

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES

:

v.

: Crim. No. 21-CR-291-1 (ABJ)

THOMAS F. SIBICK

:

**NOTICE**

Defendant, Thomas F. Sibick, through undersigned counsel, hereby submits the attached character letters in support of his Motion to Reopen Detention Hearing.

Respectfully submitted,

/s/

Stephen F. Brennwald, Esq.  
Bar No. 398319  
Brennwald & Robertson, LLP  
922 Pennsylvania Avenue, S.E.  
Washington, D.C. 20003  
(301) 928-7727  
(202) 544-7626(facsimile)  
E-mail: [sfbrennwald@cs.com](mailto:sfbrennwald@cs.com)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was sent by ECF, this 30<sup>th</sup> day of September, 2021 to all counsel of record.

/s/

Stephen F. Brennwald

27 September 2021

MEMORANDUM FOR THE HONORABLE COURT

FROM: DOUGLAS R. MOQUET, Jr., Esq.

(ADDRESS AND PHONE NUMBER DELETED BY DEFENSE COUNSEL)

SUBJECT: CHARACTER LETTER IN SUPPORT OF MR. THOMAS SIBICK'S RELEASE PENDING TRIAL

1. My name is Douglas Moquet, Jr. I am writing this letter in my personal capacity on behalf of my friend, Mr. Thomas Sibick. I am an active-duty Major (O-4) in the U.S. Air Force. I am currently stationed at Joint Base San Antonio—Randolph, TX and assigned as a Circuit Trial Counsel (Senior Prosecutor), Department of Air Force, Trial and Appellate Operations Division. In this position I represent the United States as lead counsel in felony criminal litigation at military installations globally. I have served in several assignments including tours as a military defense counsel and as a deployed Staff Judge Advocate conducting missions in Africa and Europe. I have earned awards such as the Meritorious Service Medal, three Air Force Commendation Medals, in addition to being named the #1 Judge Advocate in the grade of Captain (O-3) at the largest and busiest Air Force Base Legal Office in the world. Prior to commissioning, I graduated from Lehigh University in 2008 with a B.A. in International Relations and obtained a Juris Doctorate from St. John's University in 2013. I am licensed to practice law in the State of New Jersey (Attorney ID#088822013). Since 2014, I have been continuously employed as a Judge Advocate in the Active Duty U.S. Air Force. My views expressed in this letter do not represent the views of the Department of Defense, the U.S. Air Force, nor any official entity whatsoever. They are my views and my views alone.

2. I have known Mr. Thomas Sibick since 2002. We met as classmates at New York Military Academy (NYMA) – a small military boarding school in Cornwall, New York. Essentially a high school modeled after the United States Military Academy at West Point, NYMA provided a structured military training environment and prepared cadets for future service in both the public and private sectors. Mr. Sibick and I both earned leadership positions within the Corps of Cadets, where each of us were charged with the care and stewardship of over 300 lowerclassmen cadets. Additionally, Mr. Sibick and I forged a friendship as teammates on the varsity lacrosse team, where Mr. Sibick was a star midfielder. Mr. Sibick was not merely a talented athlete; his positive attitude and encouragement lifted team spirits out of many mid-game slumps. He was enthusiastic, possessed of good humor, and his optimism was infectious, especially in the face of adversity.

3. Since our graduation from NYMA, I have maintained regular contact with Mr. Sibick. We have celebrated each other's professional and personal milestones, to include Mr. Sibick's college graduation; his achievement of his M.B.A. in 2019; his relationship with his devoted girlfriend, Amanda; his mentoring of his youngest brother, Gregory, toward his acceptance at the United States Naval Academy; Mr. Sibick's internship and pursuit of a N.Y. state license to work in healthcare; and, notably, Mr. Sibick's successful treatment and rehabilitation from illicit drug use approximately ten years ago. Since high school, Mr. Sibick has grown into an imperfect but productive member of society—he is a citizen whose accomplishments shine despite the adversity he finds himself in now.

