

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA

vs.

CASE NO. 3:16-cr-48-J-25JBT

REGINALD FULLWOOD

DEFENDANT’S SENTENCING MEMORANDUM

I. INTRODUCTION

The Defendant, REGINALD FULLWOOD, will be before the Court for sentencing on February 7, 2017 at 10 a.m.. There are two pending challenges to the guideline calculation presented by the PSR, but, as presently calculated, the guidelines yield is 15-21 months of imprisonment. That guideline calculation notwithstanding, the Defendant seeks a non-custodial sentence based on his personal circumstance and the circumstances of the case. The following is a brief summary of the Defendant’s position before the Court:

II. PERSONAL BACKGROUND AND RELEVANT HISTORY

Mr. Fullwood is 41 years of age. He was raised and educated in Jacksonville and holds a bachelors degree from the University of North Florida.

Regrettably, he is in the process of ending a relatively long term marriage to a well regarded lawyer with whom he has two children. The Defendant’s current circumstance before this Court certainly played a part of the pending dissolution of

that long term marriage. The court will find from letters earlier provided, that the Defendant is a committed, attentive, and supportive father. At least in part, his devotion to his children may be because his own father (and step-father) were largely absent in his life. Both his father and his step-father struggled with addiction to drugs and that greatly impacted his family life. Indeed, one of them was eventually murdered by a fellow drug addict in 1991, when Mr. Fullwood was 16 years of age.

He continues a very good relationship with his mother, Christine Fullwood Webb, an administrator at a local High School. His support group also includes five siblings, all of whom are doing well. That support group also includes his step-mother, Loretta Stroughter, who is accurately described in the PSR as a “long term source of loving support.” Similarly, he enjoys a close relationship with his grand-mother who is 75 years of age. He has another child from a previous relationship, age 21, who is employed by Florida Blue and also doing well.

Because of his marital and financial situation, the Defendant is currently residing with his sister and intends to remain at the residence until he is able to find a steady job and live independently. His sister, Crystal Webb, advised the PSR writer that he was welcome in her home for as long as necessary. The Defendant has written a weekly editorial column in the Jacksonville Free Press for over 15 years, and thankfully the newspaper has offered to expand his role from columnist to full-time associate editor.

The Defendant has never had any history involvement with illicit substances. However, as he describes, he is “from a family of drinkers” and not surprisingly developed a habit of using alcohol to excess. It is not an excuse and certainly no defense, but it is likely that his alcohol involvement contributing significantly to the circumstances now before this Court. He has been involved with AA since 2014 and has consistently seen a mental health professional as well and his recovery so far seems to be successful.

III. PUBLIC SERVICE

Certainly Mr. Fullwood is more well known for his history of public service. He became the youngest member ever elected to the Jacksonville City Council at the age of 23 and after an initial unsuccessful campaign for the House of Representatives, he was elected in 2010, and has been continually elected thereafter until his resignation late last year following his pleas in this case. Prior to his conviction in this case, the Defendant enjoyed an extremely fine reputation among his colleagues, his constituents, and the business community of Jacksonville and surrounding areas. His convictions have at least greatly damaged, if not destroyed that reputation he had earned.

As noted earlier, the court has received a number of letters which explores these accomplishments in greater detail and there will be one or more persons appearing at the time of sentencing offer to further insight.

The letters also outline his extensive involvement in community service. The contributions that he has made during his public career are nothing short of remarkable. The letters describe him as having a genuine interest in serving and helping others. He has been involved with various organizations, including 100 Black Men of Jacksonville, Inc., Team Leaders of America, Take Stock in Children, and, most especially, his services as executive director of Metro North Community Development, Corp., of Jacksonville, Florida, a non-profit real estate development organization that provides quality low-cost housing for first time homeowners in the urban core. Mr. Fullwood served as executive director from 2010 until he resigned that position in the immediate aftermath of his pleas of guilty. As described by the letter from Mr. Jerome Crawford, former chairman of the board, Mr. Fullwood “performed exceptionally as executive director and provided quality low-cost single family housing for more than 50 first time homeowners and developed a multi-family apartment unit provided high-quality rental housing in the Jacksonville community.” Mr. Fullwood effectively served the community and the dozens of families that received new affordable homes and renovate homes. The Defendant felt that it would be best for the good of that agency that he resigned the position in the aftermath of these Court proceedings.

IV. SUMMARY

Mr. Fullwood has pled guilty to one count of Wire Fraud and one count of Failure to File his Tax Return. He accepts full responsibility for his actions. Nonetheless,

it may be fairly said that he did not recognize the enormous significance of the campaign related charge. The circumstances of this case are arguably quite similar to others that have been previously handled by the Florida Election Commission resulting in relatively small, civil fines. The failure to file tax returns was clearly a matter of neglect. It was always his intention to eventually “catch up” but that is neither an excuse nor defense for his violation of law. As stated, he accepts full responsibility.

With the exception of the guideline yield based upon the current calculation, there is literally nothing that suggests Mr. Fullwood should be incarcerated. If allowed, he will have a bright future notwithstanding the undeniable fact of these convictions. Following his resignation as executive director in the late fall of 2016, he has explored a number of opportunities to be re-engaged in business, including business benefiting the community. Of course, he cannot make any meaningful plans or commitment until he knows what his future holds. Despite his personal failings as reflected in this case, he has potential for enormous benefit to this community.

It is respectfully suggested that the Court should exercise its discretion and impose a non-custodial sentence.

RESPECTFULLY SUBMITTED this 3rd day of February, 2017.

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I HEREBY CERTIFY that on February 03, 2017, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to United States Attorney's Office, 300 North Hogan Street, Suite 7000, Jacksonville, Florida 32202.

s/ Robert Stuart Willis
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