

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

UNITED STATES OF AMERICA : CASE NUMBER 3:19 CR 0161 (VAB)
vs. :
PAUL GILENO : OCTOBER 7, 2019

DEFENDANT'S SENTENCING MEMORANDUM

I. INTRODUCTION

On or about June 17, 2019 the defendant, Paul Gileno, waived Indictment and entered a guilty plea to a two-count Information charging him with Wire Fraud, in violation of 18 U.S.C. §1343, and Tax Evasion, in violation of 26 U.S.C. §7201. In the parties' plea agreement, the Government sets forth certain enhancements it believes should be applied in the defendant's case, *to wit*, 1) a loss greater than \$1.5 million per U.S.S.G. §2B1.1(b)(2)(I); the offense resulted in substantial financial hardship to one or more victims pursuant to §2B1.1(b)(2)(A)(iii); and that he abused a position of trust under §3B1.3.

In accordance with Rule 32(o) of the Local Rules of Criminal Procedure the defendant respectfully submits this memorandum as an aid to the Court and in support of his request for a variance or non-guideline sentence, including that the aggregate loss is less than \$1.5 million and that the substantial hardship enhancement should not apply in this case. Mr. Gileno presents arguments that are firmly rooted in the letter and spirit of the Guidelines to suggest that a sentence below the guideline range would be sufficient, but not greater than necessary to comply with the factors set forth in 11 U.S.C. §3553(a). He's learned a painful lesson from his conduct in this case. Moreover, his history and character supports a sentence below the guideline range which would satisfy the Court's mandate to impose a fair and just sentence.

II. SENTENCING ARGUMENTS & RECOMMENDATION

Mr. Paul Gileno is a dedicated family man who has worked tirelessly his entire life to support not only his family, but others too, who have been confronted with emotional and physical pain and hardship. Counsel hopes this sentencing submission makes clear that he is a genuine and selfless man whose main concern now is to provide for his family, and make amends with U.S. Pain Foundation by working to reimburse the organization for the monies he misappropriated. Paul's letter to the Court, which is attached to this memorandum, confirms his commitment to his family and the foundation's members who he's disappointed and let down by his conduct. See Exhibit A. The undersigned counsel can confidently say that Paul has punished himself more than any sentence will ever deliver.

As the Court knows and as previously stated, a sentence must be "sufficient, but not greater than necessary" to comply with the sentencing factors set forth in 18 U.S.C. §3553(a). Based upon the arguments advanced in this memorandum, Paul Gileno respectfully asks this Court to impose a sentence significantly below the Guideline range, which would still fulfill the requirements of a fair and just sentence. He is obviously aware that the Court must arrive at its own conclusion relative to what would constitute an appropriate punishment for this conduct. However, a sentence below the advisory Guidelines range would more than satisfy the Second Circuit's recognition of imposing "individualized justice", United States v Crosby, 397 F.3d 103, 114 (2d Cir. 2005), *abrogated on other grounds*, United States v Fagans, 406 F.3d 138, 142 (2d Cir. 2005), as well as the statutory mandate that a sentence be sufficient, but not greater than necessary to comply with the purposes of sentencing. Accordingly, Mr. Gileno is asking the Court to impose a sentence that would not keep him

away too long from his two young boys and wife, who will assuredly endure their own hardship from his absence.

A. History and Characteristics of the Defendant

In fashioning an “individualized” and just sentence, 18 U.S.C. 3553(a) directs the Court to consider the history and characteristics of the defendant. In this case, there are several factors in Paul’s life that should give rise to such consideration, including but not limited to; his deep-rooted family commitment; strong history of employment; generosity, kindness and service of helping others through the CT and US Pain foundations; and his true contrition for his actions. These factors, considered separately, or together as a combination of factors, warrant a sentence below the recommended advisory range, which would be sufficient to meet the goals of sentencing in this case.

Sadly, Paul was born into a home that was controlled by an abusive, alcoholic father. As a young boy, Paul recalls many memories of receiving corporal punishment at the hands of his drunk father, and witnessing him beat his mother. On several occasions the police were summoned for intervention. This fear of impending danger dominated young Paul’s conscious, even after his mother separated from his father. It also became part of his emotional being later on in life as an adult – the fear of not being able to protect his family. After leaving his father, Paul, his sister and mother moved in with his maternal grandmother, furnishing the basement and making this their new home. The family struggles continued for a little while longer but then Paul’s world changed for the better when his mother met and married Joseph Gileno, a gentle soul who embraced Paul and his sister, Nicole, as his own children. Suddenly, Paul found himself in a warm and loving refuge, far removed from the brutality he experienced as a young boy.

Paul's mother and new father exposed him to a life that was filled with love, family togetherness and support. His parents had five children together, so with Paul being considerably older than his younger siblings, he was relied upon to set a positive example for them. Thankful for this new life, Paul took this responsibility to heart and he committed himself to becoming a solid citizen and role model to his brothers and sisters. Of course, this often meant sacrificing his own pleasures to spend time at home as a teenager with his siblings, while his friends were out and about socializing. But Paul gladly accepted this obligation with great pleasure because he was so appreciative of the gift he had been given with this family.

After attending a local college for two years where he studied engineering, Paul discovered his true passion for cooking. With an entrepreneurial spirit, Paul decided to open a deli shop and catering service, which required him to work many long hours for 6-7 days per week. Notwithstanding his time away from the family, Paul's ingenuity created an opportunity to teach his younger siblings about responsibility by employing them after school in the business. This allowed them to still spend time together while also earning some extra wages, and the business thrived for approximately five years.

Today, the siblings fondly recall those special times they shared together as a family. In hindsight, Paul does not regret one moment of time he spent with his siblings because his interaction with them established a lasting bond that still holds strong today. Many of the brothers and sisters live in the same community on the New York/Connecticut border, and they gather regularly for family events and celebrations. All of Paul's siblings have written letters of support, and in each one, they describe their older brother as the glue to the sibling's enduring connection. By way of examples, counsel has taken excerpts out of the

countless letters of support from Paul's family members which have been submitted on his behalf (See **Exhibit B**):

"A person isn't born with a certain character; it takes years to become the person you are in life. Paul's character is built on love, family, values, traditions and hard work....He is a person...I would want my son and nephews to be in the future. He is the definition of love, values, family, dedication, positivity, tradition and hard work." Nicole Gileno (younger sister)

"Growing up in a home in the Bronx we had it all and nothing at the same time. We lived in the basement of my grandparent's home for many years and I do not see a family that could have been happier or prouder of our childhood... We didn't need anything if we had each other and Paul being the oldest showed us that daily. Paul makes time for everyone without hesitation and without complaints." Jennifer Connolly (sister)

"Paul is the "rock" of our siblings. During mom's battle with cancer, Paul helped the siblings stay positive and was there every minute and I honestly believe he was a major part of my mom's recovery." Michael Gileno (brother)

"There are three big moments that stand out that showed his [Paul's] strength through difficult times [mom's cancer, dad's open heart surgery, and Paul's first son's birth]. He was the shoulder to cry on and ear to listen. He made sure to sit with everyone checking in on them. He was always so comforting making sure everyone was okay. His strength and optimism helped us [the family] get through these most difficult moments in our lives." Maria Gileno (sister-in-law)

"Paul is a wonderful father to his boys. They adore him tremendously. They love to help him cook at home. They wear an apron and chef hat and say "I am just like my daddy." The love he [Paul] has for his wife and children is so wonderful because he always wanted to be a father which he became later in life. His love for people, his family and friends is not measurable." Andrew Gileno (brother)

"Instead of being a normal teenage kid, Paul spent his time being around the younger siblings, making videos of his brothers and sisters being kids, and creating memories that are enjoyed in adulthood at family gatherings. He did all of this while most other teenagers would hang out in the streets...in the food business, I've seen Paul train others in the food industry, the perfect

example of giving someone a chance. He is a dad, just like he was as a boss, someone who listens and guides without hesitation and frustration. He is a man who without fail, will do whatever he possibly can, whole-heartedly, to help someone to the best of his ability.” Joseph Gileno (brother)

“Paul has taught me no matter what happens in life that family always comes first. Paul has welcomed mine into his life as if we have known him forever. He truly is the definition of a wonderful human being...” Tracy Michaud (sister-in-law)

“When Paulie was 13 he decided to work a paper route before school and to work in the corner deli to help the family...He was there to help me [mom] with chores and watching over the younger siblings. At 23 Paul opened his own deli and catering business and worked long hours, seven days a week. All his siblings helped out.” Diane Gileno (mother)

“Paul is a fabulous husband, father, uncle and someone I am happy to say is more of a brother to me than a brother in law.” Melissa Gileno (sister-in-law)

“As a young boy, Paul would go to the neighbor’s house rake leaves, or shovel snow, just because he knew that they needed help.” Kim and Frank Ward (aunt and uncle)

“He’d [Paul would] always put his family before himself and would give you the socks on his feet if you told him you were cold.” Frank and Jess (Cousins)

“Paul’s grandfather saw and was proud of the man Paul had become and always said they broke the mold after Paul was born. When Paul’s grandfather fell ill and needed hospice care, Paul flew to Florida to stay with his grandfather at Hospice. Paul felt his grandfather would feel his presence and know that Paul was there for him until the end.” Joseph Grill (uncle)

“Growing up, he [Paul] helped his parents look after his brothers and sisters and was always there for all of them with a helping hand. Paul is kind, generous and considerate and has always had the respect of his family, friends, and colleagues.” Elissa DeLuccy (aunt)

Life as a young business owner appeared to be going well for Paul, but then tragedy struck when he severed his sciatic nerve while lifting a box at work. Suddenly, all of the dreams he had worked so hard to fulfill became a nightmare. Over the next few years, Paul endured two major surgeries to try and alleviate the constant pain he was experiencing in his lower back and he was primarily bedridden during this period. Unfortunately, the 2003 medical procedures failed to bring the desired results, and with the pain persisting, Paul fell into a deep depression. As a person who formerly possessed so much optimism and energy to accomplish success in life, Paul found it extremely difficult to accept the fact that he was now disabled.

A few years passed with Paul still in an emotional vortex when he finally realized that he needed to extract himself from this misery to feel a sense of purpose again. Feeling sorry for himself did not accomplish anything, and he recognized there are many others in the world who are similarly situated as he, living with pain, despair and hopelessness. After doing some research, Paul took the initiative to open an online support group out of his home in Shelton. This will be discussed more fully, *infra*, in the Nature and Circumstance of the Offense section of this memorandum.

