

STATE OF SOUTH CAROLINA)	IN THE COURT OF GENERAL SESSIONS
)	
COUNTY OF YORK)	INDICTMENT NOS.: 2016GS4600303-00314
)	
STATE OF SOUTH CAROLINA,)	
)	
vs.)	
)	
CHRISTIAN HINE,)	
)	
DEFENDANT.)	

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 C.C.P. & G.S.
 YORK COUNTY, SC

DEFENDANT CHRISTIAN HINE'S SENTENCING MEMORANDUM

On August 22, 2016, the Defendant, Christian Hine, will appear before this Court on charges of Sexual Exploitation of a Minor (Possession of child pornography). We ask this Honorable Court to craft a sentence that takes into account Christian's exceptional qualities, the uncharacteristic nature of his offense, and the recognition that Christian has faced his addiction and is building a stable and successful life with intensive support from his community.

I. STATEMENT OF FACTS

Christian Hine is an outstanding young man, from a devoted family. His descent into depression and pornography abuse was as swift as it is tragic. In early 2015, Christian was employed as a business partner at New Majority Media, LLC, a news and opinion website. With his partner providing local political news coverage, Christian contributed opinion pieces and built the brand via his activist group participation. The website received the support of a 1110 WBT radio personality and Christian frequently appeared "on air" to discuss various topics. New Majority Media also achieved "news partner" status with the *Charlotte Observer* which would frequently link to their articles. During this same time period, Christian's primary employment was delivering mail to financial institutions as an independent contractor. His primary

responsibility was to deliver parcels from the general mail facility in Charlotte to JP Morgan Chase and Transcentra. His future seemed bright. However, unbeknownst to his business partners, his friends, and his mother, Christian had begun “self-medicating” his symptoms of depression with pornography. Without the careful oversight of a medical professional, and no one to speak with due to the stigma associated with internet pornography, Christian quickly became addicted to pornography.

On June 24, 2015, state law enforcement officials knocked on his door with a warrant to search his electronics. Christian accommodated law enforcement’s requests and directed them to all of his computers, tablets and electronics. After this encounter in June 2015, Christian went to his family with the information that his and their lives were about to be seriously impacted. He informed them both of what had happened, and what he had hid throughout the past few years. Although shocked and disappointed, his family has been emotionally supportive throughout the pendency of the investigation and charges.

Christian has now become disassociated from New Majority Media and put any job search on hold as he felt it dishonest to seek new work with the pending charges and uncertainty about his future. He has continued his work as an independent contractor, albeit on a limited basis. Over the past year and a half, he has also relied on the kindness and support of his friends and mother, supplementing the lost income by becoming a driver for UBER.

It is difficult to understand how Christian ended up in such a terrible place. He was born in an intact and supportive family in Wolfeboro, New Hampshire to Dr. Lawrence Hine and Marian Hine. He was close with both parents until his father’s passing in 2010. As a child, the family moved from New Hampshire, to New York, to Florida, to South Carolina. Christian believes that the diversity of environments, schools and income levels helped him later in life to

relate and empathize with people from all walks of life

As a youth, Christian was involved in both the Boy Scouts and in the Baptist Church equivalent, AWANA. He attended several mission trips as a member of his church youth group, including running a Vacation Bible School for underprivileged children in Hilton Head, SC.

Christian was a model student. Academically gifted in early childhood, he excelled in school. He graduated in the top 10% of both his high school and college classes. In college he was a member of the Golden Key National Honor Society, Phi Eta Sigma Honor Society, Beta Gamma Sigma Business Honor Society, and was in the inaugural class of the Honors Program for Business at UNC Charlotte. The latter allowed Christian to participate in a study abroad program at the University of Wales, Swansea during his junior year.

Christian graduated with honors from UNC Charlotte in 1999 with a Business Management degree and a Political Science minor. It was politics that Christian had a true passion for and continued to pursue after graduation.

After college, he joined with others in 2000 to resurrect the Mecklenburg County (Charlotte, NC) Young Republicans, eventually becoming its Chairman in 2003. He was also appointed as the Executive Director of the entire NC Federation of Young Republicans. Shortly thereafter, he teamed with a former member of the Charlotte City Council to form an action committee called Charlotteans Opposed to Sports Taxes. The group defeated the Charlotte Arena referendum through a vigorous grassroots campaign. Throughout the following years, Christian continued to offer his time and energy to many candidates for elected positions in and around Charlotte. In 2012, he was the Mecklenburg County Chairman for NC Lt. Governor Dan Forest, as well as the co-designer of the entire campaign's successful grassroots strategy. During this time period, Christian also involved himself in many other organizations as a volunteer, without

pay, while he maintained his full time employment. He also offered website design services for political candidates and non-profit organizations as a source of additional income.

