

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CASE NO.: 6:26-cr-00008-JA-RMN

KEEVIN ANTONIO JONES,

Defendant.

DEFENDANT’S SENTENCING MEMORANDUM

The Defendant, Keevin Antonio Jones, respectfully submits this sentencing memorandum for this Honorable Court’s consideration. Mr. Jones requests that this Court impose a sentence of probation.

Introduction

It has been uniform and constant in the federal judicial tradition for the sentencing judge 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 ensue.

Koon v. United States, 518 U.S. 81, 113 (1996).

This memorandum establishes that Mr. Jones’s request for probation is warranted pursuant to 18 U.S.C. § 3553(a) and Supreme Court precedent. An examination of section 3553 demonstrates that each of its sentencing factors supports Mr. Jones’s request for a variance. *See* 18 U.S.C. § 3553(a).

Furthermore, regardless of the sentencing guidelines, a sentencing court is unencumbered in its ability “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 ensue.” *Gall v. United States*, 552 U.S. 38, 53 (2007) (quoting *Koon v. United States*, 518 U.S. 81 (1996)). To conduct an individualized assessment, the Sentencing Reform Act provides that “[n]o limitation shall be placed on the information concerning the background, character, and conduct of a person convicted of an offense which a court of the United States may receive and consider for the purpose of imposing an appropriate sentence.” 18 U.S.C. § 3661. Likewise, the United States Supreme Court has stated:

There is a “long” and “durable” tradition that sentencing judges “enjo[y] discretion in the sort of information they may consider at an initial sentencing proceeding. This history dates back to before the founding: Both before and since the American colonies became a nation, courts in this country and in England practiced a policy under which a sentencing judge could exercise a wide discretion in the sources and types of evidence used to assist him in determining the kind and extent of punishment to be imposed within limits fixed by law. Early state and English courts broadly recognized this discretion.

Concepcion v. United States, 597 U.S. 481, 486 (2022)(internal quotations and citations omitted).

As contemplated by the Supreme Court, this Court’s ability to consider all relevant information at the time of Mr. Jones’s sentencing is critical to its ability to fashion a just sentence in his case. *See Pepper v. United States*, 562 U.S. 476, 488 (2011) (“Permitting sentencing courts to consider the widest possible breadth of

information about a defendant ensures that the punishment will suit not merely the offense but the individual defendant”).

In calling for an expansive presentation and consideration of information at sentencing, the § 3553(a) factors and Supreme Court precedent comprehend that a defendant’s punishment cannot be reduced to the limited narrative presented by an Indictment and the offense conduct section of a Presentence Report (PSR).¹ And it is also a biased narrative. The Indictment casts the Defendant as a villain deserving of retribution. The PSR follows with a short story often distorted by its emphasis on the defendant’s criminal conduct.

For Mr. Jones, then, justice ultimately depends on this Court’s choice -- will it choose a limited tale of criminal conduct, or will this Court consider an existence that lies beyond the Indictment and PSR. Choosing the Indictment’s and PSR’s narrow constrained path of past wrongs is antagonistic to justice. It is a narrow trail in which the sins of a defendant’s past outweigh the virtues of his future.² Admittedly, such a calculation is alluring since it removes the angst of making

¹ In encouraging a broad consideration of information at sentencing, Supreme Court precedent comprehends the significance of an expansive narrative in achieving just sentencing outcomes. In doing such, the Supreme Court recognizes the paramount role stories play in human life. Such a recognition is not surprising. Indeed, stories lie at the heart of our evolution and identity. *See, e.g.*, Parul Sehgal, *The Tyranny of the Tale*, *The New Yorker* (July 3, 2023).

² *But see* Oscar Wilde, *A Woman of No Importance* (1893) (“[E]very saint has a past, and every sinner has a future”).

individual assessments concerning a defendant.³ While this calculation is seductive in its simplicity, it is alarming in its effect. To be sure, simple narratives are often false ones (“Stop the Steal;” “The War on Drugs;” “Crack Babies;” and “Equal Protection under the Law”).

As the following section demonstrates, Mr. Jones’ criminal actions were a lamentable episode in an otherwise exemplary life.