After two failed marriages, in 2013 Paul met the love of his life and future wife, Jennifer. At age 41, Paul finally found a partner with whom he could start a family. He had waited so long to become a devoted father, the antithesis of what his biological father was to him. Jennifer had a daughter, Sage, from a previous relationship, and a step-son, Jordan, and much like his step-father, Paul welcomed them as his own with open arms. The couple had their first child, Santino, in 2013, and his birth tested their resolve as new parents. Santino was born prematurely with a medical condition that impacted his respiratory system, thereby causing some developmental delays. He requires occupational therapy and other specialized educational

needs. However, Paul and Jennifer were blessed with a second son, Lucas, in 2015 who is healthy and full of life, terrorizing his older brother. After the second son was born, Jennifer stayed home to care for the boys, which placed an added financial burden on Paul. The family had been living off of Paul's private disability pension, which he fortunately had purchased prior to his back injury, and this income, along with Jennifer's income as a pharmacy technician. Jennifer believes this is when Paul made the bad decision of tapping into the foundation's account by misappropriating funds to himself. Even though Paul's conduct has placed a difficult strain on the family, with his impending incarceration and sizeable restitution, Jennifer remains committed and supportive of her husband. In her letter to the Court, she writes;

"It was terribly wrong for him to treat the foundation as a small business and not as a non-profit for those two years...He is a great man and a great father...he loves my daughter and cares for her emotionally like she was his own. He is the father I always wished for her and he treats my step-son the same way. He would do anything for these kids and they love him and they are his world. He is a caring and generous person who always goes out of his way to help people, family or strangers. I am so proud he is our daddy and that our boys have him to look up too [sic]." Jennifer Gileno (wife)

Sage Kilbourn, Jennifer's daughter also commented about her step-father's kindness and acceptance of her by writing:

"Law must remain black and white in order to limit chaos, but there is a pure beauty in the justice system's ability to see through the greyed lens of humanity. Paul seamlessly stepped into a parental role within my life because of his earnest love for me as a daughter." Sage Kilbourn (step-daughter)

Paul is a man who takes ownership for his actions. He recognizes he will pay a hefty price for the rest of his life, not only with the punishment he faces, but also the financial and emotional toll his conduct will have on his family. Obviously, this weighs heavily on Paul's mind and heart on a daily basis, knowing that his actions in the instant offense will severely impact his family's wellbeing, especially his two young boys, who worship their father. In his letter to the Court, Paul writes:

“As I contemplate what I have done...I see only one positive...I need to use this experience as a learning tool for others especially for my boys. I want them to understand in life there are consequences to our actions, I want them to understand they must be honest and take ownership to mistakes. I want them to learn that no matter what, doing the right thing always is right and just. Facing the facts when you make a mistake is key.”

This passage shows the Court the kind of man Paul truly is, selfless beyond words - always looking to help others. Paul understands he must be held accountable for his actions. However, counsel respectfully asks that in fashioning an appropriate sentence in this case, the Court take into consideration Paul’s generosity and kindness to others over his entire life.

B. Nature and Circumstances of the Offense

After Paul was injured in the fluke accident which caused him to sever his sciatic nerve, he felt isolated from the world he had previously lived in, unable to contribute to the community in any meaningful way. However, once he realized there were many despondent individuals in the world who needed a strong shoulder to lean on, or a person to speak to about their pain and suffering, Paul came to the realization that he can be that shoulder or ear to others. When the initial concept of a non-profit pain foundation was created in Paul’s mind, he wanted to establish a forum for people with pain, where they can get information, seek advice, offer help, or just let their voices be heard. This was the inauguration of the Connecticut Pain Foundation in July of 2006. Over the next five years, the foundation’s membership grew and Paul worked tirelessly to expand the footprint of the organization beyond Connecticut’s borders. Paul received no compensation for his efforts and even put his own money into the venture because he recognized the benefit that the foundation had to its members. This was quite rewarding to Paul as he received a lot of positive feedback from them. But his drive to create a respected and highly regarded pain foundation ultimately led to his divorce from his second wife in 2013. Although

the couple went their separate ways after the divorce, Paul's ex-wife still found the time to write a letter in support of him:

"...Paul decided to start a support group to help people with pain. He started to use our money to start this support group. As his support grew he then decided to start CT Pain Foundation. He started to work on this project every moment and he used our money to run it, he used our money to do what was needed to make it something that could help people. He was obsessed with it. He would say the more he does the better he feels and that he has a purpose. Sadly, this put a strain on our life as he was funding this project with our money. He grew it from nothing and did this without funding for over 4 years. Eventually it would become US Pain Foundation. His dedication to helping others who were suffering was amazing to see but at the same time sad because we drifted apart. I know Paul is a good man and I am sure an amazing dad. I know he is a dedicated person always looking out for others....all he wanted was to help others and make change not only for himself but for others.' Shelly Olivadoti (e-wife)

In 2011, Paul decided it was time to change of name of the foundation by giving it more of a national exposure. Hence, the name change to U.S Pain Foundation. With an ever expanding reach, Paul began writing grants and weaving educational programs, publishing brochures, and designing other innovative projects into the foundation's branding. As the foundation continued to evolve, Paul quickly discovered he needed a support staff to handle the daily tasks of running this foundation.

During this time, Paul continued to receive counseling for his depression, anxiety and difficulty adjusting to life changes resulting from his chronic pain. He treated with Dr. Michelle Gargan of New Canaan Psychotherapy Associates, and she counseled him, amongst other things, on the way he was operating the foundation. Dr. Gargan became concerned that Paul was running the foundation more like a private business than a non-profit organization. (See **Exhibit C**). The way Dr. Gargan describes it:

"Paul agreed in principle with doing things the right way, but he often took action steps before setting the proper structure in place. This caused a rift in his

marriage since he was using personal money to fund the foundation...Paul is a man of action. He is entrepreneurial, quick-thinking, decisive and enthusiastic about helping others. He has been impulsive, making decisions or promises without thoroughly thinking through the consequences...To his credit, Paul did initiate a review of US Pain finances as well as policies and procedures because he recognized the necessity of professionalizing the organization. Unfortunately, he should have attended to the structure of US Pain at the very beginning of the foundation.”

By 2016 Paul hired a hand-full of employees to assist him with the operation while he traveled the country to attend seminars, charitable trade shows, and solicit corporate funding. The organization’s coffers were beginning to fill with monies obtained through corporate charitable donations to fund and promote the foundation’s mission statement. After working for close to 10 years without receiving as much as a dime from the foundation’s account, Paul convinced himself he was now entitled to start paying himself a salary commensurate with a successful non-profit executive. After all, he was the president and founder of the well-respected US Pain Foundation. With a mentally disabled child at home and a growing family to provide for, Paul took the foolish step of misappropriating hundreds of thousands of dollars from the foundation’s account. As Paul explains, his mindset at the time that he committed the offense was misguided:

“I took the money and, in my mind, justified it by saying to myself, I deserved it at the time, I needed it and US Pain had it. I justified it multiple ways, 1) In the beginning of US Pain, I put up all the money to get US Pain going, I spent my own money to grow the foundation for the first few years, 2) I never took a salary until 2017, I started the organization in 2006. When I started to take the money, I justified it by thinking I deserved it, but I went about it the wrong way.”

Of course, Paul’s logic is completely wrong and misplaced. If he truly felt he was entitled to be compensated for his work at the foundation, he should have presented his request to the board members and let them vote on it. But he didn’t do this, and now he is paying the price for his misdeeds.

Even though Paul is no longer affiliated with US Pain Foundation, he still harbors a deep and spiritual connection with the foundation and its membership. Paul describes his feelings below;

“US Pain gave me hope and it gave thousands upon thousands hope. It truly is created by people with pain for people with pain. The people who still run US Pain today are the ones I brought on over 10 years ago, they are the ones who gave me hope and light. Together we helped people realize they can live a fulfilling and hopeful life despite pain. I miss them so much, I am so disappointed in myself for letting these people down, I am so sad and sick over the fact I lost those important bonds, I lost the people who helped me with my pain and who allowed me to help them on this pain journey. The guilt I feel is overwhelming and heartbreaking...I will always and forever be an advocate for people with chronic illness. I don't want my mistakes and wrong doings define me, it is not who I am.”

At the risk of being ostracized by the many US Pain members who feel betrayed by Paul's conduct, a few courageous members, and/or individuals who interact with the foundation wrote letters or sent emails nonetheless in their support of him (See Exhibit D):

“I ask the court to take into consideration the good he [Paul] has done for so many with chronic pain and illness...Without Paul and US Pain Foundation, I firmly believe I'd be dead. He gave me a purpose again, the opportunity to be an ambassador and advocate, through US Pain Foundation. He reminded me that we all have something to offer.” Jeannette Rotondi (US Pain Foundation member)

“...US Pain helped to give me my life back. My disabilities left me questioning if I could contribute worthwhile ideas in any capacity. When others in the organization pushed to silence me, Paul encouraged my out-of-the-box thinking. My confidence grew under his leadership and I was able to build my Light Up The Landmarks concept into a successful awareness campaign with his encouragement. Jacki Drexel (US Pain Foundation member)

“Paul has been recognized as a hero among a population of people who are often ignored. I personally recognized him as such, too. His hard work has been recognized by multiple reputable organizations.” Dr. Lynn Webster (PRA Health Sciences)

“US Pain Foundation, through Paul’s leadership, along with 3 other patient advocacy organizations have sponsored a camp for children in pain at the Center for Courageous Kids in Kentucky. The camp is a life-changing experience as the campers feel like kids again for the first time since the onset of their illnesses.” James Broatch (Director and Executive VP of RSDSA)

These letters demonstrate and emphasize the comments made by Paul’s family and friends, *supra*, that he is a selfless man who truly cares about the wellness of others. Although the conduct Paul engaged in paints a picture of a greedy, selfish individual, counsel respectfully submits this portrayal belies the actual character of this man.

C. Protecting the Public From Further Crimes

Paul Gileno has been a model citizen for the majority of his life, excluding the current offense. He’s always had a strong work ethic since a young age, and this trait is still evident today while Paul awaits sentencing. Following the negative social media postings and articles that were distributed by US Pain and published by industry trade magazines after Paul’s resignation, he’s found it difficult to land another position with a non-profit agency that would benefit from his corporate contacts or utilize his exceptional skill of soliciting charitable funding. Fortunately, Paul’s food background enabled him to secure employment as the general manager and chef of a local café and catering business in North Salem, New York. (See **Exhibit E**– Hayfield’s Letter of Support). The owner, Renea Dayton hired Paul when she was pregnant and desperate for assistance with her business. Being aware of his current situation, Ms. Dayton took a chance and hired him to manage the day-to-day operation of her small family business. Paul has exceeded her expectations by being honest, trustworthy, and extremely dedicated to addressing the needs of her customers. But this is who Paul is – reliable, hard-working, trustworthy and enthusiastic.

In considering the need to “protect the public from further crimes of the defendant,” this Court must balance Paul’s lack of a prior criminal history with the circumstances that caused him to become a participant in this offense. This man has a deep love for his family and he appreciates the lessons he’s learned from his arrest. Paul’s sincere remorse and desire to pay back the restitution produces a compelling argument that he will refrain from any future wrong doing. Counsel is confident that Paul Gileno is a man who can meet the strict mandates of supervision following a relatively short period of incarceration.

Accordingly, a sentence approaching the PSR’s advisory Guideline range will have no greater deterrent effect than a significantly lower sentence of imprisonment. Just punishment may be imposed and proper respect for the law promoted with a sentence consistent with our proposal.

