

AARON MICHAEL KAHN | PIG NEWS

Founder and Editor-in-Chief, PIG News (Press. I Guess. News. Carolinas)
PIGnewscarolina@gmail.com | (803) 361-5841
PIG News is a trade name of TipTopQualityX LLC.

August 18, 2026

FOR COMPROMISE NEGOTIATIONS - SOUTH CAROLINA RULE OF EVIDENCE 408

VIA HAND DELIVERY AND EMAIL; COPY TO COUNTY ATTORNEY, COUNTY MANAGER, AND CLERK TO COUNCIL

- 1. Robbie Templeton, individually and as Greenwood County Council Member, District 6**
- 2. Theo Lane, individually and as Chairman of Greenwood County Council, District 7**
- 3. Greenwood County, South Carolina**

Attn: Carson Penney, County Attorney; Toby Chappell, County Manager; Susan McIntyre, Clerk to Council
600 Monument Street, Suite 102, Box P-103, Greenwood, South Carolina 29646

RE: V2 FORMAL GLOBAL SETTLEMENT DEMAND - \$250,000; SUPERSEDING AUGUST 4, 2026 DEMAND; NOTICE OF CLAIMS; CORRECTIVE TERMS; AND PRESERVATION DEMAND

Mr. Templeton, Chairman Lane, and Greenwood County:

This V2 demand supersedes the August 4, 2026 settlement proposal as to the parties and factual record while preserving every evidence-preservation obligation already triggered by the earlier notice. The demand now identifies Robbie Templeton as the principal prospective individual defendant, Theo Lane as the secondary prospective individual defendant, and Greenwood County as the third prospective defendant. The single global settlement amount remains \$250,000. This update is driven by newly preserved law-enforcement evidence and the August 18, 2026 Council meeting, at which Chairman Lane used the official Council forum to publicly characterize Kahn's complaint, motives, credibility, and the SLED review, followed by Templeton's own materially different description of what occurred and his refusal to allow Kahn even ten seconds to respond.

This letter does not depend on proving that every challenged statement creates a standalone tort claim. It gives notice of a connected course of alleged retaliatory, reputational, access-related, and constitutional injury; identifies the nonprivileged evidence that must be preserved; and offers a global resolution without requiring any recipient to admit liability.

DEFENDANT / RESPONDENT STRUCTURE

Priority	Party	Current Basis
Principal	Robbie Templeton	Flyer transmission evidence; pre-meeting hostility; July 21 presiding role; disputed law-enforcement premise; microphone cutoff; repeated control over Kahn's ability to answer.
Secondary	Theo Lane	Consent to Templeton presiding July 21; August 18 official public statement attacking Kahn's motives and credibility and characterizing the law-enforcement process; evidence of alleged ratification and continuing retaliatory context, plus any nonprivileged communications or direction established in discovery.

Third	Greenwood County	Council procedures, official forum, records, preservation, policy/custom/final-policymaker or ratification theories where legally supportable, prospective relief, insurance/indemnity, and state-law governmental liability where applicable.
--------------	-------------------------	--

PROPOSED RESOLUTION

A single global payment of \$250,000 to resolve the covered civil claims against Templeton, Lane, and Greenwood County through the effective date of a written settlement.
Written corrective, preservation, nonretaliation, and equal-access terms described below.
Written response by 5:00 p.m. on August 25, 2026. A reasonable extension may be requested before the deadline for insurer or counsel review.
No admission of liability is required. Allocation among the County, Templeton, Lane, insurers, indemnitors, or other payors may be determined by the responding parties.
All prior preservation duties remain in effect. Nothing in this V2 authorizes deletion, alteration, overwriting, auto-expiration, or destruction of evidence covered by the August 4 notice.

1. July 21: The Law-Enforcement Premise Used to Cut Kahn Off

The July 21 County transcript records Templeton telling Kahn, immediately before ordering the microphone cut:

“You’ve already told law enforcement tonight that your goal here was to go overtime and get thrown out.”

Templeton then stated, “I’m not going to let you make a show out of this,” directed “cut his mic, please,” and called recess. The factual premise attributed to law enforcement is now contradicted by the two law-enforcement officials Kahn reports actually speaking with in connection with the meeting.

- Sgt. Napier: In a later participant recording, when Kahn asked whether Napier had heard from anybody that Kahn intended to talk overtime, Napier answered, “No.” Napier also described his role as ordinary meeting safety and indicated he did not want Council to cut Kahn off after the recess.
- Second law-enforcement contact: In a newly preserved recording, Kahn asked whether he had ever said, “in any shape or form,” that his purpose was to talk overtime and get thrown out. The official answered, “Not that I recall.” The same official then affirmatively remembered Kahn explaining that he had “like, 15 minutes worth of time or something.”
- The second official also stated, in discussing the law-enforcement referral, “I can tell you, we have sent it,” corroborating that the matter was transmitted onward for SLED review.