Chapter 1

Nature of the Offense and History and Characteristics of the Defendant

But, surely, if ever a man is to receive credit for the good he has done, and his immediate misconduct assessed in the context of his overall life hitherto, it should be at the moment of his sentencing, when his very future hangs in the balance. This elementary principle of weighing the good with the bad, which is basic to all the great religions, moral philosophies, and systems of justice, was plainly part of what Congress had in mind when it directed courts to consider, as a necessary sentencing factor, ‘the history and characteristics’ of the defendant.

United States v. Adelson, 441 F. Supp. 2d 506, 513-14 (S.D.N.Y. 2006)

As the Letters of Support demonstrate, Mr. Jones appreciates the seriousness of his conduct and is remorseful for his criminal actions. *See Letters of Support*, attached hereto as Exhibit 1. As Aubrey Perry states:

³ A sole reliance on Mr. Jones’ offense conduct reflects a human aversion to the uncertainty and ambiguity attached predicting a man’s unknowable future. *See, e.g.*, Maria Konnikova, *Why We Need Answers*, The New Yorker (Apr. 30, 2013). As Konnikova asserts, studies demonstrate that the need to respond to uncertainty or a lack of clarity is present in the early stages of human development. *Id.* Because of our distress with the unknown and uncertain, we seek to achieve “cognitive closure” defined as the “desire for a firm answer to a question and an aversion to ambiguity.” *Id.* (citation omitted).

I understand the difficulties Keevin now faces, and I fully understand they are of his own making. But nobody understands that more than Keevin. Every time I have seen or spoken to him since, he has personally apologized to me.

Ex. 1, *Letter of Aubrey Perry*

Despite his criminal conduct, section 3553(a) is not limited to a defendant's criminal conduct. The significance of the first § 3553 factor is its comprehension that a consideration of a defendant's criminal conduct cannot disregard the life he has led beyond his crime. *See Adelson*, 441 F. Supp. 2d at 513-14. This tenet has resonance in the instant case. For the weighing of the good with the bad in Mr. Jones's life reveals that his criminal conduct should not provide the sole basis for judging his fate. Rather, Mr. Jones's history and characteristics show that he embodies the best in humanity – dedication to his family and compassion for others. *See Ex. 1*. As Marchae Lee writes: “Based on my long-standing relationship with Keevin, I can confidently say that his character is defined by compassion, accountability, service to others, and a sincere desire to positively impact both his family and his community.” *Id.*, *Letter of Marchae Lee*.

Dedication to his Family

Mr. Jones is not only a dedicated husband, but also a committed and loving father to his two young daughters. *See id.* Sylvia Martin Leath writes:

As the father of one infant and a toddler, Keevin embraces his role with patience, love, and responsibility. He is actively involved in every aspect of his children's lives from late night feedings and diaper changes to playtime, bedtime stories, and teaching important values

through his actions. Even with the hardship and circumstance of his current case, he continues to prioritize their well-being above all else and works hard to ensure they grow up in a stable, nurturing, and loving environment.

Id., *Letter of Sylvia Martin-Leath*. Similarly, Mr. Jones’ partner states:

He is a man of integrity, strong work ethic, and deep responsibility — not only to me, but to our two daughters.

From the beginning of our relationship, Keevin has consistently demonstrated commitment and devotion to our family.

Ex. 1, Letter of Shuntavia Wilson.

In determining Mr. Jones’s sentence, this Court may consider that he is an excellent husband and father to his daughters. *See e.g., United States v. Pauley*, 511 F.3d 468 (4th Cir. 2007) (affirming 42-month sentence for defendant convicted of possession of child pornography with an advisory guideline range of 78-97 months in part because “besides the criminal conduct at issue, Pauley was a . . . good father”).

Mr. Jones’ dedication extends beyond his immediate family. *See id.* “His commitment to his loved ones is the central focus of his life, and he works hard to be a positive, stabilizing presence for them. *Id.*, *Letter of Jadarius Larkin*; *see also Letter of Trinity Leath* (describing Mr. Jones’s critical support after the passing of her grandfather and his commitment to family).