III. SENTENCING GUIDELINES

A. Substantial Financial Hardship Enhancement (U.S.S.G. §2B1.1(b)(2)(A)(iii))

The Government seeks a two-level enhancement under U.S.S.G. §2B2.1(b)(2)(A)(iii). Pursuant to this guideline provision, a two-level increase in the offense level is warranted if the offense resulted in “substantial financial hardship” to one or more victims. Application Note 4(F) provides, “In determining whether the offense resulted in substantial financial hardship to a victim, the court shall consider, among other factors, whether the offense resulted in the victim-

- (i) Becoming insolvent;
- (ii) Filing for bankruptcy under the Bankruptcy Code (title 11, United States Code);
- (iii) Suffering substantial loss of retirement, education, or other savings or investment funds;

- (iv) Making substantial changes to his or her employment, such as postponing his or her retirement plans;
- (v) Suffering substantial harm to his or her ability to obtain credit.

Taking into consideration the list of factors that a court must consider in determining whether this enhancement applies, the defendant respectfully submits that US Pain should not be considered a victim in this case. US Pain Foundation is a non-profit organization whose funds were derived from charitable corporate donations for promoting the mission of helping people with pain. As such, the funds did not belong to US Pain, so the foundation cannot be considered a victim of the defendant's actions. Moreover, none of the factors listed above applies to US Pain Foundation: For example, the foundation has not become insolvent, and they have not filed for bankruptcy. The other factors pertain to individuals, and do not appear to address corporations, non-profits, or other business-type ventures. Accordingly, a two-level increase of the defendant's offense level is not warranted in this instance. Thus, Paul Gileno's total offense level should be adjusted to a 22, with a resulting guideline range of 41-51 months.

B. Loss Amount is Less Than \$1.5 Million

The Government calculates the defendant's loss in Count One at \$2,099,000.00. This sum, in conjunction with the loss figure estimated by the Government in Count Two, places Mr. Gileno over the \$1.5 million threshold, thereby triggering a 16-level enhancement above the base offense level of 7. In contrast, Mr. Gileno asks the Court to take into consideration that for nearly 10 years he did not draw a salary for the work that he performed with either CT Pain Foundation or US Pain Foundation. Using the figures derived from payscale.com, if one were to calculate the average yearly salary for a president of a non-profit organization at \$105k, the defendant would have earned approximately \$1,050,000 during this time period. (See **Exhibit F-**

www.payscale.com/research/US/Job=President,Non-Profit. If you offset the Government's loss amount in Count One with this figure, Mr. Gileno's total loss for Counts One and Two would be significantly lower and approach the \$1.5 million threshold.

Accordingly, counsel respectfully asks the Court to consider adopting the defendant's argument and lower the total loss amount under U.S.S.G. §2B1.1(b)(1) to more than \$550,000 but less than \$1.5 million, resulting in a 14-level increase. See U.S.S.G. §2B1.1(b)(1)(H).

IV. CONCLUSION

As cited above, a fundamental principle of sentencing is that a court "shall impose a sentence sufficient, but not greater than necessary" to meet specified sentencing goals, including the goal of "just punishment." *See* 18 U.S.C. §3553(a). Paul Gileno understands that he stands convicted of two serious federal crimes and that these convictions have significant consequences. The arguments advanced in this memorandum for a sentence below the guideline range in no way seeks to diminish the actual seriousness of the crimes for which he has been convicted. Rather, Paul's background, his history and character, his sincere contrition, and the circumstances of the offense of conviction, are factors for the Court to consider for imposing a sentence below the advisory Guideline range. For these reasons, a sentence significantly below the advisory guideline range would be a sufficient and just sentence in this case.

The Defendant
Paul Gileno

/s/ William H. Paetzold
William H. Paetzold
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CERTIFICATION

This is to certify that the foregoing was filed electronically on October 7, 2019 to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing.

/s/ William H. Paetzold
William H. Paetzold

EXHIBIT A

Letter from Paul Gileno

EXHIBIT B

Letters of Support-Friends and Family

EXHIBIT C

Letter from Dr. Michelle Gargan

EXHIBIT D

Letters from US Pain Members/Affiliates

EXHIBIT E

Letter from Employer-Hayfields

EXHIBIT F

Internet Wage Reference from Payscale.com

EXHIBIT A

Letter from Paul Gileno

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EXHIBIT A

Dear Judge Bolden,

I would like to introduce myself, my name is Paul Gileno and I am being sentenced on October 29, 2019 in your courtroom for crimes I plead guilty for, crimes I am not proud of nor I hope never define who I am. I am a Dad to two amazing and beautiful little boys, Santino who is 5 and Luca who is 4, they are the light and loves of my life and who keep me going each day. I am a step Dad to two beautiful young adults, Sage 23 and Jordan 24 both I have known for almost 7 years now and fell in love with. I am a husband to a strong, forgiving and patient woman, Jennifer who has given me so much, especially my boys. Jennifer is going through so much and working so hard to be strong for me. I am the oldest of 7 brothers and sisters all whom I respect and love and all whom, I hope with the grace of God still look up to me for advice and strength. I am a son, a grandson, I am an Uncle to 20 nieces and nephews, I am a chef by trade, an advocate for people with chronic illness and a person who has been suffering with chronic pain for 16 years now.

I cannot even express how sorry I am for what I have done, I made mistakes, I screwed up majorly, I mismanaged, I was careless and I took money that was not mine, I used it for personal use and I was selfish. I took the money and, in my mind, justified it by saying to myself, I deserved it at the time, I needed it and US Pain had it. I justified it multiple ways, 1) In the beginning of US Pain, I put up all the money to get US Pain going, I spent my own money to grow the foundation for the first few years, 2) I never took a salary until 2017, I started the organization in 2006. When I started to take the money, I justified it by thinking I deserved it, but I went about it the wrong way.

I am proud of the organization I started from nothing, US Pain gave me a purpose in life when I felt I had nothing and I was nothing because of pain. My darkest days of Pain led me to start a support group for people with pain, which led me into patient advocacy, which led me to building a web site, which then led me to creating programs to help people like myself with pain. US Pain gave me my family of choice, people I love and trust. US Pain gave me hope and it gave thousands upon thousands hope. It truly is created by people with pain for people with pain. The people who still run US Pain today are the ones I brought on over 10 years ago, they are the ones who gave me hope and light. Together we helped people realize they can live a fulfilling and hopeful life despite pain. I miss them so much, I am so disappointed in myself for letting these people down, I am so sad and sick over the fact I lost those important bonds, I lost the people who helped me with my pain and who allowed me to help them on this pain journey. The guilt I feel is overwhelming and heartbreaking. I do have some light, I know US Pain is still moving forward and is still helping thousands of people, I know the mission has not changed and many are being helped even though I am not a part of it and even though my name is ruined and lost, at least I know what I started is still going and changing lives. I still watch the US Pain web site and I continue to help those who need help, I will always and forever be an advocate for people with chronic illness. I don't want my mistakes and wrong doings define me, it is not who I am.

I will never make an excuse for what I did as there is no excuse and I know I will pay for this for the rest of my life, not only financially but emotionally as the guilt will be there forever. I will forever feel remorse for taking money and ignoring the proper channels. However, I do know that I tried to do the right thing to help the foundation and to make sure it was strong and had longevity. I hired an attorney to help US Pain become strong and to develop the correct way, this attorney ultimately recommended after many months of working with her, that I resign and I hire my own attorney. I hired an accounting firm to audit US Pain Foundation, I also hired a CFO in an effort to start fixing my mistakes. I certainly mismanaged money and budget but I can honestly say it never impacted our mission or stunted its growth. I always put the person with pain first, even if that meant failing on important responsibilities such as budgets and proper channels and board governance. Some would say I ran US Pain like a small business and not as a 501 c 3. I never received a single kickback, it would have been offensive to me and would have caused immediate severance of US Pain and a pharmaceutical. I immediately contacted the US Attorney to come forward with my wrongdoings, I was and always will be honest and fully cooperative. I was fully cooperative with Homeland Security when I was asked for US Pains financials and financial ties with the pharmaceutical industry, I complied within 24 hours and worked with them with anything they needed, I never hid behind an attorney.

As I write this today I feel as though my life is in shambles and has been ruined by my wrongdoings. My two boys are the only light in this darkness I take responsibility for creating. I find myself in a worse position than the night before US Pain was born. I have lost so many people and will live the rest of my life with a regret that is unfathomable. Ultimately, the only ones that will suffer are my boys. I will never be able to restore the time I may lose with them as a result of a jail sentence. I hurt people I love, I put my wife and boys in danger of losing our home, I put my wife in a horrible and unforgivable situation, my boys are going to suffer because of me and that guilt is so hard to bare and face. I have altered their life because of my actions in a negative way, which is the complete opposite of what I ever wanted to set out to do as a Dad. Its hard to think that I was so stupid and selfish that I didn't think what might happen to my boys by my actions. I see them change every day and to think I will miss the little things cripples me, and makes me so angry at myself that I caused it. I am asking for leniency and mercy, I know I deserve to be punished and I can honestly say I will be punished the rest of my life over this, but my boys and my wife don't deserve to be punished, I feel they need me. I am there to help my boys when they are scared at night, or when they need to be calmed down. They need me to provide for them. I was so proud today, I got to see my son Santino's first day of school going into Kindergarten, seeing him get on the bus like a big boy but it was a sad day because all I could think about was, I may not be able to see Luca's first day next year.

As I contemplate what I have done and what is happening, I see only one positive, I see only one thing I can take from this to use as a learning tool. I need to use this experience as a learning tool for others especially for my boys. I want them to understand in life there are consequences to our actions, I want them to understand they must be honest and take ownership to mistakes. I want them to learn that no matter what doing the right thing always is right and just. Facing the facts when you make a mistake is key. I hope my experience will teach others.

I take full responsibility, and I will also pay the ultimate price. I wonder if I have been forgotten for the good I have done instead of my momentary lapses in judgement, and I question if my boys will ever get to hear of my accomplishments rather than my failures. I miss helping people all of the time, I miss the work of advocacy and giving people a voice that feel they don't have one. I miss the connection I had with my family of choice at US Pain and the pain community. I think of a prayer everyday more now than ever, a prayer of asking for forgiveness of God, in the prayer we say, I **have sinned in thought, word, and deed; in what I have done and in what I have failed to do, by my fault, by my fault, by my most grievous fault;** wherefore I pray God Almighty to **have mercy on me, forgive me.**

Thank you for taking the time to read my letter and for giving me an opportunity and a voice.

Sincerely

Paul Gileno

A handwritten signature in black ink, appearing to read 'Paul Gileno', written over the printed name.

EXHIBIT B

June 25, 2019

Re: Paul Gileno

Dear Judge Bolden:

My name is Nicole Gileno. I am writing this letter on behalf of my older brother, Paul Gileno. Paul is the oldest out of the seven of us and has always been a role model. A person isn't born with a certain character; it takes years and years to become the person you are in life. Paul's character is built on love, family, values, traditions and hard work.

Paul's start in life, I can say was tough. Our mom married at a very young age to Paul and I's biological father. I have no memory of him, but Paul does. From the little I know, it's not memories worth remembering. Then came along our daddy which is the reason why our family is so close, loving and dedicated to each other. I can truly say that Paul has followed in our dad's footsteps.