4. I am aware that Mr. Sibick is charged with serious criminal offenses, to include robbery and assaulting a Capitol law enforcement officer. If the allegations are true, I do not condone or support his behavior—nor any of the behavior of those associated with the 6 January 2021

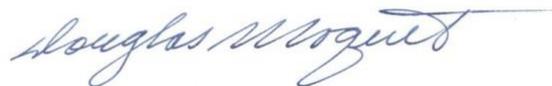
Capitol attack. I do believe, however, that my knowledge of Mr. Sibick's character is sufficient to recommend his release pending trial. I do not believe that Mr. Sibick is a threat to the community. To whatever extent Mr. Sibick was affiliated with the events of 6 January 2021, I believe his affiliation was as brief and unique as the event itself—a strange aberration of unusual circumstances unlikely to recur in Mr. Sibick's lifetime. These circumstances do not absolve any individual participations of responsibility; however, I believe the unique combination of provocation, timing, and hysteria far exceeded any propensity of Mr. Sibick to engage in criminal conduct.

5. I have been in touch with Mr. Sibick's family, to include his devoted mother, Carol, and his father, Captain Eugene Sibick, U.S.N. They have been in constant contact with Mr. Sibick and his attorney, providing every arrangement to ensure that if Mr. Sibick returns home, he will be supported and provided a stable environment. Additionally, I have been in contact with Mr. Sibick via letters since his incarceration. His experience has been stressful; yet Mr. Sibick remains optimistic. His compliance resulted in him earning the praise of his guards; he has earned extra privileges due to his model behavior. Mr. Sibick has placed renewed emphasis on religious faith and reading books. At no time did I detect a hint of resentment or animosity that would lead me to believe he poses a danger to the community if released. Mr. Sibick's model behavior demonstrates to me that he will comply with any conditions this Court may place upon him if released. In sum, I believe Mr. Sibick's character, his physical and mental condition, his family ties, employment, financial resources, length of residence in his community, and past conduct all favor release.

6. As a military prosecutor, I fully appreciate the Court's need to hold offenders accountable. Those who engaged in criminal behavior on 6 January 2021 should be tried and punished if convicted. However, I ask the Court to hold the Government to the highest burden in determining whether Mr. Sibick should be held without bail pending trial. To be sure, those who attacked our Capitol injured democracy that day. Still, I believe the health of our democracy will be measured not by that injury but rather by how we, as justice practitioners, respond. I humbly ask the Court to detain Mr. Sibick pending trial if, and only if, it judges Mr. Sibick a danger to any person or the community.

7. Please contact me if you have any questions or would like to discuss any matter contained in this letter. I can be reached at **(phone number and email address deleted by defense counsel)**.

Sincerely,

A handwritten signature in blue ink, appearing to read "Douglas M. Rogut". The signature is written in a cursive style with a long horizontal flourish extending to the right.

**Rahmat Loghmanieh**  
**(Address and Phone Number Deleted by Defense Counsel)**

September 26, 2021

To Whom It May Concern:

I am a 71 year old honorably discharged Veteran of the Vietnam War era. I am a retired Architect and sole proprietor of a Jewelry Store in the Village of Williamsville, New York.

Mr. Thomas Sibick and I have known each other for over eight years. We met at my jewelry store when Thomas was ready to get engaged and settle into his beautiful condominium in Williamsville, New York.

Clearly Mr. Sibick's appearance and demeanor was noticeable and an indication of a successful businessman who was ready to be a responsible and respected member of his generation and contribute in many positive ways to society.

Needless to say, the presence of his character and his appealing personality could not go unnoticed!

Mr. Sibick, is a fine gentleman with fantastic attributes and deserves great rewards in his future.

Thomas and I, have become wonderful friends since the very beginning and I am looking forward to maintaining this friendship for many years to come. I have also gotten to know his family, to include his brothers and parents who are very supportive of each other.