Mr. Jones’ commitment to his family is reflected in his care for his grandmother who suffers from dementia. *Id.*, *Letter of Shonda Martin* (“Keevin

also helps care for his sickly grandmother when needed without hesitation.”); *Letter of Byron Morrison* (“[Keeven Jones] has been a steady source of support to his mother as she provides care for his grandmother”). See also *Letter of De’Leah Leath* (noting the time he spends with their grandmother at family gatherings).

Compassion for Others

Mr. Jones’s dedication to his family parallels his commitment to others. Ex. 1, *Letter of Jadarius Larkin* (“He is someone with a remarkable caring heart who has consistently shown kindness to those around him”); *Letter of Natalie LeBlanc* (“He is kind, generous, and the type of person who would truly give you the shirt off his back if you needed it”). Notably, Mr. Jones has demonstrated such compassion⁴ throughout his life.

As a teenager and throughout his adulthood, Keevin would always stop and give food and money to the homeless that seemed to be in need. Keevin would donate his old tennis shoes to under privileged teens in our neighborhood and advising them not to get into

⁴ Regarding the significance of compassion to human existence, the Dalai Lama XIV has concluded:

We can reject everything else: religion, ideology, all received wisdom. But we cannot escape the necessity of love and compassion.... This, then, is my true religion, my simple faith. In this sense, there is no need for temple or church, for mosque or synagogue, no need for complicated philosophy, doctrine or dogma. Our own heart, our own mind, is the temple. The doctrine is compassion. Love for others and respect for their rights and dignity, no matter who or what they are: ultimately these are all we need. So long as we practice these in our daily lives, then no matter if we are learned or unlearned, whether we believe in Buddha or God, or follow some other religion or none at all, as long as we have compassion for others and conduct ourselves with restraint out of a sense of responsibility, there is no doubt we will be happy.

trouble . . . It has always brought joy to Keevin just knowing he could make a difference to others.

Ex.1, *Letter of Shonda Martin*.

Mr. Jones' passion for helping others is demonstrated by his commitment to his community including his work with the homeless, at-risk youth and the less fortunate. *Id. Letter of Robert E. Jones III* (depicting Mr. Jones' work with young people in Winter Garden and Orlando, Florida) *Letter of Marchae Lee* (stating that Mr. Jones has organized back-pack drives for children in need and has assisted in feeding the homeless). Likewise, after portraying Mr. Jones' significant support for her during college, Dr. Najah Bilal writes: "He's active in his church, participates in community service events like helping to feed the homeless and less fortunate and back to school supply drives for underprivileged children." *Id., Letter of Dr. Najah Bilal*.

In addition to *Adelson*, other cases support the proposition that a defendant's history of charitable deeds and good works supports a variance. *See, e.g., United States v. Tomko*, 562 F.3d 558, 569-71 (3d Cir. 2009) (en banc) (where defendant was convicted of tax evasion of \$225,000 and faced a guidelines sentence of 12-18 months, district court's sentence to probation on condition of one year home detention was not unreasonable because of his "negligible criminal history, his employment record, his community ties, and his extensive charitable works"); *United States v. Thurston*, 544 F.3d 22, 26 (1st Cir. 2008) (where defendant was convicted of fraud in excess of five million dollars and guidelines capped at 60

months, district court's sentence of 3-months was affirmed based on defendant's "charitable work, community service, generosity with time, and spiritual support and assistance to others"); *see also United States v. Cooper*, 394 F.3d 172 (3rd Cir. 2005) (similar).

A consistent theme in Mr. Jones's life is his strong sense of commitment to others. The Letters of Support describe an individual who has led an exemplary life – a life marked by his commitment to his family and his community. Thus, if *Adelson's* admonition that a court should consider a defendant's overall existence in imposing his sentence, then the totality of Mr. Jones's existence and the man he has proven to be calls for mercy.

Chapter 2 **Just Punishment**

All in all, punishment hardens and renders people more insensible; it concentrates; it increases the feeling of estrangement; it strengthens the power of resistance.