These two recordings do not by themselves prove what Templeton subjectively knew when he spoke. They do, however, leave the County with a concrete factual problem: neither law-enforcement official Kahn reports actually speaking with supports Templeton’s categorical public assertion. If Templeton contends that some third person supplied the allegation, that person, communication, timing, and exact words must be identified and preserved.

2. July 21: Advance Hostility, Presiding Arrangement, and Unequal Control of the Forum

- At 2:18 p.m. on July 21, a preserved message screenshot supplied by a direct recipient shows a contact identified as Templeton describing the “pig news guy” as “certifiable” and most of the material as “absolute just made up bs.” Native-thread authentication remains available and should be preserved.
- The approved minutes and public recording establish that Chairman Lane and Vice Chairman Dayne Pruitt consented to Templeton presiding while both were present. The timing, reason, and communications behind that deliberate chair substitution remain material discovery targets.
- Kahn delivered a written request invoking Greenwood County Code § 2-2-9 shortly after 4:00 p.m. while Council was in executive session. Templeton later stated publicly that the request was received “a little after 4,” and County Manager Chappell identified § 2-2-9 as a matter discussed while Council was closed.

- Immediately before Kahn was called, Templeton stated, “Council has asked me to make the following brief statement,” and delivered Council’s categorical data-center message. He then moved directly into ruling on Kahn’s written speaking request.
- During public comment, Templeton gave other speakers extensions and acknowledged being “lenient,” while Kahn was repeatedly interrupted, restricted, publicly accused of planning disruption, and cut off.

The federal theory is not that Kahn possessed an unlimited right to speak. It is that a government forum may not be administered on a viewpoint-discriminatory or retaliatory basis, and the pre-meeting hostility, chair selection, unequal administration, disputed law-enforcement premise, and cutoff are probative of motive and pretext.

3. Flyer Publication and the “Attorney Shopping” Narrative

A flyer identifying “Aaron Michael Kahn AKA PIG News” combined public criminal-charge information with added narrative including:

“According to my sources, he is attorney shopping, meaning attorneys are entering and then withdrawing appearances. It’s a common game.”

The attorney records materially contradict that factual premise. Boatwright Legal informed Kahn that Brooke Ennis was leaving the firm; Kahn elected to remain with Boatwright Legal; and Ashaley Boatwright was substituted for Ennis by consent in the same firm. The court-approved substitution did not establish a pattern of unrelated attorneys repeatedly entering and withdrawing.

A preserved July 25 recording contains a discussion of “that flyer that you sent me weeks ago,” followed by Templeton responding in substance, “when I sent it to you,” while denying that he created it or knew of broader parking-lot distribution. The same call records repeated efforts to discourage further communication with Kahn or PIG News, including “don’t feed the beast” and “don’t talk to this guy anymore.” The complete native recording and context are preserved. This demand does not mischaracterize those phrases as criminal witness tampering; they are relevant to publication, motive, source isolation, and narrative control.

4. August 18: Chairman Lane’s Public Attack and the County’s Own Internal Contradiction

On August 18, 2026, immediately before Council moved into new business, Chairman Theo Lane used the official Council meeting to deliver a lengthy statement concerning the Templeton matter and Kahn. The independent phone recording is preserved. Lane told the public, among other things, that Templeton had been “exonerated,” that the allegations were “baseless and meritless,” that he believed there was “some malice,” and that what had occurred was “weaponization of [the] criminal justice system” directed at Templeton because of “personal animus.” Lane also characterized the criminal-justice system as having been used to “prosecute” Templeton and urged the public to scrutinize people making “unfounded, malicious and sensational claims.”

Those characterizations materially exceed the procedural posture reflected in the complaint itself. Kahn’s complaint expressly asked law enforcement to authenticate evidence and determine whether criminal conduct occurred; it did not charge, prosecute, convict, or declare Templeton guilty. The complaint expressly distinguished allegations from proven facts.

Minutes later, Templeton himself gave the public a materially different description:

“There was never an investigation, there was an inquiry.”

Templeton further stated the inquiry opened July 27 and closed August 6 and thanked the Greenwood County Sheriff’s Office for sending the matter to SLED because of the local relationship/conflict concern. That statement is significant in two directions: it confirms that the matter did reach SLED, while at the same time materially qualifying Lane’s public “investigated / exonerated / baseless and meritless / prosecuted” framing.

If Lane or the County contends SLED itself made the specific findings “baseless,” “meritless,” or “exonerated,” the written communication, report, closing notice, email, memorandum, or other source on which that assertion was based must be identified and preserved. If no such source exists, the County should correct the public record.