Growing up in a large family was amazing. We are best friends, we are the guests at each other's birthday parties, we are each other's shoulders to cry on, we are a team. Family was always and still is the most important thing to us. He has always pointed us in the right direction, teaching us how to be respectful, work hard, make the right choices and love unconditionally. I cannot think of a time that he wasn't there for me, my brothers, sister or parents.

Paul is a wonderful person inside and out. We as a family had many traditions growing up and as we got older and started having our own children, Paul made sure we all continued the same traditions with our own families. He is a loving uncle, not only to my three children, but to his other 14 nieces and nephews. Paul wanted nothing more than to be a daddy. Finally, at 40 he did become a dad. His first son, Santino, was born premature and had to spend a month in the hospital on breathing tubes, have a chest tube and stay incubated. Paul along with his wife, lived at the hospital. He never left one day, just holding Santino's hand. Santino and Luca are lucky to have him as a dad. The joy in their eyes, the excitement they have when he walks thru the door. They love to help him cook, which is a passion of his. Might I add, he is an excellent chef and his boys are his sous chefs. Paul worked very hard as a young teenager/man. He saved all his money and opened a Specialty Italian Deli in Stamford, CT. We all, brothers and sisters worked there. We had so much fun all working together, because we were together. As time passed, Paul was injured and had major back surgery and a severed sciatic nerve. He went from working 70 hours a week doing what he loved, to laying in a bed in pain. He was helpless and in pain. Instead of feeling bad for himself, he decided, to help people with pain like him. He made that his new passion and his dedication to people with pain was amazing. He helped thousands and thousands of men, women and children. He was honored and awarded many times for his exceptional work. He pointed people in the right direction to get the help they needed.

Our grandfather who lived in Florida past away 4 years ago. Paul sat by his bedside, called each of us so our grandfather could say goodbye. When my mom was diagnosed with ovarian cancer 12 years ago, we were all devastated to the point we couldn't think straight. Paul helped us keep positive and be strong for our mother and help her fight it, even though he knew she only had a 10% chance of living. 12 years later, cancer free, she is enjoying her 19 grandchildren and I believe it is because of the encouragement and positivity Paul exemplified. Our dad had to have open heart surgery 6 years ago, a man at the time who was 300+ pounds, having open heart surgery was a huge risk. Of course, we all went together to the hospital, crying, worrying and scared of what the outcome would be. For six hours sitting in that waiting room, Paul kept our minds occupied,

telling stories of all of us when we were younger. Though we were worried, we laughed and cried thanks to Paul.

Paul is a true leader. He is a person to look up to, he is the man I would want my son and nephews to be in the future. He is the definition of love, values, family, dedication, positivity, tradition and hard work. He is a brother, uncle, son, daddy, husband and friend who is truly loved by everyone.

It is very difficult to put down on paper everything, everyone, every example of how Paul cares, helps, touches and loves. I can go on for days but these examples of how he has gotten me through some very hard times it what came to mind first.

Thank you, Judge Bolden for reading my letter.

Sincerely,

Nicole Gileno

June 26, 2019

Dear Judge Bolden,

My name is Jennifer Connolly and I am a sister to Paul Gileno. I am not sure where to begin as Paul was the oldest of 7 children and always someone to look up to especially for me.

Growing up in a home in the Bronx we had it all and nothing at the same time. We lived in the basement of my grandparents' home for many years and I do not see a family that could have been happier or prouder of our childhood and I know that we all remind each other and our children of this every day. We didn't need anything if we had each other and Paul being the oldest showed us that daily.

As adults Paul and I have become very close. Paul is the Godfather to my son, and I am the Godmother to his. Paul's love for his family is exactly what I remember we had growing up where no matter what you have if you have love you have everything. Paul lives for his family and is always there for all of us especially his wife and children who he would do anything for.

Paul is strong willed and someone who always looks at the bright side of any situation and helps all in the situation look that way too. Being around Paul in a tough time makes the situation always seem better and he is very comforting.

When I have a problem, I know who I can go to keep the situation calm and make the best of everything and that is Paul, he is very level headed and calm he never makes a situation look bad and is always there for everyone.

I have 4 children of my own and Paul sat in the hospital during all my labors making me laugh in the labor room until the arrival of my children. Not even thinking that he was interrupting his day, he was there for me and then upon my arrival coming home he always made it a point to come back to my house with dinner and to help as soon as possible.

Paul makes times for everyone without hesitation and without complaints. When something is happening good or bad Paul is the one you can count on to not only be there but to make the situation seem better.

Twelve years ago, my mom was very sick with ovarian cancer and although everyone was extremely upset and did whatever we could to help my mom out Paul was there for her and us everyday every step of the way. He was going through the same as all of us afraid of the unknown of what was happening with my mom but rather than focusing on the bad he made sure we were all ok and took charge to go with my father to every appt even if it meant leaving his home at 4am or taking away from his busy day.

The time was rough, and my father was very upset not knowing what to do or ask the doctors and Paul stepped up to the plate and kept us together and informed the entire long year we had with my mom until she finally went into remission.

Seven years ago, my father had to have open heart surgery. While we all sat crying in the waiting room waiting for the doctor to come out Paul sat with each of us trying to assure us all was ok.

Paul has 2 children of his own in which he adores. When his first son Santino was born almost 6 years ago, he was born early, and his lungs were not fully developed. I remember waiting in the hospital for Santino to be born and Paul to come out and give us the good news, instead Paul came out white as a ghost just to let us know that Santino could not breathe on his own and had to be transferred to the NICU at another hospital. Our hearts were torn apart, but as usual Paul stood strong and did not leave Santino for a minute until he finally arrived home.

We all know life goes fast and in the blink of an eye those babies turn into toddlers and then those toddlers start school and so on. Paul being the loving family man that he is lives for his family and even a day or a minute away from them will be a lifetime for Paul.

This is not even a quarter of the stories that I have about Paul, but these are some of the stories that made a huge impact on me and can hopefully give you a sense of who Paul really is.

As we know sometimes one thing happens and when we don't know someone we have no other choice but to believe that is who the person is but they are actually someone completely different.

I truly hope that this letter finds you open minded and gives you a small glimpse of who Paul Gileno is.

Thank you for taking the time to read this.

Respectfully Yours,

Jennifer Connolly

A handwritten signature in black ink that reads "Jennifer Connolly". The signature is written in a cursive, flowing style.

August 19, 2019

My name is Jennifer Gileno and I am Paul's wife. I met Paul in September of 2013 and was a divorced working mom and he was president of the foundation. I had never met someone who lives with chronic pain until I met him. I didn't even really know what it was. He suffers yet he lives and he helped people learn to do the same. He has given people who had no place to turn while dealing with pain find a place where other people know how hard it is not to give up on life.

Paul has always wanted to be a father and have a family of his own. To feel he is loved and feel he has a place to be safe. He didn't have a relationship with his birth father. He did grow up with a wonderful man who is his stepfather, but he was always searching for a home he felt was his. When he broke his back, he believed he would never see that dream come true. How could he be a dad if he couldn't run and play with his kids. He suffered through years of therapy and surgeries to be able to walk again and his dream of a family was lost until we met. We fell in love and I knew he was missing something very important to him in life and that was being a father and having a family, so we decided to start a family of our own.

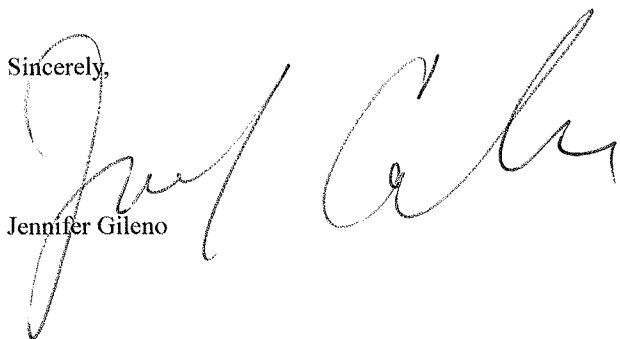
My first pregnancy was very hard. I developed preeclampsia and could not work. Our first son Santino, was born five weeks early and spent four weeks in the Nicu. When we were able to bring him home, he was on a respiratory and a heart monitor until he was five months old. He had some developmental delays that required him to be a special needs child. Santino received speech therapy, occupational therapy and required a special education teacher for his first two years in pre-school. I became pregnant with our second son Luca when Santino was five months old, again developing preeclampsia. Although Luca was born healthy, I didn't return to work and I stayed with both boys. Paul took on the provider role for our family and I believe this is where he made his huge mistake and had choices. He could not go back to his career as caterer because of the toll it took on his body and his chronic pain. He was trying to provide for a wife with two babies, one with special needs.

It was terribly wrong for him to treat the foundation as a small business and not as a non-profit for those two years. I just think he made very bad decisions. He is a great man and a great father. I also have a daughter and a stepson from a previous marriage and he loves my daughter and cares for her emotionally like she was his own. He is the father I have always wished for her and he treats my stepson the same way. He would do anything for these kids and they love him and they are his world. He is a caring and generous person who always goes out of his way to help people, family or strangers.

I'm so proud he's our daddy and that our boys have him to look up too. Not one person could work harder, be more loving than him. He's the dad he's always wanted to be here, present, and fully engaged in his boys lives. We need him. Our sons Santino and Luca need him, I need him. He was wrong and he knows it and there will be no harder punishment than he already puts on himself every day. Please don't take him away from us.

Sincerely,

Jennifer Gileno

A handwritten signature in cursive script, appearing to read "Jennifer Gileno", written in black ink on a white background.

Sage Kilbourn
13 Bradley Court, Brewster, NY 10509
s.kilbourn@live.com

Honorable Judge Victor A. Bolden
U.S. District Court for the District of Connecticut
915 Lafayette Boulevard, Bridgeport, CT 06604

Friday, June 28, 2019
Re: Sentencing of Mr. Paul M. Gileno

Dear Judge Bolden,

My name is Sage Kilbourn and I am an Environmental Educator within the state of Connecticut, where I was born, raised, and educated. I currently reside within the state of New York near my immediate family.

I am writing on behalf of Paul Gileno, who pleaded guilty to the charges of tax evasion and wire fraud on June 17th, 2019. My family and I have known Paul since October 2012 and he proved to be an extraordinary human being from the very beginning. Paul moved into our home in January 2012 during my second year of high school. He became a pinnacle feature of our small familial clan so effortlessly; so naturally, as though he was always meant to end up in our lives. Our loving and swift acceptance of Paul into our fold is the first true reflection of his character as both a person and father.

My own father is a loving man, though complex and reserved. Our relationship is spread thin across the distance of my parents' divorce fifteen years ago. I have all the love for him in my heart, but it was Paul who helped me with college applications. Paul was the one to talk me through the fine points of a job interview, teach me to cook authentic Bolognese in our small kitchen, and validate my sense of worth after the end of a romantic relationship. Paul seamlessly stepped into a parental role within my life because of his earnest love for me as a daughter.