Sincerely,

*Rahmat Loghmanieh*

Rahmat Loghmanieh

Stephen F. Brennwald JD  
922 Pennsylvania Avenue SE  
Washington, DC 20003

September 26, 2021

To Whom It May Concern,

Along with my former husband retired New York State Supreme Court Justice Robert E. Whelan, it was our honor and privilege to watch Thomas Sibick grow up to become a fine young man. Attending his graduation from esteemed colleges first for an undergraduate degree and then for a graduate degree, I felt confident that this intelligent, kind man would proceed in life to make the world a better place to be.

That he did while working as a financial officer at a senior care facility he regaled us with stories of compassion while interacting with residents of that facility.

It is with confidence that I write this affirmation for Thomas Sibick the oldest son of a doctor and teacher, pillars of the community, who raised Thomas with their standards of highest religious beliefs and patriotism.

Mary Louise Mancuso  
Retired Teacher Lockport City Schools  
Lockport, NY 14094  
**(Address and Phone Number deleted by defense counsel)**

**JAMES J. CONTINO**  
**(Address deleted by defense counsel)**

September 28, 2021

Re: Thomas Sibick  
Application for Pretrial Release on Bond

United States District Court for the District of Columbia

This letter is sent in support of Thomas Sibick's application to the Court for pretrial release on bond.

Mr. Sibick is my wife's nephew, and I have known him since birth. Family, both immediate and extended, is a central pillar to which he has been moored his entire life. Over the years Thomas Sibick has consistently embraced his obligations and acknowledged the consequences of his actions.

In knowing and observing him over the years, he is not a person prone to violence. Further, in my opinion he will not flee if released from incarceration pending trial.

Very truly yours,

James J. Contino

I have known Mr. Thomas Sibick since January 2018 when he became employed in Niagara Falls where I was working as the Assistant Director of Rehabilitation/Physical Therapist Assistant. Mr. Sibick was the Business Office Administrator and when working with him for 1 1/2 years he would always be one of the hardest working employees in the building. Many of times residents living at the facility would tell me that they liked him a lot. After about a year, the corporate team for our facility at the time even had him oversee other buildings business offices. While working with Mr. Sibick we would go out with other staff members for food and drinks on a routine basis. We also had many good times together going to concerts with his personal friends. When I left Niagara in October 2019 for a full-time Director position, Mr. Sibick would call/text numerous times checking on how I was doing and if I liked the new position. At the beginning of 2021, Mr. Sibick contacted me about him completing his internship he needed at one of my nursing facilities. I set up an interview with the Administrator and the interview was a great success with the Administrator planning on hiring him. Thomas Sibick has always been very reliable professionally as a co-worker and a good person/friend over my time knowing him.

Andrew Joksimovic

September 27, 2021

Greetings,

This is a note to provide a character reference for Thomas Sibick. Our family has been his next door neighbor from 2001 until he moved out of the family home several years ago. Since then, he has been back frequently to have dinner with his family or to visit. Over the years, our relationship has grown into being a very close friendship with the family. We have enjoyed many celebrations of birthdays, graduations, holidays, and just, impromptu get-togethers in which Thomas was always present.

Thomas has always been very pleasant, respectful, and offering to help when the opportunity arose. I would go to his home to visit and many times he would let us know about his work at one of the local nursing homes and the stories that developed.

He was also in the process of going for his Master's degree to help further advance his career.

Thomas has strong family bonds that reach beyond his immediate family. His mother Carol and he have a very special, close relationship.

We understand that he is not perfect, but nobody is. We have 2 of our own children around the same age. However, what we do know is that if we needed anything, we were confident that we could have reached out to him, and he would have helped without hesitation.

We hope this gives a small glimpse of our experiences with Thomas, but if you have any additional questions, feel free to reach out to either of us.

Best regards,

Steve and Ann Sweet

**(Address, Phone Number and Email Address deleted by defense counsel)**