laugh – a nice balance amongst the reputation of classical music performance! We all became instant friends. We've even hosted Zack twice at our home in Charleston, SC. He stayed over once to play piano for a Wedding nearby; and a second time, he and a Julliard friend of his stayed over as they toured the city. Andrew and I were very happy and comfortable hosting these kindred spirits.

I continue to be shocked to hear that Zack is being tied to a case such as this. I cannot fathom considering him to be any danger to the community. I find him to be quite mature, driven, composed, and wise beyond his years. As I've served as a former adjunct professor and mentor for a middle-school student, I remember thinking that he would be such a great role model for young individuals. Being young himself, he is relatable, warm and kind, humble, has a good sense of humor, is a good listener, interested in how to optimize our lives and health, and with great stories to tell from a variety of life and educational experiences. I also cannot fathom him being a flight risk, as I believe him to be an intelligent, reasonable, rational, lawful and honest person. He is an individual who comprehends the severity and complexity of any situation, and would take any requests and requirements seriously while all of this clears. I believe he would even stop to ask and clarify that he understands all the terms, to not inadvertently mess anything up!

I arrive at these conclusions of character about Zach because in our conversations, he is a fellow appreciator of self-awareness, self-discipline, and just trying to reach our fullest potential. A few examples: He's a fellow fan and admirer of Wim Hof, a leader in physical- and mental-fitness; and Zack initiated and self-created his Beethoven Odyssey project – memorizing and performing

32 Sonatas while also relating the story of the famed composer at each performance, giving context to help the public connect to the story behind both the music and composer. I believe these qualities show his sensitivity to the arts, his own talents, and with people, as well as a willingness to connect and share with others.

We - myself, my husband, our families and friends - along with Zack, all wait patiently for clarity, justice, goodness, and truth to win out in the end.

Thanks for your time and consideration.



Arlene Felipe Mille

MFA in Theatre - Costume Design

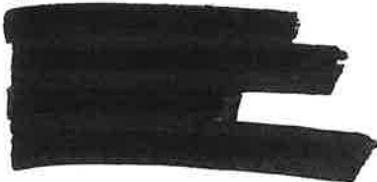


EXHIBIT 33

February 23, 2022

To the Court in the case of Zachary Hughes,

I first met Zack in mid to late 2019 after his recital at the Unitarian Universalist Fellowship in Greenville. My husband and I had a short conversation with Zack, and I was impressed with how open, gracious, and intelligent he is.

Since that time, I have had several conversations with him either after other performances or at the home of mutual friends, and we have spoken about many topics including his musicianship, his love of Beethoven, his education and musical training, his plans for the future, the support he has received in Greenville, and his desire to make Greenville his home.

I have always been impressed at Zack's intelligence, gentleness, and thoughtfulness. I do not believe he is in any way a danger to the community where he feels so much support and love. Nor do I believe that he would be tempted to flee if released on bond because he has that support and because he has shown that he is a responsible young man by turning himself in to the authorities rather than waiting to be arrested or fleeing to avoid arrest.

I hope that the Court will allow Zachary to post bond and prepare for trial surrounded by his friends and supporters.

Thank you for your consideration.

Respectfully,
Helen Graben

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EXHIBIT 34



Greenville County Court of General Sessions

Re: Motion for Bond for Zachary Hughes

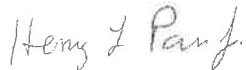
Dear Judge,

This letter is in support of Zack Hughes request for bond. I met Zack at one of the many concerts he has performed here in Greenville while living at the home of my close friends Marshall and Jeanette Winn. I have followed him and his career fairly closely for several years.

I know Zack to be an earnest, faithful, honest, reliable citizen. I was not surprised to see that he came back to Greenville and turned himself in voluntarily when he learned of the warrant for his arrest. I would be surprised, however, if he did anything other than comply with the conditions of his release on bond and stay here to defend himself against the charges against him. I would be even more surprised if he ever did anything that would harm anyone. I know that he has lived at my friends home for a long time, that they have trusted him in that way, and that he has not betrayed their trust.

I urge you to grant his request for release on bond.

Sincerely,



Henry L. Parr, Jr. attorney SC Bar # 4340

EXHIBIT 35

To whom it may concern.