Law must remain black and white in order to limit chaos, but there is pure beauty in the justice system's ability to see through the greyed lens of humanity. Paul is a good man who made poor decisions. He fully understands the depth of his actions and places more blame upon his own shoulders than anyone else ever could. Paul has always carried more weight upon himself so the people he holds dear can continue to breathe easy and this is no different.

Paul has lost a lot from the decisions he made – multiple facets of his career, relationships with his biological family, and respect of the public. All that I ask is that he does not lose us. Let him atone. Let him post restitution. Let him pay his dues as anyone who breaks the law ought to. I only ask that you graciously allow Paul to stay with his family – with us. Please take into consideration his clean record, steadfast character, and genuine humility.

Most sincerely,

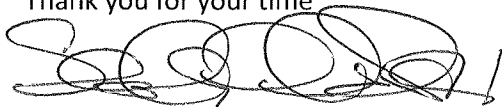
Sage Kilbourn

A handwritten signature in cursive script that reads "Sage Kilbourn". The signature is written in dark ink and is positioned to the right of the typed name "Sage Kilbourn".

Dear Judge Bolden,

My name is Shelly Olivadoti and I am Paul Gileno's ex-wife. I am writing on his behalf. First I would like to say I am shocked at what has happened as it seems so out of character for Paul. I am sure from knowing him that he is not only sorry but devastated at his actions. I met Paul in 1998 when he was an owner of a gourmet food store, he was a chef and a caterer on the rise. We were married in January of 2000 and were married for over 10 years. In 2003 while he was working a catered he severely hurt his back. In 2003 he had multiple surgeries to help his back and pain but it seemed things only got worse. During this time he had to stop working, became severely depressed and his pain escalated. He went through lots of painful physical therapy and had multiple procedures to try and help him relieve the pain. Nothing worked and our marriage was strained. After 3 years of this Paul decided to start a support group to help people with pain. He started to use our money to start this support group. As his support group grew he then decided to start CT Pain Foundation. He started to work on this project every moment and he used our money to run it, he used our money to do what was needed to make it something that could help people. He was obsessed with it. He would say the more he does the better he feels and that he has a purpose. Sadly this put a strain on our life as he was funding this project with our money. He grew it from nothing and did this without funding for over 4 years. Eventually it would become US Pain Foundation. His dedication to helping others who were suffering was amazing to see but at same time sad because we drifted apart. I know Paul is a good man and I am sure an amazing dad. I know he is a dedicated person always looking out for others. I hope this letter helps you understand what a man he is and that all he wanted was to help others and make change not only for himself but for others. I. D.o.n.t know how much we spent over those 4 years, I know our house was a warehouse, an office and a hub for people with pain. I also know he did not get any funding those years and it was only because of his hard work, day and night 7 days a week that US Pain was born and funded. Please be lenient on your sentencing of Paul as society is better off with him in it then in jail or away from it. I know him well and I am sure he is devastated and would want to make sure others learn from his mistakes.

Thank you for your time

A handwritten signature in black ink, appearing to read 'Shelly Olivadoti', written over a horizontal line.

Shelly Olivadoti

June 26, 2019

Dear Judge Bolden,

Subject: Character Reference for Paul Gileno

I am writing on behalf of Paul Gileno. My name is Maria Gileno. I am an NYC School Teacher, but I am currently on Child Care Leave. I worked for the DOE for about eight years when my husband and I decided it was best that I take a Child Care leave, so I can be home to raise our children. I am grateful that I have this opportunity to stay home because I will never get this time back with my children. These last three years have gone by so quickly and my children have grown up so much. I did not want to miss out on the big moments, but also the everyday small moments that mean so much. Speaking of years going fast, I have known Paul Gileno for about seventeen years, and he is my brother-in-law for seven of those years. Paul has been in my life since I was seventeen years old. He watched me grow from a High School Senior, through College, Graduate School, my teaching career, as well as when I became a wife and mother. Paul was always there, supporting me and cheering me on through great times and not so good times. He encouraged me every step of the way to reach my goals. I cannot thank him enough for the most important thing, which was his presence and for being who he is- a thoughtful, caring, strong, kind-hearted person. He is loved dearly by his family.

Paul is the oldest of seven children, so he took on the role as the strong one, who always looked out for everyone. There are three big moments that stand out to me that showed his strength through difficult times. My mother-in-law is a cancer survivor and when she was diagnosed with ovarian cancer it was one of the most difficult times in our lives. Paul made sure to attend doctors appointments, chemo therapy, surgery, and made sure to visit or keep in touch with his siblings, all the while he was going through his own emotions about his mother's diagnoses. Another moment was when we were in the waiting room during my father-in-law's open-heart surgery. He was the shoulder to cry on and an ear to listen. He made sure to sit with everyone checking in on them. He was always so comforting making sure everyone was okay. His strength and optimism helped us get through these most difficult moments in our lives.

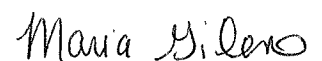
Paul had to be strong as a son and brother, but it was when his first son was born two months early and with heart complications that caused his son to stay in the hospital for a few weeks. This time, Paul had to be strong as a husband and father. His son was born just a few days before Christmas and the thought of them not being able to bring their son home and spend Christmas together truly broke my heart. I got them a small tree so they could be together at the hospital and it would still feel like Christmas. They appreciated my small gesture. It was sad that they did not spend Christmas at home, but they did spend it together in the hospital and that is what mattered; they were together.

Paul is very thoughtful and caring with a kind heart. Like I said before, he was always there for my family and I. When I had my C-sections, I was scared and nervous. Paul was there to greet me off for surgery, waited long hours in the waiting room, and was there post surgery to make sure how I was feeling.

Then, he visited multiple times during my hospital stay. His presence and comfort meant a lot to me. His smile and hug always made me feel like everything was going to be okay. He is very sincere. Also, when my grandparents passed away, Paul made sure to be there at the wake showing his love and support to my family and I. About a month ago, our dog passed away from Stage 4-Kidney Disease. It was a shock to us because by the time symptoms showed, it was too late. Not only did Paul reach out by phone to see how we were doing, but he even visited. He wanted to make sure to see his nephews and niece because he knew how hard our dogs loss was on us all. Another time he was caring and thoughtful was when he heard I was not well during my pregnancy. He left Pedialyte and saltine crackers on my porch, so I would not get dehydrated. One early morning, when my husband was at work, my son; a few months old at the time, was very congested and coughing. Paul came over to check on us and stayed awhile to make sure we re okay. He is the first one to arrive at functions to lend a helping hand or to be there to keep the person company. I will never forget all that Paul has done. These are just a few examples, but he has been there without hesitation.

Paul is a family man, who has always been strong, caring, and kind. He is a caregiver and has always looked out for his family. He is an amazing brother, brother-in-law, uncle, son, cousin, husband, and father. I mentioned about time going by quickly and how life is fragile and unpredictable. We will never get this time back, moments and memories-big and small will be made. I saw how fast my own children grew up within these few years and I have been with them almost all day long. It is important that Paul is there throughout these moments with his family, especially his children, during this crucial stage in their life of growing up. Paul should be there for his children: on their first day of school and first time riding the school bus, school events, sports activities, helping them with their homework and nighttime reading, to see the excitement on his children's face and how proud they are when they learn how to read or figure out a math problem, to teach them how to ride a bike without training wheels, to be there to hold their hand when their nervous for doctors/dentists appointments, to hold them at night when they are not feeling well, to cook their favorite meal, to see them lose their first tooth-to watch them grow up and become their own person. Paul should be there for his older children as they take on life as an adult and to be there for them during their chapters in life, whatever that may be. Paul should be there for his wife and to show her she is not alone during this journey called life because they are a team. I know how grateful I am to have my husband by my side, showing his love and support, and being there through every experience together. It is important that they are together as a family through everything. It is my turn to show love and support to Paul and his family, and to let him know everything will be okay. Thanking you in advance.

Sincerely,



Maria Gileno

Kim and Frank Ward
122 Highview Drive
Carmel NY 10512

June 27, 2019

RE Paul Gileno

To The Honorable Judge Bolden,

I am Pauls aunt Kim, and my husband Frank, is his uncle. We are both retired. I am retired from a direct sales company, and my husband from the FDNY.

Paul was our very first nephew, and is truly a kindhearted person. We have known him almost all of his life. He was just a little boy when he came into our family, and from the moment we met him we were immediately in love.

I remember when he was a young boy how he would go to the neighbors house to rake the leaves, or shovel the snow, just because he knew that they needed help. Then when Paul was a teenager he worked at the neighborhood corner store, and everyone that walked into the store would always tell us how pleasant and kind he was. Growing up, Paul was, and still is, a big brother to six brothers and sisters, who adore him as much as we do.

Paul then met the love of his life, his wife, Jennifer. Paul and Jen now have two beautiful little boys, Santino and Luca. When we look at their adorable faces, we see Paul as a little boy. Paul is a wonderful, and loving husband and father, and was always someone that his brothers and sisters looked up to. He is a wonderful man and always puts others before himself. He is kindhearted, affectionate, and a loving man, and will go out of his way to help anyone in need at anytime.

Sincerely,
Kim and Frank Ward

Untitled

Joseph A. Gileno

June 25th, 2019

33 Reynwood dr. Brewster, NY 10509

646-533-0113

To Honorable Judge Bolden,

I am writing this letter in reference to Paul Gileno. Paul is my older brother, that being the eldest brother of myself, four other brothers and two sisters. Growing up in a home with so many siblings and our two parents is what created the unbelievable bond we all have. With that being said, Paul was always at least 8 years older than his other brothers and sisters. When Paul was becoming a young man around the age of 16+ his other brothers were ages 3, 6, and 8 and sisters 12 and 9. Instead of Paul being the normal teenage adult like so many, his time spent in those years were being around all of us as my father worked countless hours. His time spent with us included making videos of his brothers and sisters being kids, countless videos of holidays together, and creating memories for our whole family that we still today watch and cherish. He did all this as a regular teenage kid not knowing what it would create for us years later. He did all of this as a teenage kid while most others were hanging out on the streets of the city. As I've grown into a family man with 4 children myself, I look back at that in amazement. As Paul was the oldest, he was the first one of us to enter the workforce. I remember Paul working as far back as I can remember. He was the

Page 1

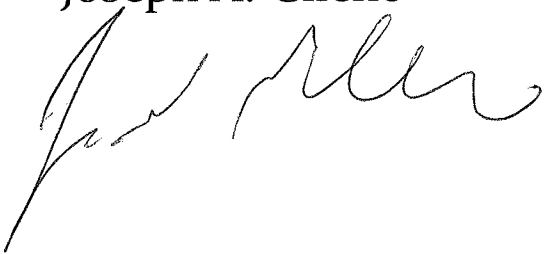
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boy around town who had all the newspaper routes, landscaping work , deli work around the corner, etc. Paul's ambition, drive, and tenacity over the years has definitely overlapped onto his siblings and I can honestly say I thank Paul for much of the work ethic I have today. He is one of the hardest workers I have ever met and I can say that with zero hesitation. As Paul got older, even at an incredibly young age of 22 , he opened up his own business. He owned a catering/ fine food establishment . Myself and my other brothers and sisters would go there to work and help out. He would go into work at 6am and leave 7pm usually 6-7 nights a week. I've seen Paul first hand give so many people oppurtunities. Ive seen him train so many people in the food industry. He is the perfect example of someone giving someone a chance. Paul ran his successful food business in Connecticut until he had hurt his back. No matter the pain Paul was in from his injuries, he would never let it ruin him. He would help anyone or try to guide anyone who was in similiar situations. When my mother had gotten sick with cancer, Paul was the one who kept all of us together. It was an extremely difficult time for everyone, and no matter the pain issues Paul was having, all he did was comfort all his brothers and sisters, and father. He was living over an hour away at the time, but made sure he was there until the night was over and there when we all woke up. Of all the great success Paul had throughout his life, his biggest achievements are his two boys. He is bringing up his boys with the same love, and devotion I seen all my life. The old days I remember , of Paul helping grow up his brothers and sisters

Untitled

without even knowing it have translated now over to his boys. Paul is a dad, just like he was as a boss, someone who listens and guides without hesitation and frustration. I myself, can learn a lot from him actually. He is a man who without fail, who will do whatever he possibly can, whole heartedly, to help someone to the best of his ability. I was born and Paul was there, I walked, talked, graduated, had kids, moved, etc and Paul was there. And the Paul I know is a man of respect, fairness, loving, caring, trustworthiness, sympathetic, and helpful. I've seen Paul first hand touch so many lives without prejudice. I am honored he is my brother, and hope this letter serves well.