Friedrich Nietzsche, *The Genealogy of Morals*, essay 2, aph. 14 (1887)

In imposing a just sentence, this Court should consider the significant punishment resulting from the indirect consequences of Mr. Jones's felony conviction. Prior to the instant offense, Mr. Jones had no criminal felony record. Now, based on his felony conviction, Mr. Jones will face an overwhelming number of consequences. A congressional report authored by the United States Government Accountability Office (GAO) demonstrates that there are 641

collateral consequences of a nonviolent felony conviction. *See* GAO Report 17-691, NONVIOLENT DRUG CONVICTIONS, *Stakeholders Views on Potential, Actions to Address Collateral Consequences*, (Sept. 2017), summary excerpt attached hereto as Exhibit 2. Of these 641 collateral consequences, 497 (78%) of them may last a lifetime. *See id.* Notably, Mr. Jones has also experienced the devastating punishment rendered by the collateral consequences of his conviction since he has lost his career in law enforcement.

In addition to the other collateral consequences of his conviction, Mr. Jones's felony conviction will have a significant impact on his future job prospects based on his race. *See* Devah Pacer et al, *Sequencing Disadvantage: Barriers to Employment Facing Young Black and White Men with Criminal Records*, Annual. Am. Acad. Pol. Soc. Sci. 623(1): 195–213 (May 2009)(“find[ing] a significant negative effect of a criminal record on employment outcomes that appears substantially larger for African Americans”); *available at* <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3583356/>.

Recognizing the effect of collateral consequences of a felony conviction, one court has emphasized the need for federal judges to account for such an impact at sentencing. *United States v. Nesbeth*, Case No. 1:15-cr-00018, 2016 WL 3022073, at *1 (E.D.N.Y May 24, 2016)(Block, J.)(varying downward from guideline range of 33 to 44 months imprisonment to one-year of probation for a drug defendant based in part on the number of statutory and regulatory consequences he faced as

a convicted felon). As *Nesbeth* establishes, the civil death that Mr. Jones faces due to his conviction constitutes significant punishment. *See also* Michelle Alexander, *The New Jim Crow* (2010); Wayne A. Logan, *Informal Collateral Consequences*, 88 Washington Law Review 1103 (2013)(“Today, convict status serves as a perpetual badge of infamy, even serving to impugn reputation beyond the grave”).⁵

Finally, Mr. Jones is haunted by remorse. *See* Ex. 1, *Letter of Aubrey Perry*. While his miserable state results from his own actions, a consideration of Mr. Jones’s condition is also important in terms of the punishment he has received for his crime. *See United States v. Prosperi*, 686 F.3d 32, 47-48 (1st Cir. 2012)(citing the district court’s observation that “sometimes [courts do not] fully recognize the anguish and the penalty and the burden that persons face when called to account, as these men are, for the wrong that they committed”).

Chapter 3 **Deterrence**

No punishment has ever possessed enough power of deterrence to prevent the commission of crimes.

Hannah Arendt, *Eichmann in Jerusalem*, Epilogue (1963)

The preceding established the proposition that a lengthy prison sentence is not necessary to accomplish the goal of just sentencing. In turn, this section

⁵ Notably, other probation offices, including the probation office in the Eastern District of New York, list the impact of collateral consequences as a ground for a variance in their PSRs.

addresses the question of whether a long prison sentence will accomplish the § 3553 factor of deterrence. Such an examination requires an analysis of both general and specific deterrence.

1. General Deterrence

The principle of general deterrence is based on the unsupported premise that lengthy prison sentences deter crime. This faulty conception has resulted in the mass incarceration of individuals in the United States.

For the past 40 years, the United States has been engaged in a vast, costly social experiment. It has incarcerated a higher percentage of its people, and for a longer period, than any other democracy. In fact, with 5 percent of the world's population, the U.S. is home to 25 percent of its prisoners.

Dr. Oliver Roeder et al., *What Caused the Crime Decline?*, Brennan Center for Just., 22-23 (Feb. 12, 2015), *available at* <https://www.brennancenter.org/publication/what-caused-crime-decline>.