I met Zack in 2011 at the Juilliard School of Music. He was studying piano and I was studying composition. What struck me the most when we first met was not only his deep kindness and great ability to laugh and make laugh, but also his profound and rare interest for the core of musical grammar, as well as for new music.

In 2013 and then in 2015, he played my piano Sonata in a way that very few performers have: that is, with a profound intelligence and generosity. One can find a link of these performances on YouTube. At the end of one of the videos of the 3rd movement, I go onstage to embrace Zack: <https://www.youtube.com/watch?v=-M1C179faBdY>

This was one of the most amazing moments of my professional life. I felt so grateful.

Since then, I live in Paris but Zack and I kept talking on the phone regularly. He came to see me several times and we always had a blast.

The idea that Zack could be a danger for the community is absurd to me, as well as to anyone who has known him closely or even just professionally. More than that, I want to say that since I met him, my life has become more interesting and more alive. This is what Zack usually generates.

If I can be of any additional help in the course of this investigation, please let me know.

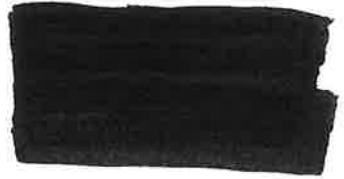
Sincerely,

Jules Matton

EXHIBIT 36

February 26, 2022

Eric K. Graben



By electronic mail:



RE: Zachary David Hughes

Dear Mark:

I writing to you to support a motion to grant bond to Zachary David Hughes, who has been charged by the Greenville County Sheriff's Office with the murder of Christina Larain Parcell.

I was completely shocked to hear that Zach had been charged with such a crime and find it highly unlikely that he would commit such a crime. I do not know Zach well; however, I have had the pleasure of meeting him several times at piano concerts at the Greenville Universalist Unitarian Church and at the home of my good friend and law partner Marshall Winn, where Zach has performed Beethoven sonatas (and performed them exceedingly well). He has always presented as polite, friendly, reserved, kind and utterly non-threatening. It seems to me highly implausible that he would be a danger to the Greenville community if he were released on bond or that he would be any significant flight risk. I very much hope that the court will grant him a reasonable bond and that he will be released promptly. If there is more I can do or say to support your motion for a bond on Zach's behalf, please let me know.

Sincerely,

A handwritten signature in cursive script that reads "Eric K. Graben".

Eric K. Graben

EXHIBIT 37

I first met Zack Hughes two years ago, at our church. He had just given a Beethoven concert on the church's recently donated Bosendorfer piano. To say I was impressed by his passion for his work as well as his obvious talent would be an understatement. I have had contact with him in person, by email and by letter since that time. Even in his present, difficult circumstances he demonstrates an ability to center himself, particularly with reading and composing, two of his great interests.

The possibility that Zack could endanger anyone is simply unfathomable to me. What has struck me most in the time I've known him is his humility, sense of humor and intellect. Those things are only superseded by his obvious passion for his music, and why he would leave the community, when he has so much to gain by staying, again, is inconceivable to me.

That is the Zack Hughes I know.

Maureen Nery

Maureen Nery

EXHIBIT 38

My wife Miki and I have known Zack for almost three years.

I met him under professional circumstances, since I am a piano technician. We also have mutual friends. I tuned and maintained the pianos Zack was working with. He always invited us to his concerts, which were basically free for the community.

Over time I developed a personal relationship with him. Zack came to our home multiple times for various reasons, mainly as a friend of mine and Miki's. Zack and I share some hobbies and we spent time enjoying those as well. He even volunteered to help me with some piano work.

I consider Zack to be a straight forward, honest, responsible, and principled man.

In no way do I think of him as dangerous to anyone, or someone who would run away under challenging circumstances. He always struck me as a person with enough courage to face reality.

Sincerely,

Alon Ratoush

EXHIBIT 39

Dear Mark

My wife and I have known Zack for a couple of years. We have had meals with him and the Winn's on multiple occasions and he has visited our home and has spent the night with us. He has always been gentle and professional.

I would consider the fact that Zack turned himself in when he could have fled to be evidence that he is not a risk for breaking bond.

Also his entire life and career dreams of becoming a famous musician depends on resolution of these charges. I think breaking bond is not an option for him.