Respectfully,
Joseph A. Gileno

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

Joseph Grillo
39 Jessup Lane
Stony Point NY 10980
845-893-3880
Joeyg253@optonline.net

6/22/2019

RE: Paul Gileno

Dear Judge Bolden,

I am writing on behalf of my Nephew Paul Gileno. I know Paul has pleaded guilty to his charges. I am writing to offer a glimpse of who Paul is, and that is someone who is far more than the offense he pled guilty to.

As a young boy Paul was always bright and energetic and found a special bond with his Grandfather, always anxious to go with him to work when the opportunity arose. There he learned from him the value of hard work, being the best he can be and provide a valuable service to others. Paul became the oldest of 7 siblings and was always of assistance to his parents in helping with things that needed to be done for them to raise the family on one income. Paul went on and built a successful catering and food service business until he had injured his back.

Paul always looked forward to going to Florida to visit his Grandfather and his wife after they retired and always welcomed them to stay at his home when they came up from Florida to visit the family. Paul always said he learned to be good host from his Grandfather. His Grandfather saw and was proud of the man Paul had become and always said they broke the mold after Paul was born. They had a special relationship. When Paul's Grandfather fell ill and needed hospice care, Paul came down to stay with me and his Grandfather at Hospice. I'll never forget Paul asked permission to stay overnight at hospice and be by his Grandfathers side, he felt he would feel his presence and know that Paul was there for him until the end. Paul also flew back down to Florida and attended the church service and military funeral after he had passed. Afterwards Paul helped to arraign a mass service for his Grandfather back at home because he knew most of the family couldn't make it to Florida and he wanted all of his family to have the opportunity to be at a service for his Grandfather. It turned out to be very nice gathering. He welcome everyone to his home afterwards and was quite the host his Grandfather taught him to be. Paul has become a loving father and husband who is truly devoted to his family.

Your Honor, thank you for taking the time to read to learn a little bit about Paul. I realize how significant the possible sentence could be. I hope that you will find Paul's true character and work to warrant a low sentence.

Sincerely,

Joseph Grillo

A handwritten signature in black ink that reads "Joseph Grillo". The signature is written in a cursive style with a large, prominent initial "J".



①

On this day I want you to know that you are a very special person

Dear Judge Bolden,

my name is Diane Gileno and I am Paul Gileno's mom. Paulie has made my life a joy from the minute that he was born. He was a perfect baby and little boy. He was my whole world. Paulie had a rough start in life, but together we were so happy.

When Paulie was 5 years old, I met my husband, Joseph Gileno. He is a loving man and he loved Paulie from the beginning. We got married and he made Paulie his own. We never used the word stepson or stepfather, only father and son.

Paulie is the oldest of 7 children and we had a very happy life.

His younger brothers and sisters



(2)

On this day I want you to know that you are a very special person

look up to Paulie and adore him.
Putting all our children through private school was a struggle and my husband had to work two jobs. Paul was there to help me with chores and watching over the children for me.

When Paul was 13, he decided to work a paper route before school and to work in the corner deli to help the family.

While in school, he played baseball and football until his asthma became a problem.

He went to Manhattan College, but decided he wanted to be a chef.

He worked while going to school as a waiter in a catering hall.



On this day I want you to know that you are a very special person

working all weekend and after school.

At 23, Paul opened his own deli and catering business and worked long hours, seven days a week. All his siblings helped out and he had such a successful business.

During one of his catering jobs, Paul had an accident and cracked his spine. He was practically crippled and needed surgery.

Being bed ridden and so depressed, Paul decided to help others that felt useless and depressed like he was. He spoke to people with disabilities and encouraged them with his loving ways.

He sent many children that have various disabilities to Disney World



On this day I want you to know that you are a very special person.

or he had them meet their special sports figure.

Paul gives encouragement to everyone. I, myself, had cancer and Paul was there with every chemo treatment to help me to think positive. He was there for his dad when he woke up from major heart surgery to let him know that everything is okay.

Paul is the father to two beautiful little boys, who love him so much. Together with his wife, Jennifer, they teach the boys to help cook and plant and all the wonderful things in life.

Your honor, I am not very good at expressing my feelings and putting



On this day I want you to know that you are a very special person

my son has touched so many peoples
lives with his love and kindness.
I only hope that I was able to
help you understand Paul's
wonderful character.

Respectfully yours,
DiAnne Gileno



Please always know that I love you more
than anything else in the world.

Dear Judge Balden,

my name is Joseph Gileno and
I am Paul's father. I don't know
where or how to begin, and, your
honor, this is the most difficult
thing that I have ever done.

Paul was 5 years old when I
met him and his younger sister.
Paul was a very happy/sad little
boy. He was very happy with his
loving mother but very sad when
his abusive father came to
pick him up. That sadness was
short lived because within 18 months
his mom and I were married
and his father stopped coming.



Please always know that I love you more
than anything else in the world.

Paulie became very happy with his new life and was eager to help me, his mom and his new family. He was such a hard working, energetic young boy, helping around the house and helping with his 6 younger siblings.

He worked at a young age, delivering newspapers before going to school. While at Cardinal Spellman high school, he played football and spent a lot of time afterschool helping teachers, students and faculty.



Please always know that I love you more
than anything else in the world.

He worked as a busboy and
waiter on weekends, always
working so hard. He set a great
example for his younger brothers
and sisters with his kind ways
and great character.

He went on to Manhattan
College and received an Associates
Degree but decided to work in
the food industry and opened
his own store and catering
business. He worked long
hours until his tragic
accident when he cracked
his spine and severed his



Please always know that I love you more
than anything else in the world.

nerve. While depressed,
bedridden and feeling useless after
his surgery, Paul thought to help
others in his situation. Along the
way, he has helped so many
people with chronic pain.

My son has a heart of gold and
means the world to me.

Your honor, Paul has made a bad
error in judgement, his fate is
in your hands. I can only hope
and pray that you see the goodness
in my son that is there.

Respectfully,
Joseph Gileno

July 3, 2019

Dear Judge Bolden:

My name is Andrew Gileno and I am Paul Gileno's youngest brother, the youngest of the 7 children in the family. Paul has always been and still is someone I look up to. Till today, he helps guide me in the right direction when ever I need help from him. He gives advise as if I was his son and what the right thing to do would be.

As far back as I can remember, Paul always had a passion for the food business as so do I. When I opened my own deli, Paul was there to help me because he had the experience from his business. He dedicated his time to me day and night to make sure I was up and running.

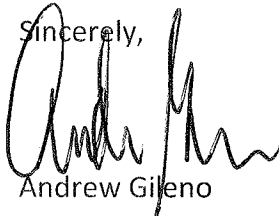
When I was born, Paul was a teenager. My mother always tells me how Paul helped her so much with me when I was a baby. Paul has that natural quality for helping people. He enjoys helping people. I once attended an event with Paul, Points for Pain. He helped a boy Tyler, who was representing his mother and her ongoing pain. The NY Yankee's honored him at a game and he threw out the first pitch.

Paul is a wonderful father to his boys, Santino and Luca. They adore him tremendously. They love to help him cook at home. They wear an apron and chef hat and say " I am just like my daddy". The love he has for his wife and children is so wonderful because he always wanted to be a father which he became later in life.

It is very hard to explain all the wonderful things Paul did to date. He has always been a role model to myself, brothers and sisters. He is a wonderful uncle to my daughter. He is the example of a great son to our parents. His love for people, his family and friends is not measurable.

Thank you for listening.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Gileno". The signature is fluid and cursive, with a large initial "A" and "G".

Andrew Gileno

To: The Honorable Judge Bolden

My name is Michael Gileno and I am one of Paul's younger brothers. We come from a very large and a very close family. Paul is the oldest of us seven children and he is the "rock" of our siblings.

Paul is a wonderful person. He does anything to help other people and always goes out of his way for his family. He is all about his family and keeping everybody close all the time.

Growing up I always looked up to Paul. He was always a role model for me and my brothers and sisters. Now that we are all grown up with families of our own, I still look up to Paul as a role model. Paul is always able to keep calm and comfort his family, even in the worst of times. My mother is a cancer survivor and I remember when we got the news my family was distraught. He held it together for his family and kept positive. He helped us all stay positive and was there every minute and I honestly believe he was a major part of my mom's

recovery. That is just one example, there are endless more.

Paul is a great father and a loyal husband. He has two beautiful young boys Santino and Luca, also two step children Sage and Jordan. Paul is the person that everybody wants to be around, including his children, they adore him and he adores them. He goes above and beyond for his children as well as everybody else.

It is my sincere hope that this letter is taken into consideration and everybody can see the real Paul, a loving father, brother, son who is very selfless and has a family at home who really needs him.

Respectfully, Michael Gileno

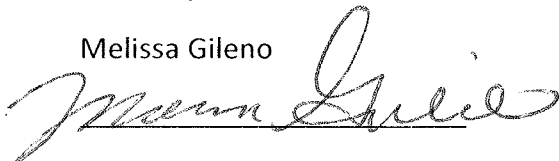
Melissa Gileno
33 Reynwood Drive
Brewster, N.Y. 10509
646-522-1425
June 25, 2019

Dear Honorable Judge Bolden,

My Name is Melissa Gileno and I am married to Joseph Gileno brother of Paul Gileno. My residency along with my husband and children for the past five years has been in Brewster, Ny. I have known Paul Gileno for fourteen years now and have nothing but great things to say about him. He is a dedicated family man with two small loving children and beautiful wife. He would do anything for his family or someone he just met. Him being the oldest of seven siblings he has always from what I have seen been there for them unconditionally. Me being an only child and entering this large loving family is amazing. To see their bond for one another and watching that closeness be shown and taught to our children is remarkable. Paul is a fabulous husband, father, uncle and someone I am happy to say is more of a brother to me than a brother in law. He is always making my children and myself laugh and feel comfortable. He is tremendously involved in showing support for my children from going to my two girls dance recitals to cheering on my two boys at their baseball games. Even pitching in and making soup for my sons travel teams snack table because I am running around trying to get other things done for it. Anything he can do to help his family he does his best to accomplish. I am thankful for the time you have taken out to read my letter.