The condition of mass incarceration is especially troubling since there is no correlation between punishment and reductions in crime. *See id*; *see also* Gary Kleck and J.C. Barnes, *Deterrence and Macro-Level Perceptions of Punishment Risks: Is There a "Collective Wisdom"?*, 59 *Crime & Delinquency* 1006, 1031-33 (2013). The United States Department of Justice agrees with the conclusion that incarcerating defendants is not an effective means of deterrence. *See* U.S. Dept. of Justice, Nat'l Inst. of Justice, *Five Things About Deterrence* (July 2014), attached hereto as Exhibit 3. In fact, the Department of Justice finds that even increasing

the severity of punishment does little to deter punishment. *See id.*

2. *Specific Deterrence*

Having established that prison sentences, regardless of length, have no impact on general deterrence, this section demonstrates that the factor of specific deterrence also supports Mr. Jones's request for a variance. The first part of this section focuses on studies establishing that incarceration has no effect on recidivism. The second part asserts that Mr. Jones' history and characteristics prove that he will never commit another crime.

a. *The relationship between incarceration and recidivism*

As in the case of general deterrence, empirical evidence does not establish a relationship between sentence length and specific deterrence, regardless of the type of crime. *See Nat'l Instit. of Corrections, Myths and Facts, Why Incarceration is Not the Best Way to Keep Communities Safe* (2016), attached hereto as Exhibit 4. The 2016 study conducted by the National Institute of Corrections (NIC) establishes three critical tenets regarding incarceration and specific deterrence. First, incarceration has a negligible impact on crime prevention. *See Ex. 4 at 4; see also Vera Instit. of Justice, Overview of The Prison Paradox: More Incarceration Will Not Make Us Safer* (July 2017)(concluding that research shows a "weak relationship between incarceration and crime reduction, and highlights proven strategies for improving public safety that are more effective and less expensive

than incarceration”).⁶ Instead, a longer prison sentence may actually lead to a greater risk of recidivism. *See id.*

Moreover, harsh penalties do not improve the long-term outcomes of the offender. Ex. 4 at 4. Longstanding research has found that imprisonment brings about negative individual-level changes that can harm re-integration upon release. National Research Council. *The Growth of Incarceration in the United States: Exploring Causes and Consequences*, (Nat’l Acad. Press 2014), available at <https://doi.org/10.17226/1861>.

Finally, the 2016 study concludes that community correction programs are more effective than incarceration in reducing recidivism. Ex. 4 at 5. *See also* R. S. Frase et al., *Criminal History Enhancements Sourcebook* (2015)(discussing studies establishing the crime that “custody is associated with higher rates of re-offending than community sentences”). Thus, the most effective to promote public safety is through broad use of non-incarceration sentences, especially since “incarceration does little to change a person’s behavior” and persons sentenced to prison have higher recidivism rates than those sentenced to community corrections. Ex. 4 at 1, 4.

b. Mr. Jones’s low risk of recidivism

⁶ The United States Sentencing Commission has determined that “[t]here is no correlation between recidivism and guidelines’ offense level. . . . While surprising at first glance, this finding should be expected. The guidelines’ offense level is not intended or designed to predict recidivism.” *See* U.S. Sent’g Comm’n, *Measuring Recidivism: The Criminal History Computation of the Federal Sentencing Guidelines*, at 15 (May 2004).

Mr. Jones has no criminal record, is college educated, has been employed throughout his life, is married, and does not have a substance abuse problem. Based on these factors, Mr. Jones poses an extremely low risk of recidivism. See U.S. Sent. Comm'n, *Measuring Recidivism: The Criminal History Computation of the Federal Sentencing Guidelines* at 12-13 (May 2004).

In imposing the least sufficient sentence to account for the need to protect the public from further crimes of Mr. Jones, this Court should consider the statistically low risk of recidivism presented by him. *United States v. Urbina*, slip op., 2009 WL 565485, *2-3 (E.D. Wis. Mar. 5, 2009) (considering low risk of recidivism indicated by defendant's lack of criminal record, positive work history, and strong family ties).

Chapter 4

Educational, Medical Care, or Other Correctional treatment

Judges carry the heavy burden of depriving individuals of their liberty. But the Bureau of Prisons shoulders the constitutional burden of protecting the remaining rights of the incarcerated while in custody.

United States v. Bardell, 634 F.Supp.3d 1083, 1084 (M.D. Fla. 2022).

Based on his education, lack of substance abuse, and employment history, Mr. Jones would not benefit from any educational, vocational or treatment programs in the Federal Bureau of Prisons (BOP).

Chapter 5

The Advisory Guidelines and the Kind of Sentences Available

Even a stopped clock is right twice a day. After some years, it can

boast of a long series of successes.