Respectfully

Harvey Ouzts MD

EXHIBIT 40

To whom it may concern:

I have known Zachary Hughes for more than ten years. While I do not have any information pertaining to the allegations, I can confirm that I have, throughout the years I have known Zach, never had any concern as to his character or motives whatsoever. He has been a trusted friend, always wanting to do the right thing, believer in the positive difference music can make on the world, and a true intellectual. I do not believe that he is a danger to the community or a flight risk in any way.

I have gotten to know Zach very well, having met in college, and spend time together on vacations, such as hiking trips in Europe, on the stage for classical concerts, as well as personal events, such as my wedding. If there was one thing that was always true throughout this time, it is that he kept his word and one can trust it. I do believe that this has not changed and he will follow the proceedings in every way as required.

Sincerely,
Robin Giesbrecht

EXHIBIT 41

Dear Mr. Moyer,

Thank you for your efforts on behalf of Zack Hughes. My late husband, David Freeman, spent over 65 years practicing law in South Carolina. I hope your career gives you the deep satisfaction he enjoyed.

One of his partners at the Wyche firm was Marshall Winn. My support of your client, Zack, depends largely on my confidence in the integrity and sound judgment of Marshall and his wife, Jeannette, whose acquaintance with Zack was daily over a period of several years. My personal association with Zack has been primarily as an appreciative member of the audience when he performed at the piano, and through brief social exchanges at the Winns' home or at the Greenville Unitarian Universalist Fellowship, which sponsored some of Zack's concerts. Although not myself a member of that congregation, I have several close friends who are. Their high regard for Zack has contributed to my opinion of him. So, in a sense, my evidence as to Zack's character is hearsay.

I am prepared, however, to state that I believe he should be released on bond while awaiting trial. The very nature of the crime, for which he has been held for months without being charged, makes it highly unlikely that his freedom would constitute a public danger. The risk is, in fact, statistically infinitesimal.

I am also of the opinion that his high regard for the Winns and others in the Greenville community who have supported his career, both before and after his arrest, makes it most unlikely that he would betray these people by attempting to flee this jurisdiction. Certainly none of his supporters or his family would aid or encourage such action.

The greater danger to the community, as I see it, is the erosion of confidence that we citizens experience when our system of criminal justice fails to honor the principles of presumptive innocence and habeas corpus. Justice delayed is always justice denied, and in the case of young musicians, held for months without bail and denied access to the tools of their trade, such incarceration constitutes an unusual burden of punishment.

I look forward to being of whatever help to your client that you might suggest.

Sincerely,

Keller Cushing Freeman

February 13, 2022

EXHIBIT 42

I am writing in support of Zachary Hughes. I have known Zack for ten years. He was a student of mine at the Juilliard School in NYC. What I can say is Zack never let his heavy workload and its attendant stress get the better of him. He never exhibited disruptive behavior in class, never got into arguments with other students. Zack was a softspoken easygoing young man. He was intensely focused as a student. We have stayed in touch since that time. We meet for drinks whenever he's in NYC for work or a concert. Over the years I have seen him grow even more focused than he was as a student. I cannot imagine what could have transformed Zack from the man I have known for a decade into someone who has had such charges levelled at him. I can't imagine it, and I don't believe it.

Ron Price

EXHIBIT 43

From: JEROME LOWENTHAL

[REDACTED]

To Whom it may Concern

Zack Hughes was my student for several years at the demanding piano program of The Juilliard School.

His work was exemplary and on the highest level. As a student, he was extremely responsive and in his behavior as a person he was friendly and cooperative, both with me and with the other students. I never had any reason to question his integrity or reliability.

Jerome Lowenthal, Piano Faculty, The Juilliard School

EXHIBIT 44

Savannah King



March 1, 2022

RE: Zachary Hughes

To The Honorable Judge

I am writing in support of Zachary Hughes and his bond hearing. I am a nanny to a grandchild of Jeannette and Marshall Winn. I met Zach around September 1, 2021, when the child's family was staying with Jeannette and Marshall, with who Zach lived.

When I worked at the house, I got to know and befriend Zach. There were many days that Zach and I spent together in the home. Zach is a very kind and considerate person who always offers a helping hand. He is the first to greet you or ask about your day. I would argue that Zach is one of the kindest people I have met.