Sincerely,

Melissa Gileno

A handwritten signature in cursive script, appearing to read "Melissa Gileno", written over a horizontal line.

June 30, 2019

Dear Honorable Judge,

My name is Tracy Michaud and I am writing this letter on behalf of Paul Gileno. I am Pauls' sister-in-law and the sister of his wife Jennifer Gileno. I have known Paul for over six years. When my sister and Paul met, I knew they were destined for each other. Both have been through so much in their lives and I have never seen two people happier together.

I know there are many adjectives that people can use to describe a person, but that number for Paul is endlessness. He is and has always been the most caring and loving person I have ever meet. I have come to see that Paul is tirelessly hard working, often staying late at work to in order to provide for his family. His sons truly mean the world to him. Their eyes light up a room when they see their father. He has a love and connection with them that is forever unbreakable. Paul has accomplished so many great things in his life, but his best accomplishment is the family he has grown with my sister.

Paul has taught me no matter what happens in life that family always comes first. Paul has welcomed mine into his life as if we have known him forever. He truly is the definition of a wonderful human being and I have the greatest respect for him as a person.

As I write this letter, my heart breaks for everyone involved. I understand the seriousness of this matter however; I hope the court will show some leniency and allow Paul to stay with his family. While it is unfortunate that he has made some bad decisions, thus resulting in this case, it is no surprise to me that Paul is ready and willing to accept responsibilities for his actions.

It is my sincere hope that the court takes this letter into consideration at the time of sentencing. Despite the current situation, I still believe Paul Gileno to be a moral individual, a valuable member to the community, and a wonderful father and husband. Thank you for your time.

Sincerely,

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

Tracy Michaud

Your Honor Judge Bolden,

My Name is Steven Gileno, I am one of Paul Gileno's younger brothers. We are a very large and close family, of which Paul is the oldest of seven. From as far as I can remember Paul is the person we have all looked up to. He has all the great qualities every person should have. He is a great father, son, brother, husband. He puts everyone first and is there for you in a heartbeat. For me, Paul has been a great role model and someone I try to emulate. Paul has always been a very hard worker, and taught us that when you work hard your payoff will come back even greater. From a young age Paul had a very successful business that allowed me and my siblings all to work together.

this was a great time in our lives with so many great memories. Still to this day we all tell stories on end and talk about the great times we had. As we all got older, and started having children of our own, we are able to pass along the great memories, along with the traits and qualities we learned from our older brother. Paul is a very devoted husband and father. He is the type of father who will do anything for his children. The type who will dress up as Sesame Street characters on Halloween along with his children while we all sit on side lines and laugh and make jokes. But, that is Paul and he would do anything for his children and everyone else for that matter. Paul has done so many good things over the years for so many people. I would

like to say how proud and honored
I am that Paul has paved the
way for all of us. He is one in
a million

Respect fully,
Steven Gileno

June 21, 2019

Elissa DeLuccy
39 Hudson View Hill
Ossining, NY 10562

Honorable Victor A. Boden

Dear Judge Boden,

I am writing on behalf of Paul Gileno whom I have known his entire life.
His mother and I are first cousins.

Paul is the oldest of 7 children. Growing up, he helped his parents look after his brothers and sisters and was always there for all of them with a helping hand. Now that Paul has a family of his own, I have personally seen what a dedicated, loving father he is to his two young sons and has carried on the strong family values he grew up with. Paul is kind, generous and considerate and has always had the respect of his family, friends and colleagues.

Our entire family is dedicated to giving Paul all the emotional support he needs and seeing him through this difficult time.

Thank you for your time and consideration.

Sincerely,

Elissa DeLuccy

A handwritten signature in cursive script that reads "Elissa DeLuccy". The signature is written in black ink and is positioned below the typed name.

Judge Bolden,

I am writing on behalf of my eldest cousin Paul Gileno. As the oldest of 12 cousins in a generation, Paul has always exemplified a family man and kind person. He'd always put his family before himself and would give you the socks on his feet if you told him you were cold.

It takes a really big person to open their home to anyone and Paul always has. Whether it be Christmas Eve dinner or summer BBQ, he would treat everyone like family. The circumstances surrounding Paul do not define him as a person but his character does. We all wish we could change certain decisions we've made in the past and I'm sure Paul isn't an exception. Please take these words into consideration when you meet him.

Cousin Frank n Jess

July 28, 2019

Lawrence & Ann Krochko
727 Center Meadow Lane
Danbury, CT 06810

Dear Honorable Judge,

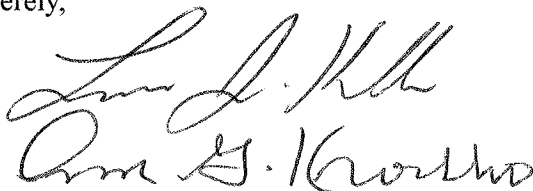
Our names are Lawrence and Ann Krochko and we are writing this letter on behalf of Paul Gileno. We have known Paul for over six years and we are his mother and father in law. He is married to our daughter Jennifer Gileno.

We have come to accept Paul into our family knowing him to be a loving and caring man to our daughter and grandchildren. He has been a devoted father and shown utmost respect to myself and my wife as in laws and as a person. He has accepted us into his family with open arms and he has shown hard work and dedication and is a loyal father.

We understand fully what he did was wrong and we feel that he knows what he has done was wrong as well. We are hoping that you can show leniency in his sentencing on behalf of his two young boys Santino and Luca and his wife Jennifer. He has shown great remorse for what he has done and is willing to accept the consequences of his actions.

Since we are both retired we are able to be around Paul and his children quite often. We have seen firsthand how involved he is with us, his parents, siblings and many nieces and nephews. We have much respect for him as a human being. We are all very hopeful that he will not have to be away from his children. Thank you very much for your time and consideration of this letter.

Sincerely,

The image shows two handwritten signatures in black ink. The top signature is for Lawrence Krochko, and the bottom signature is for Ann Krochko. Both signatures are written in a cursive, flowing style.

Lawrence & Ann Krochko

Dear Judge Bolden,

My name is Lynn Hill, Paul Gileno is my nephew. I have known Paul since he was about 4 years old. Paul was a very shy child when I first met him due to some abuse from his biological father. My brother Joseph Gileno fell in love with Paul's mom Diane, Paul & his younger sister Nicole. Joey & Diane got married and had 5 more children. Joseph Gileno adopted both Paul & Nicole. Paul came out of his shell very fast and became a very loving child, he was always looking to help out with his 6 younger siblings, being Paul was the oldest of 7 children, they all looked up to Paul. When Paul finished College, he decided that he wanted to work in the food industry and opened up his 1st place A+S Foods. Paul was very successful, until he had an accident

that left him in a lot of pain. Paul went for back surgery because of all the pain. He was out of work for many years.

Paul has also helped many people over the years with their pain issues. Along the way Paul had made some mistakes.

My nephew Paul is a great husband + father to his 2 young sons Santino and Luca.

Elf Paul is not working he is always doing something with his 2 sons. The boys look up to him like he is the best thing in the world, like they should.

Elf anyone in our extra large family ever needed anything Paul would always be the first one there.

I can't say enough about my nephew Paul, who I love and respect so much.

Sincerely,
Lynn Hill

EXHIBIT C



NEW CANAAN
PSYCHOTHERAPY
ASSOCIATES

51 Locust Avenue - Suite 304
New Canaan, CT 06840
Phone 203-966-6467
Fax 203-966-6807

August 15, 2019

Judge Victor Bolden
Brian McMahon Federal Building
915 Lafayette Blvd., Suite 417
Bridgeport, CT 06604

Re: Paul Gileno

Dear Judge Bolden:

I am writing this letter to offer you my personal and professional perspectives on Paul Gileno in advance of his sentencing. I am a clinical psychologist in private practice serving the pain population. For the past twenty years I have been a consultant to several pain management medical practices. I was a contributing columnist for Pain Pathways Magazine ("Ask the Doctor") from 2012-2018. In addition, I have developed a peer support group training program for the pain population and have trained and supervised clinicians of all disciplines in the psychological aspects of pain.

In 2007 Paul Gileno was referred to me by his pain management physician for treatment of depression, anxiety and difficulty adjusting to the life changes resulting from severe, chronic pain. At the time we began treatment, Paul was in acute emotional distress. He felt hopeless and helpless to redefine his life, and he expressed the belief that his life no longer had meaning. He was socially isolated, estranged from his extended family, and extremely dependent on his wife. Our work together focused on emotional expression and resolution of feelings as well as on pain management skill development. Paul was quite receptive to this approach and actively participated in learning the cognitive/behavioral methods of managing pain. Over time, he became more active and engaged and less depressed and anxious.

At that time, he was struggling with his worker's compensation insurance provider which was denying him treatment services and/or authorizing treatment but denying payment to providers. Paul had an attorney who was ineffectual in advocating for him. So Paul petitioned the Worker's Compensation Commissioner for permission to represent himself. This was allowed, and he was able to negotiate his own settlement and get all of his providers paid. During this fight for his rights, the "old Paul" surfaced. Prior to his injury, Paul was a man of decision and action. He ran his company efficiently and enjoyed the problem solving aspects of his work. In 2007 he applied this experience to solving the problem of his injury settlement and then turned his attention to the larger pain community. He stated at the time that if he was having this much difficulty with the worker's compensation system, so were many others. He started Connecticut Pain Foundation in order to assist people like himself with getting proper care,

accommodations, advocacy, services and support. His work with the foundation gave his life new meaning and purpose.

Because Connecticut Pain Foundation was attracting participants from all over the United States, it evolved into US Pain Foundation in 2011. During this time, Paul continued in pain management/psychotherapy with me and also included me in an advisory capacity for US Pain. As US Pain grew and developed, Paul became more energized and focused. However, it was clear to me from the onset that he was running this non-profit foundation as a private business. We had many conversations about this since I worked for many years in non-profit agencies and have served on non-profit boards of directors. Paul agreed in principle with doing things the right way, but he often took action steps before setting the proper structure in place. This caused a rift in his marriage since he was using personal money to fund the foundation. I spent some time with him and his wife discussing this, and they eventually divorced with this issue as one of the problems in their union.