However, unbeknownst to his family and friends, in the fall of 2004, Christian's depression and anxiety began to increase when his girlfriend of 4 ½ years and soon to be fiancé left him unexpectedly over the holidays. To further complicate matters, it was soon apparent that she was in a relationship with one of his business partners, a close personal friend. Suddenly losing these relationships was hard enough, but losing his source of income and a group of friends at the same time sent him on a downward spiral. Throughout the ensuing years, despite all of his involvement and activities, he was unable to develop any other romantic relationships. With each time another relationship failed to go forward, the depression and loneliness compounded. He hid this well from all but his closest friends.

Christian's mother was concerned about periods of depression in his life. In 2008, at her urging, Christian visited a counselor for approximately three months. Unfortunately, those sessions did not address the core problems in Christian's life and were discontinued.

This and many other factors resulted in an addiction to pornography, which he attempted to use to fill the void in his life. The sources that Christian found to view pornography included the file sharing program E-Mule, which he discovered opened up a world where nearly any philia could be searched and explored. Unfortunately, after some period of time, he began to search images of teens, as opposed to adults. The reasons why are still being discovered and will be worked out in future therapy sessions.

II. RECOVERY AND TREATMENT

Since that day in June 2015 when the police came to his home, Christian has undertaken a difficult, but successful journey towards mental health and rehabilitation. In September of

2015, Christian began seeing Dr. David Wheeler, a psychologist in Charlotte with whom he maintained a regular appointment schedule for four months. While Dr. Wheeler was able to help with Christian's depression and anxiety, he was self admittedly not the best suited to discuss the attraction issues specifically.

In December, Christian found Dr. Terri Watters, another Charlotte psychologist, with whom he could discuss these troubling things. He was under her regular care until April of 2016, when she went on maternity leave. Rather than seek yet another doctor and beginning the relationship building process all over again, Christian intends to maintain his relationship with Dr. Watters and resume regular therapy when she returns to work. These sessions with Drs. Wheeler and Watters taught Christian that he needed to live in a supportive, safe environment. With the advice of his counselors, he remained in his community.

Recently, at the request of counsel, Christian was evaluated by Dr. Donna Schwartz-Watts who diagnosed Christian with two previously unrecognized issues, autistic spectrum disorder and depression. According to Dr. Watts, the spectrum disorder has prevented Christian from socializing as much as most men his age. She also attributes a large degree of emotional trauma to the disruption of his 4 ½ year relationship years ago. Sadly, after that episode in his life, and with limited social skills to find someone, an outlet for his sexuality became the computer. Like many others before him, Christian's spiral into the world of internet pornography led him to stumble upon deviant and illegal sexual interests he did not know existed.

Dr. Watts also determined that there is no evidence of antisocial personality disorder. She concluded that based on her evaluation that he would, to a high degree of medical certainty, successfully follow any guidelines imposed by the court.

Additionally, at the request of counsel, on June 3, 2016, Christian successfully completed

an intensive psychosexual evaluation by Dr. Geoffrey McKee. Dr. McKee administered, scored, and interpreted numerous peer-reviewed, published psychological and psychosexual instruments. He also scored various peer-reviewed, published quantitative measures of current sexual recidivism risk. Finally, he calculated measures of recidivism for non-sexual crimes, that is, Christian's risk of probation violation for general criminal offenses. As will be discussed in more detail later in this memo, Dr. McKee's opinion, based on the testing described above, is that Christian had very low risk scores on the sexual recidivism scales and therefore no empirical or quantitative grounds exists that would preclude a probationary sentence.

Christian takes full responsibility for his addiction and his crimes. He understands that he has permanently affected his future and he knows that his life is changed forever. His felony convictions will follow him forever, as will his lifetime reporting requirement, affecting his opportunities and career choices. However, he also believes that he is on the right path to being a productive citizen. He has no intention of ever returning to pornography to ease his depression and anxiety. He hopes to make amends for his crime by working hard in his community, and dedicating himself to the community where he will work.

He asks that this Honorable Court consider the nature of his pornography addiction, his successful rehabilitation, the aberrant nature of his crime, and the futility of imprisonment in his situation. And, he suggests that a house arrest sentence would be consistent with the purposes of South Carolina's Criminal Code of Laws.

III. DISCUSSION

The U.S. Supreme Court has observed that our criminal justice system strives "to consider every convicted person as an individual and every case as a unique study in the human failings that sometimes mitigate, sometimes magnify, the crime and the punishment to ensure."