Zach has a strong support system and I do not believe that he is a flight risk or a risk to the community.

Sincerely,

A handwritten signature in black ink, appearing to be 'S. King'.

Savannah King

EXHIBIT 45

February 13, 2022

To Whom It May Concern,

I have known Zachary Hughes for approximately 11 years as the Director of the Southeastern Piano Festival, as Zachary's private piano teacher and for the past several years as a friend. Zack first attended the Southeastern Piano Festival in 2011, where he won First Prize in the Arthur Fraser International Piano Competition and subsequently performed as soloist with the South Carolina Philharmonic Orchestra.

Zack went on to study at Juilliard for the Bachelor of Music degree in piano performance and later returned to South Carolina where I was his private teacher periodically for about 1 year. He has also returned to perform and assist with the Southeastern Piano Festival on several occasions. Zack is a kind and helpful person that cares deeply about each person that he meets and works with. He is a highly valued member of the South Carolina arts community and has been invaluable as a performer, volunteer, and friend of many throughout South Carolina. He is not a danger to the community or a flight risk, having no criminal record and close ties to family, friends, and numerous organizations throughout the state.

As a teacher, friend, and colleague of Zack for 11 years, I have no doubt that he poses no danger to the community and strongly believe that he should be granted bond in his current legal matter.

Sincerely,

Joseph Rackers

Dr. Joseph Rackers
Professor of Piano
Eastman School of Music
Artistic Director
Southeastern Piano Festival

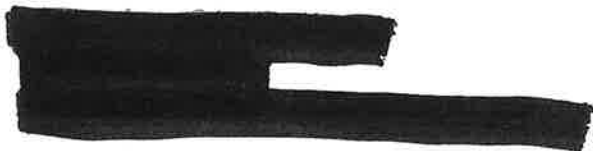


EXHIBIT 46

Stephen Winn



Greetings!

This letter is in support of Zachary Hughes.

I attended one of Zack's concerts just before COVID-19 altered our lives and had the opportunity to meet him and speak with him at length during a gathering after the event. We spoke of music and many other facets of life.

Due to COVID, I haven't been able to visit with him again in person but have kept up with his successes and challenges through mutual friends and acquaintances.

I now am retired after a thirty-six year career of teaching in South Carolina's public schools. It was my fortune to work with students of various ages (kindergarteners-senior citizens), various races, and various socioeconomic backgrounds.

Although it was my job (and privilege) to teach, I simultaneously was a learner. Perhaps my most valuable lesson was developing the ability to "read" others rather quickly and accurately.

I mention my experiences as a way of saying that I absolutely cannot imagine Zachary Hughes as either a danger to the community or a flight risk.

Thank you for reading this letter.

Stephen Winn

EXHIBIT 47

February 10, 2022

Mark Moyer Law, LLC
416 East North Street, 2nd Floor
Greenville, SC 29601

Att: Mark Moyer

Subject: Bond Grant for Zackary Hughes

I know Zackary Hughes as a neighbor and a very talented and dedicated concert pianist.

In recent months, even as Zack's main aim was to present the music of Beethoven, he took time to let his audiences understand Beethoven's motivation in his scores; Zack was able to convey this vividly and I feel he thought through and wanted to share this to others. His inner self was to make others enjoy life more through this music, I strongly believe therefore, instead of a danger to any person, he would help them through his music or himself. I have a personal example: Probably a year ago, my neighbors were going out of town and Zack told them to let me know if I needed anything to let him know.

After each concert he graciously stayed and chatted with his audience, individually, as they came to him. We could definitely see the inner person and his true interest in that person. My strong opinion is that this was sincere. At his last Beethoven concert in a beautiful mountain setting, with a large gathering on his birthday, I asked him what he was going to do now that he had finished the 32 sonatas, and he said that he was going to rest, and take off two weeks. A loud "Happy Birthday" followed.

As far as flight, I believe that what he wants is to finish what he had started – an unreal, great career beyond imagination. An example of this is that he is actually writing music while incarcerated without a keyboard and writing music for special people while there. I do not believe he would do anything to mar his chances of his living his dream.