Paul Gileno is a man of action. He is entrepreneurial, quick-thinking, decisive and enthusiastic about helping others. He has been impulsive, making decisions or promises without thoroughly thinking through the consequences. He is very aware of this patterns, but until quite recently he acted on the belief that everything could be worked through after the fact. He recruited the US Pain board of directors based on his emotional connection to them rather than on their professional expertise in areas necessary to running a non-profit organization. To his credit, Paul did initiate a review of US Pain finances as well as policies and procedures because he recognized the necessity of professionalizing the organization. Unfortunately, he should have attended to the structure of US Pain at the very beginning of the foundation. He has given every indication to me that he understands his mistakes, takes responsibility for them, and has great remorse for the effect of his actions on US Pain members and his family.

I would like to emphasize the great deal of good that Paul has done for a great many people. He has connected the larger pain community to providers, advocates, support services and to each other. He has educated persons with pain, their families and their providers. He has effected legislation regarding medication and accommodations. Through my work with the pain community, I have witnessed first hand the positive effect that Paul has had through his foundation work since 2007. My hope is that you will consider all of this good work and the fact that Paul's motivation from the beginning was to help others. His heart is big and his intention has been to serve others, not himself.

Thank you for considering my opinion as you formulate a sentence for this good man.

Respectfully,

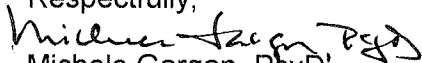

Michele Gargan, PsyD

EXHIBIT D

William H Paetzold

From: Jeannette Rotondi <jrotondi03@gmail.com>
Sent: Wednesday, August 14, 2019 12:59 PM
To: William H Paetzold
Subject: Re. Paul Gileno

To whom it may concern,

I am writing on behalf of Paul Gileno. I ask the court to take into consideration the good he has done for so many with chronic pain and illness.

I personally live with several chronic pain conditions due to a genetic connective tissue disorder. Without Paul and U.S. Pain Foundation, I firmly believe I'd be dead. He gave me a purpose again, the opportunity to be an ambassador and advocate, through U.S. Pain Foundation. He reminded me that we all have something to offer.

Please submit anonymously. Thank you.

William H Paetzold

From: Jacki Drexel <jaclyn.drexel@gmail.com>
Sent: Friday, October 4, 2019 9:59 AM
To: William H Paetzold
Subject: character letter for Paul Gileno

To whom it may concern:

I am writing this letter as a character witness for Paul Gileno, and I'd like to take this opportunity to share the impact U.S. Pain had on my life while under the leadership of Paul Gileno.

First, in some respects, U.S. Pain helped to give me my life back. My disabilities left me questioning if I could contribute worthwhile ideas in any capacity. When others in the organization pushed to silence me, Paul encouraged my out-of-the-box thinking. My confidence grew under his leadership and I was able to build my Light Up The Landmarks concept into a successful awareness campaign with his encouragement.

It is important to note that US Pain was started as a local support group, without the intention of it becoming a large-scale nonprofit. Though there are universities that offer masters' degree programs in nonprofit management, the steering powers of the organization - past or present - are lacking in this specialized training. Even with the best of intentions, the lack of training has left the organization and all of its leaders vulnerable. The disorganized infrastructure meant that many representatives traveled and used business credit cards without properly documenting expenditures.

Though the organization is a non-profit, it was never run like a typical organization. Paul wanted the heart of the organization to be people with pain advocating for other people with pain. This meant that using typical business constructs was difficult when defining available hours and expected work loads. The infrastructure necessary to make adequate and educated governing decisions has continued to be lacking, even after Paul's resignation. I believe that Paul feels responsible for all of the organizational mistakes that were made, even beyond his misappropriation of funds. He has purposed, through his guilty plea, to ensure others are not burdened financially or emotionally as a result of these mistakes.

It is my understanding that several issues have been misrepresented, whether to the court or to the remaining employees and members of US Pain, I'm not completely sure which. For example, some of the funds in question were "misappropriated" in two different locations at the same time. Any funds that were not accurately documented by any approved signor were added into the mounting number of missing funds. Likewise, several reports suggest that all funds received by Paul's family were done so fraudulently. His sister and daughter were actively involved and hard-working members of the US Pain family. Some of his family even continued their work for US Pain beyond the date of Paul's resignation. Finally, Paul's character has been assassinated in association with the patient prescription co-pay program. The board and directors seem to claim complete ignorance regarding the program, as if they never knew it existed. This baffled me as I attended meetings where the program was discussed at length, including details regarding what it would cover and what the amounts of eligibility would be.

These concerns have caused me to struggle with trusting the new leadership regime. Specifically, their moral construct seems questionable in connection to their willingness to let Paul take responsibility for mistakes beyond his own. In contrast, it means a lot to me that Paul is taking responsibility for his actions. I think it speaks volumes that he is willingly taking the fall for all involved above and beyond his own missteps. By taking this plea agreement, Paul is attempting to protect the board from further investigation with the hope that they will NOT be held responsible for any of the misappropriated funds or mistakes. Regardless of the past, I find his present actions to be admirable.

Sincerely,
Jaclyn Drexel
jaclyn.drexel@gmail.com

—LW—

Lynn R. Webster, M.D.

1285 3rd Avenue
Salt Lake City, UT 84103

July 11, 2019

Judge Bolden
c/o William H. Paetzold
Moriarty, Paetzold & Sherwood
2230 Main Street
Glastonbury, CT 06033

Dear Judge Bolden:

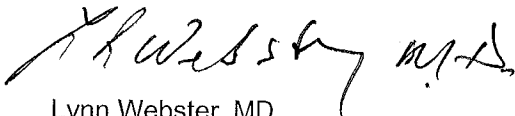
I write in support of Paul Gileno. While I cannot speak to the legal issues in which he is involved, I can speak about the person who has spoken for millions of people who suffer from chronic pain.

I have known Paul since he started the U.S. Pain Foundation as a local organization in 2006. Three years before, when Paul was 30 years old, he suffered a workplace injury that had broken his spine and severed his sciatic nerve. As the U.S. Pain Foundation's web site points out, Paul was one individual in search of support, community, and hope. Since 2011, the foundation he founded has provided education and advocacy for people nationwide who are living with chronic pain.

Paul has been recognized as a hero among a population of people who are often ignored. I personally recognize him as such, too. His hard work has been recognized by multiple reputable organizations.

I hope you will take into consideration the positive contributions Paul has made to the lives of people in chronic pain. His humanity and hard work have provided hope for so many people. Thank you for your time and consideration.

Sincerely,



Lynn Webster, MD
Vice President, Scientific Affairs
PRA Health Sciences
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LRWEBSTERMD@GMAIL.COM



rsdsa
SUPPORTING THE
CRPS COMMUNITY

July 11, 2019

To: The Honorable Judge Bolden


From: James W. Broatch, Executive Vice President, Director

Subject: Personal Recommendation on behalf of Paul Gileno

I have known and worked hand-in-hand with Paul for many years as we were both leaders of patient advocacy organizations in Connecticut for people suffering with intractable pain. Under Paul's leadership, the US Pain Foundation became a national leader in advocating for better access for care for people in pain. The US Pain Foundation organized coalitions across the United States to battle insurers who changed pharmaceutical formularies in the middle of a plan's year or forced people in pain to fail (not respond to) two medicines before they could receive the medication which their physician had originally prescribed. The US Pain Foundation trained people with pain across the country to become support group leaders in underserved areas.

For the past four years, RSDSA and the US Pain Foundation with two other organizations have sponsored a camp for children in pain at the Center for Courageous Kids in Kentucky. Children from across the country and even from the country of Georgia attended this free camp. It was a life-changing experience as the campers felt like kids again for the first time since the onset of their illness.

As a person suffering with Complex Regional Pain Syndrome (CRPS), Paul personally experienced the suffering endured by people with chronic pain and he became an empathetic and skilled advocate on the national level. His leadership will be missed.

EXHIBIT E



To: Judge Bolden

From: Renea & Duncan Dayton
Owners, Hayfields LLC

Re: Paul Gileno

Date: September 26, 2019

Dear Honorable Judge Bolden,

Our names are Renea and Duncan Dayton and we are the owners of Hayfields, LLC located at 1 Bloomer Road, North Salem NY 10560. Paul Gileno is currently employed and working for Hayfields as our General Manager and Chef of Hayfields Café and Catering. He has been working at Hayfields since October 2018.

We are pleased to write this letter on Paul's behalf, from both a professional and personal perspective. I was 5 months pregnant when I hired Paul. Specifically, Paul was hired to manager and oversee my business, so that I could step away to focus on my health and ultimate care of our child. Not only has he done so from day one with perfect aplomb, he has exceeded our expectations in every way. Paul is honest, trustworthy, hardworking and extremely dedicated to addressing the needs of our customers and employees. He represents my business in the best of light and I am forever grateful that he has been able to step in with such skill and enthusiasm.

Paul has also ingratiated himself in our local community and is a very popular figure with our patrons. He has worked tirelessly as we continue to try to expand our small business. Without him, we would be in a very difficult position.

We have witnessed firsthand his love of family. As the father of two boys and loving husband to his wife, Paul is the consummate family man. He absolutely adores them and spends every waking hour that he isn't at Hayfields, doting on them. Paul cherishes his family above all else.

It must be extremely difficult to make decisions in cases like this, when you might not actually know the person standing in front of you. I hope you will look at our letter, along with others that you might receive, and realize that Paul is an extremely kind and loving individual that deserves a second chance. If you give him that opportunity, we know he won't let you down. By lending our names in heartfelt support of Paul, we hope this letter will be a positive factor in your decision.

Thank you for your time.

Sincerely,

A handwritten signature in black ink, appearing to read 'Renea Dayton'.

Renea Dayton
renea@hayfieldsmarket.com
713-446-1262

A handwritten signature in black ink, appearing to read 'Duncan Dayton'.

Duncan Dayton
duncan@highcroftgroup.com
914-441-0296

EXHIBIT F



Menu

United States / Job / Chief Executive Officer (CEO), Non-Profit Organization

Average Chief Executive Officer (CEO), Non-Profit Organization Salary

\$105,266

Avg. Salary Show Hourly Rate

\$9,750
BONUS

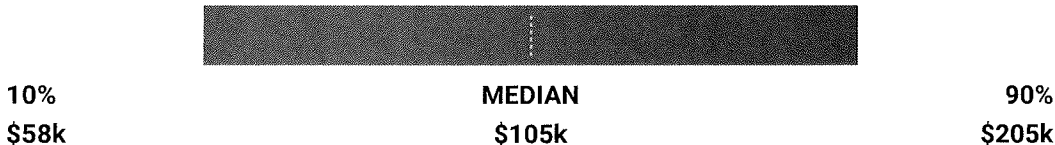
\$8,000
PROFIT SHARING

What am I worth? How should I pay?

Get pay report

Price a job

The average salary for a Chief Executive Officer (CEO), Non-Profit Organization is \$105,266.



Is Chief Executive Officer (CEO), Non-Profit Organization your job title? Find out what you should be paid

Use our tool to get a personalized report on your market worth.

Location:

Enfield, Connecticut

Years in Field/Career:

:

Get your salary report »

United States (change)

How it works:

- 1 Enter city & years of experience
- 2 Add pay factors like skills & education
- 3 Find your market worth with a report tailored to you

City ▾ Experience ▾ Skill ▾ Employer ▾ Job ▾

Salary ● \$58k - \$205k