

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

UNITED STATES :
v. : Crim. No. 21-CR-291-1 (ABJ)
THOMAS F. SIBICK :

**DEFENDANT THOMAS SIBICK’S REPLY TO GOVERNMENT’S
RESPONSE TO DEFENDANT’S MOTION
FOR MODIFICATION OF CONDITIONS OF RELEASE**

Defendant Thomas F. Sibick, through undersigned counsel, Stephen F. Brennwald, in Reply to the Government’s Response to Defendant’s Motion for Modification of Conditions of Release, states as follows:

On January 26, 2022, defendant asked this Court to allow him to leave his parents’ home during the week to help an individual renovate two homes. He asked that he be released “on a curfew” between the hours of 9:30 a.m. and 5 p.m.

Counsel used the word “curfew” when discussing the particular hours of release not because he was seeking to eliminate the home confinement requirement this Court has imposed, but to specify the hours during which Mr. Sibick would be allowed to leave the home. His use of that term was not intended to signify a major change in his conditions of release.

In any event, the government seized on the use of the word “curfew” and concluded that the defendant was seeking to eliminate his condition of home confinement. He is not.

He is merely asking for permission to occupy his time by being productive, rather than by sitting around his parents’ home all day.

The government also notes in its response that the Pretrial Services Agency has not been able to verify the particular employment the defendant proposes to participate in. That concern is premature, as this Court has not yet indicated that it will consider the defendant’s request. The

defendant, of course, is more than happy to provide the Pretrial Services Agency, confidentially, with the name and phone number of the individual with whom the defendant would work. He has not yet done so in any filing, as he indicated in his initial motion, because of privacy concerns (both for himself and for that individual).

In light of the foregoing, the defendant asks this Court to permit him to leave his parents' home Monday through Friday between 9:30 a.m. and 5 p.m., and for permission to seek employment on a full-time basis as this case moves forward.¹

WHEREFORE, in light of the foregoing, defendant asks this Court to grant the foregoing relief, and for any other relief this Court may deem just and proper.

Respectfully submitted,

/s/

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¹ While this case has been pending for some time, the government is still in the process of providing discovery, and the Relativity database is still not fully populated with all of the evidence that may be relevant to the defense of this matter. As such, it will still be some months before the defendant, with the assistance of counsel, is able to determine which course to take.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was sent by ECF, this 11th day of February, 2022 to the U.S. Attorney's Office, 555 4th Street, N.W., Washington, D.C. 20530, and to all counsel of record.

/s/

Stephen F. Brennwald