Sincerely,



Mary Alice Shand



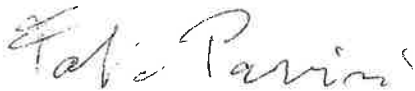
EXHIBIT 48

2/9/22

To Whom It May Concern:

I teach piano at North Greenville University. Zachary Hughes was referred to me in late 2009 by the local Steinway piano dealership; he had just moved to our area and was looking for a teacher to support his preparation for college auditions, which I followed until he moved to New York. His power, maturity, and abundance of repertoire were already remarkable at that time; since then, he continued to dedicate himself to his art, and became very well-known and admired in and outside Greenville. My wife and I attended several of his concerts, and he performed for my students; I also recommended him for scholarships and performance contracts. He became a friend and occasional collaborator of our own kids, also musicians, and we enjoyed having him over for dinner multiple times. We know him as a serious artist and a welcoming, cordial, and responsible person who enjoys bringing beautiful music to his community; I never saw him get so much as irritated or confrontational, so to me the idea that he could deliberately harm or endanger innocent people is simply ridiculous. As far as him being a flight risk, I just think that he would have fled long time ago if that were the case.

Thank you for your attention.



Fabio Parrini

Professor of Music, Piano Coordinator

Cline School of Music at North Greenville University



EXHIBIT 49

Andrew Natterstad



To whom it may concern,

My name is Andrew Natterstad. I am writing today, Tuesday March 22, 2022, on behalf of Mr. Zachary Hughes. My purpose in writing this letter is to state very simply what I know of him based on personal interaction; both in and out of a professional work environment. I have known Mr. Hughes for around two and a half to three years now. Our initial meeting was at our mutual place of employment where we were both hourly employees. Mr. Hughes departed said business in order to perform a very extensive concert series, which was subsequently cut short by the pandemic. He and I continued to maintain contact sporadically, until he returned to his previous position within the business I worked for. Upon his return I had been promoted to a management role that made me his direct supervisor. I left said role in September of last year to pursue endeavors of my own, and Mr. Hughes and I maintained contact as we had become friends, respected colleagues, and also teammates on the American Pool Players Association circuit. He was in competition as he was in his professions. Professional, cordial, and always very self controlled. He has been in my home. I have never feared for my safety or the safety of my fiancé in his presence; nor has anyone else I know who is well acquainted with Mr. Hughes. In the work place as well as competition, I have never seen him loose his cool, or act out in any way. He was incredibly valuable and easy to manage as an employee, and by my account was a great friend outside of work as well.

Sincerest regards,
Andrew Natterstad

EXHIBIT 50

March 3, 2022

Mark Moyer
Moyer Law Firm, LLC
416 East North Street, 2nd Floor
Greenville, SC 29601

Re: Zach Hughes

Dear Mark Moyer,

I have never personally met Zach Hughes. I became aware of him when my friends Jeannette and Marshall Winn invited me to attend Zach's first performance on a piano donated to their church. Unfortunately, I could not drive to Greenville, because my walking has deteriorated due to advancing age and polio.

I was so pleased to receive the news that Zach will be playing on facebook. I noted the event on my calendar and settled down to watch and listen to him explain and then play a Beethoven sonata. It was mesmerizing and breath-taking. His virtuoso rendition of a fiendishly difficult piece astonished me and, at the same time, gave me so much joy. I started piano lessons at the age of three and I know what dedication it takes to reach this level of mastery. I have a cousin who is a concert pianist and she makes the distinction between piano player and pianist: The first is someone who dabbles in playing the piano; the second is a professional. Zach is clearly in the second category. Unfortunately, facebook security cut off transmission in the middle of the performance. Even facebook security thought this was a professional performance and cut off the transmission for fear of copyright violation. I believe that this is a complement to the pianist, but as a member of the audience, I was not pleased to have my enjoyment cut short.

You can imagine how delighted I was when Zach teamed up with our very own South Carolina museum of pianos to record all Beethoven sonatas. I believe there are over 30 of them. I watched most of his recordings and found them exquisite: So sensitively interpreted and masterfully played.

When I heard that Zach voluntarily submitted to incarceration, I was in disbelief. Somebody, somewhere made a huge mistake. There was no way a musician of Zach's caliber and sensitivity could commit such a crime. Nor would I consider him a flight risk, since he clearly obeyed the law regarding his arrest warrant.