5. August 18: Officials Spoke at Length; Kahn Was Denied Ten Seconds

After Lane's extended statement and Templeton's own response, Kahn asked, "Can I have 10 seconds to respond?" Templeton immediately answered, "No, you may not." Kahn then spoke briefly anyway, stating that the evidence would be released and the public could decide.

This sequence is highly probative of continuing viewpoint and access issues. The official forum was used to attack Kahn's motives and credibility and to defend Templeton; Templeton was permitted to address the matter; yet the identified target of the accusations was denied even ten seconds to respond. The County may contend the presiding officer had procedural authority to control the floor. That defense does not erase the evidentiary significance of who was permitted to speak, for how long, and on what terms after the County had already been placed on notice of Kahn's retaliation and equal-access claims.

6. Theo Lane - Secondary Individual Defendant

Lane is added in V2 because the evidence now reflects affirmative personal participation rather than mere status as chairman. The current record includes his consent to Templeton presiding on July 21 while Lane remained present; his August 18 use of the official Council platform to characterize Kahn's motives, credibility, complaint, and the law-enforcement process; and the need to determine what nonprivileged communications, source documents, instructions, coordination, or ratification preceded those acts.

Lane's individual designation is not premised on an assumption that every statement made from the Council dais is unprivileged. South Carolina law recognizes protections for legislative functions, and the South Carolina Tort Claims Act generally directs in-scope tort claims to the governmental entity while preserving individual exposure where the statutory conditions are proved. See S.C. Code Ann. § 15-78-70(b). This demand therefore reserves individual-capacity claims against Lane to the extent supported by federal law, conduct outside protected legislative functions, nonprivileged communications or acts, actual malice/intent to harm where legally relevant, or other facts established through discovery. The August 18 remarks remain material evidence of motive, ratification, continuing retaliation, and reputational injury regardless of the ultimate claim label applied to each sentence.

7. Greenwood County - Third Defendant / Municipal and Governmental Exposure

The County is included as the third prospective defendant because it controls the Council meeting process, official minutes, audiovisual records, clerk and staff systems, public-comment administration, legal advice structure, records preservation, and the official platform used on July 21 and August 18. Federal municipal liability will require proof of a legally sufficient policy, custom, final-policymaker act, authorization, or ratification; this demand does not rely on respondeat superior under 42 U.S.C. § 1983.

Relevant municipal-liability discovery now includes the deliberate selection of Templeton to preside; the timing and handling of Kahn's § 2-2-9 request during executive session; the official response to Kahn's preservation and settlement notice; the preparation or authorization of Lane's August 18 statement; the source of the representations about SLED; the refusal of a response; and any post-notice Council, attorney, manager, PIO, insurer, or staff communications concerning how Kahn or PIG News should be handled.

8. Damages and Settlement Valuation

The claimed harm now includes two separate public-meeting events in which governmental authority was allegedly used against Kahn's reporting and credibility; publication of a misleading flyer to at least one third party; public attribution of a disruption plan to law enforcement that neither identified law-enforcement contact now supports; denial of a meaningful response after official accusations; reputational impairment; interference with press/source/community relationships; public humiliation; investigative and preservation expense; and constitutional injury. Additional economic, professional, and emotional-distress damages remain subject to documentation and expert proof where required.

The \$250,000 demand remains a compromise figure, not a representation that any single cause of action automatically produces that amount. It is intended to resolve disputed compensatory, reputational, constitutional, equitable, fee-shifting, defense-cost, and—against individuals only where legally available—punitive exposure in one global settlement.

9. Requested Corrective and Nonmonetary Terms

- A written correction or clarification distinguishing a citizen complaint/request for investigation from criminal charges, prosecution, conviction, or an adjudication of guilt.
- If the County or Lane continues to state that SLED found the allegations “baseless,” “meritless,” or that Templeton was “exonerated,” identification and production of the written source that supports those precise factual characterizations, subject to lawful privilege and disclosure limitations; otherwise, a public correction of those characterizations.
- Withdrawal, correction, or substantiation of Templeton’s July 21 assertion that Kahn told law enforcement his goal was to run overtime and get thrown out, including identification of the alleged source if the assertion is maintained.
- A written clarification that pending criminal charges against Kahn are not convictions and that the available attorney records reflect a same-firm substitution rather than an established pattern of “attorney shopping.”
- Identification of each person or entity to whom Templeton sent, showed, forwarded, or caused the flyer to be provided, subject to lawful privilege objections, and cessation of further distribution of the flyer or repetition of materially unsupported factual additions.
- A written nonretaliation commitment covering Kahn, PIG News, sources, witnesses, and persons who provide records or information to PIG News.
- Written assurance that future public-comment, media-access, and response rules will be administered on content-neutral and viewpoint-neutral terms.
- Preservation of all potentially relevant electronically stored information, recordings, physical evidence, and source documents identified below.