Marie von Ebner-Eschenbach, *Aphorisms* (1880)

The Presentence Report (PSR) calculates Mr. Jones's total offense level as a level 11 with a criminal history category of I.⁷ PSR at ¶ 63. Thus, Mr. Jones faces an advisory guideline imprisonment range of eight to 14 months. *Id.* at ¶ 63. Notably, Mr. Jones' advisory guideline range falls within Zone B of the Sentencing Table. Based on Mr. Jones' placement in zone B, the guidelines advise that this Court may sentence him to a term of probation which includes a condition of house arrest or community confinement. *See* USSG §5B1.1(a)(2).

Ordinarily, the undersigned would engage in an exhaustive, for some perhaps, a tedious critique of the sentencing guidelines. But because the guidelines support a probationary sentence in Mr. Jones' case, they have proven to be surprisingly rational.

In addition to the guidelines' support for Mr. Jones' requested sentence, the federal sentencing statutes also allow a probationary sentence. Indeed, a mandatory minimum sentence does not apply in Mr. Jones' case. Moreover, the statutes do not require a mandatory prison sentence since Mr. Jones has been convicted of a Class C felony. *See* 18 U.S.C. § 3561(c)(1). The federal statutes not only allow but also encourage a probationary sentence for Mr. Jones. *See, e.g.*, 28 U.S.C. § 994(j) (Congress stressed "the general appropriateness of imposing a

⁷ There are no objections to this guideline calculation.

sentence other than imprisonment in cases in which the defendant is a first offender who has not been convicted of a crime of violence or an otherwise serious offense.”).

Chapter 6 Disparity

In imposing a sentence, the Court must consider “the need to avoid unwarranted sentence disparities among defendants with similar records who have been found guilty of similar conduct; and”

18 U.S.C. § 3553(a)(6)

Regarding the goal of avoiding disparity in the sentences of defendants, this factor strongly supports Mr. Jones’ request for variance. To be sure, statistics from the United States Sentencing Commission demonstrate that for fraud defendants, like Mr. Jones, who are eligible for non-prison sentences, incarceration **was not** imposed in 81.0% of such cases in the Middle District of Florida in fiscal year 2024. *See* U.S. Sent’g Comm’n, *2024 Sourcebook of Federal Sentencing Statistics*, tbl.6, attached hereto as Exhibit 5.

Based on the statistics demonstrating the consistent imposition of non-prison sentences in fraud cases in the Middle District of Florida, Mr. Jones submits that his requested sentence of probation, which marks a minor variance from the guidelines in Zone B, is necessary to avoid unwarranted sentence disparities.

Chapter 7 Restitution

In imposing a sentence, the Court must consider “the need to provide restitution to any victims of the offense.”

18 U.S.C. § 3553(a)(7)

If Mr. Jones is incarcerated, his ability to pay restitution will be severely impacted. Conversely, a non-prison sentence will allow him to make restitution. *See* 18 U.S.C. §3553(a)(7). Thus, this § 3553 factor supports the imposition of a probationary sentence. *See United States v. Rangel*, 697 F.3d 795, 803-04 (9th Cir. 2012)(“the district court's goal of obtaining restitution for the victims of Defendant's offense is better served by a non-incarcerated and employed defendant”)(citation omitted).

CONCLUSION

After the rhetorical niceties and the endless citations, the fundamental question in Mr. Jones' case is whether justice will be accomplished with a sentence of imprisonment. Answering this question is an elusive task. But not an impossible one considering the unique circumstances of Mr. Jones' case – the circumstances that mitigate his crime and punishment.

Behind the limited and misleading narrative of an Indictment and PSR, there exists an entire life and history that transcends a rigid sentencing matrix. While the Indictment and PSR can only convey a limited narrative of criminal transgression, Mr. Jones' life is so much more. His life is a story of love and commitment.

In a life full of both failure and triumph, Mr. Jones' crime, an aberrant

episode in an otherwise exemplary existence, ensures that his future has been irrevocably damaged. Because such a harsh result is unavoidable, a probationary sentence is the only just result.

/s/ Fritz Scheller
Fritz Scheller
Florida Bar Number 183113

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel in this case on April 21, 2026.

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