I wrote him a letter, describing my father's sudden arrest and imprisonment in China under Mao's regime. He was accused of being a spy even though there was no evidence. Mao's regime had bankrupted the country and the only way he could get more foreign currency was by threatening and blackmailing foreign nationals living in China. After two and a half torturous years, he was released, having paid a huge fine and written a dictated confession. Zach wrote back, thanking me for my support.

I believe that Zach is innocent and that he should be out on bond.

Sincerely,



Inge Kutt Lewis

EXHIBIT 51

From: Manuel Saoud [REDACTED]
Date: Monday, February 14, 2022 at 5:10 PM
Subject: Re: Zack Hughes

I'm actually German and I was sent for work to Greenville for about 9 months back in March 2018. In September I decided to join a salsa class where I met Zach. Outgoing as he is he talked to me while we were waiting to sign up and we got along. One week later he joined salsa classes again and I was thinking about a roadtrip to New Orleans for the Labor Day weekend which was only a day after the class. Since I needed a second driver and in general company I invited Zach to join my trip. He agreed very spontaneously and a day after we were on our way to New Orleans for the long weekend. Before I picked him up I wasn't sure if it was a good idea to be on a 10-hour ride and the whole weekend with a guy I've had barely talked to. Just about 10 minutes after we started I forgot about it and for the next days we meant to become very good friends. Great conversation, bad jokes and much laughter made the ride didn't last long.

From the beginning I've enjoyed and appreciated his wise and very generous soul which he always radiates. The weekend was fulfilled with a lot of jazz music (he taught me a lot about it), good food, trip to the swamps and black magic. From there on we were doing many roadtrips during the last two months I stayed in Greenville and I got to know many sides of Zach. A great musician, loyal friend, hard-working, outstanding, clever and right-hearted who would always help out. He is so much, but definitely not a danger to the community or a flight risk.

Of course we stayed in contact after I left and a year later we were continuing with what we were doing the best: a roadtrip through northern Italy. Zach is craving for culture, good food, music and the unknown. Even if he is an extraordinary person he is as well a very simple man with the focus on the bare necessities to be happy. A man with so many dreams and strive for freedom would never waste his life for such a terrible thing. I'm more than convinced in Zach's innocence.

Best,
Manuel Saoud

EXHIBIT 52

SHERRY PARRINI, PIANIST

February 18, 2022

To whom this may concern:

I am writing to vehemently support Zachary Hughes. I have known Zack since he was a teenager as an amazing pianist and a piano student of my husband, Fabio Parrini. We have watched Zack grow up into a wonderful, patient, kind and funny young man. He has been an extended member of our family since we've known him.

I am a huge fan of Zack's playing. I saw his performance of Saint-Saens Piano Concerto with the Greenville County Youth Orchestra at the Gunter Theatre in 2010. In June of 2011, I was sitting in the audience at the USC School of Music when he won first place in the Southeastern Piano Festival after his powerful performance of Beethoven's Waldstein Sonata and the last movement of Rachmaninoff's second piano concerto. That fall, we traveled down to Columbia to hear him perform Beethoven's Piano Concerto No.5 with the SC Philharmonic. I have tried to attend as many of his recent concerts of his mammoth project of all 32 Beethoven Sonatas, including his last performance on October 2 of the last 3 sonatas.

Zack in no way poses a danger to the community. He is one of the kindest individuals I know. I've never seen him get angry. Zack house-sits for our cats when we travel. One time he went with us to Carowinds. My daughter, Maria, has grown up admiring Zack as a musician and now they are very good friends. Zack often has dinner at our house (including Thanksgiving) which turns into piano duets with Maria, or Zack will accompany my son, Sam, a violinist. Sometimes we play goofy board games and Zack's laughter is contagious.

We have been there for Zack when he decided to join the Marines and then when he had to leave training due to injuries. We have continuously encouraged him to move forward with piano and perform. And he has done so beautifully.

The nature of being an excellent musician means attending music schools that draw people from all over the world. Because of that, you become friends with people who live in far away countries. One of these days my dream is to visit my best friend in Tokyo and another in Brazil that I met at Boston University - 30 years ago. Juilliard is where Zack met, shared apartments with and played with people from all over the world. These friendships are long lasting but it's an overly dramatic exaggeration to believe these friends would be willing to harbor a fugitive from the law.