10. Expanded Preservation Demand

Templeton, Lane, and Greenwood County must preserve, without alteration or automatic deletion, all evidence from January 1, 2026 forward concerning Kahn, PIG News, the flyer, Project Payphone, Project Piranha, July 21, August 18, the SLED/GCSO inquiry or referral, and all responses to Kahn’s complaints, settlement communications, public statements, or preservation demands. This includes:

- Emails, texts, iMessages, messaging-app data, call logs, voicemail, social-media messages, deleted-item folders, cloud backups, and personal-device communications used for public business by Templeton, Lane, Council members, County management, County counsel, the Clerk, PIO staff, and relevant employees;
- Every draft, talking point, note, outline, email, text, source document, or communication used to prepare Lane’s August 18 statement or Templeton’s August 18 response, including communications about whether, when, or how Kahn would be permitted to answer;
- Every communication, report, closing notice, email, memorandum, case note, referral, or other record received from or sent to GCSO or SLED concerning the Templeton matter, including the source for any use of the words “exonerated,” “baseless,” “meritless,” “investigated,” “inquiry,” or “closed”;
- Native flyer files, drafts, screenshots, source material, printing records, transmission records, recipient lists, and metadata;
- Council, staff, County Attorney, and law-enforcement communications concerning the July 21 presiding arrangement, Kahn’s § 2-2-9 request, executive-session handling, speaker restrictions, law-enforcement preparation, microphone control, and post-meeting communications;
- Original/native July 21 and August 18 audiovisual files; livestream archives; YouTube Studio history; encoder logs; camera/switcher files; operator instructions; editing history; security video; microphone/PA records; and any unpublished recordings;
- Body-camera status records, assignment logs, activation/audit logs, CAD entries, dispatch audio, radio traffic, incident reports, officer notes, security plans, and related records;
- Insurance notices, risk-management communications, indemnity communications, and preservation notices, subject to lawful privilege protections.

The preservation duty includes evidence that may favor the recipients. No party should selectively delete, trim, replace, re-export, overwrite, or allow retention systems to expire original material. Native files and metadata should be maintained even where a copy has already been produced.

11. Settlement Process and Reservation of Rights

This proposal is made for compromise purposes under South Carolina Rule of Evidence 408. Independently discoverable evidence does not become inadmissible merely because it is referenced in a settlement

communication. This V2 is also an express preservation notice and does not waive or replace any statutory claim-presentment, limitations, FOIA, constitutional, tort, or procedural requirement.

The proposed resolution remains open through 5:00 p.m. on August 25, 2026. Please direct the written response to PIGnewscarolina@gmail.com and preserve proof of receipt. If counsel, an insurer, or a risk-management representative will handle the matter, identify that representative promptly.

Nothing in this letter admits the truth of any pending criminal allegation against Kahn. Pending charges are not convictions. Nothing in this demand asserts that the existence of a SLED inquiry or referral proves criminal wrongdoing by Templeton, Lane, or anyone else. The dispute concerns what the evidence shows, how public power was used, what was said to the public, and whether protected reporting and petitioning activity was met with unlawful retaliation or unequal treatment.

This V2 is a settlement proposal, not a filed pleading. Kahn reserves the right to amend parties, claims, damages, and factual allegations as additional records, native evidence, witness testimony, insurance information, and discovery become available.

Respectfully,

Aaron Michael Kahn

Founder and Editor-in-Chief, PIG News

TipTopQualityX LLC

Enclosures / Evidence Available Upon Request: July 21 County transcript and minutes; flyer and attorney-substitution records; preserved July 25 call; two law-enforcement recordings; August 18 independent phone recording and transcript; August 18 agenda; prior preservation materials.

HAND-DELIVERY / SERVICE RECEIPT - V2

Document received: V2 Formal Global Settlement Demand, Notice of Claims, Corrective Terms, and Preservation Demand dated August 18, 2026. This V2 supersedes the August 4 settlement proposal while preserving all prior preservation obligations.

Robbie Templeton - Principal Individual Recipient

Received by: _____

Title/Office: _____

Date and time: _____

Signature or date stamp: _____

Theo Lane - Secondary Individual Recipient

Received by: _____

Title/Office: _____

Date and time: _____

Signature or date stamp: _____

Greenwood County - Governmental Recipient

Received by: _____

Title/Office: _____

Date and time: _____

Signature or date stamp: _____

Receipt acknowledges delivery only and does not constitute agreement with the contents.