Zack was about to start a contract with Lincoln Center Stage as a pianist in one of the many chamber music groups for Holland America cruise line. These contracts are for four months at a time and they pay very well. My daughter did this for two years seeing the world until Covid canceled her Asia contract. She was the one who encouraged him to apply.

Zack had an expired passport and flew to Detroit for an appointment to process an emergency passport for the Lincoln Center/Holland America contract. While he was in Detroit the Greenville Police Department issued a warrant for his arrest. He rented a car and drove back to Greenville to turn himself in. That in itself is proof that he is not a flight risk. It seems logical to me that people who are flight risks do not turn themselves in to police.

I have been corresponding by letter with Zack while he's been in jail. He is beyond patient and I have vented my frustration to him at the amount of time he's had to stay in jail knowing a true investigation into this murder would exonerate him. His responses reflect a wisdom and maturity I do not believe I will ever acquire.

Now here we are writing letters demonstrating that this wonderful young man is not a flight risk or a danger to the community. I would also like to add that he is not what the sheriff has accused him to be. It is my dream that he will be released (and exonerated) as soon as possible and this nightmare will end.

Most Sincerely,
Sherry Parrini



EXHIBIT 53

I met Zack a few years ago when I moved to Greenville to pursue a welding trade. I had begun working part time bartending at one of my cousins restaurants where he was also bartending. We very quickly became fast friends. I noticed early on that Zack had an affinity for both compassion and conversation. He didn't hesitate to lend a hand or an ear. Six months after living in Greenville I moved back to my hometown in Lexington, SC and honestly thought the distance would kill the friendship. I was very wrong. We continued to get together about once a month and played online games together. About a year and a half ago he began coming down for the weekends and very quickly became a favorite among my friends. Very soon he had a group of friends 90 miles away. That's the effect Zack has on people. You can meet him once or twice and then regard him as a friend for life. Despite what he is being accused of I remain unwavering in my support for him. The thought of him raising a hand against anyone seems like such a lie. There have been plenty time in our shenanigans that he has had cause for anger and has instead chose to resolve it through diplomacy. I think of Zack as a brother and I always will. His hands are only used for firm handshakes, beautiful music and to knock back a couple glasses of mead.

Noah Stratton

EXHIBIT 54

To Whom It May Concern,

My name is Susan Zhang, and I am a pianist and co-director of The Concert Truck, a mobile concert hall that gives communities access to live musical performances in an outdoor setting. I am writing this letter on behalf of Zachary Hughes. I am aware that he is charged with the murder of Christina Parcell.

I have known Zack since 2011, and he and I have worked together on numerous occasions, performing as a piano duo from 2014-2017. The process of preparing for and performing in collaborative concerts can be stressful, involving long hours of rehearsal, disagreements in musical vision, extensive travel, and performance anxiety. Despite these stressors, Zack displayed professionalism and graciousness throughout our working relationship. He remained patient and logical when conflicts arose and approached problem solving with calmness and intelligence. He was a rock for me during my moments of self-doubt and exuded a positive outlook, excellent work ethic, and deep love for music that helped make our collaboration successful.

As an artist, Zack is interested in exploring and sharing beauty and meaning in the human experience. He strives to make the world a more beautiful place with his artistry and has shown generosity with his talents. During the pandemic, he performed in outdoor concerts of Beethoven's music that were free to the public to help lift spirits within his community.

Zack has been a close friend to me over the years. I have always known him to be a good, trustworthy person with great integrity. He understands accountability and follows through with his word. I am constantly inspired by his discipline, which he shows not only through consistent practices of music, fitness, and achieving inner balance, but also with his commitments to others. Zack has a gentle spirit and is a profound thinker with a kind and loving heart. He has always been there for me, supporting me through my darkest times with empathy and compassion, and I have seen him show the same care and sensitivity for others. He is a positive force and source of light in my life, as he is for so many people.

From my experiences with Zack, I am extremely shocked that he has been accused of the crime with which he has been charged. The person I know is incapable of violence. If Zack receives bail, I have no doubt that he will fulfill his obligations to the court.

Thank you for reading this letter. Please do not hesitate to reach out at the number listed below if you have any additional questions.

Sincerely,
Susan Zhang

