

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-cr-291-1 (ABJ)
	:	
THOMAS F. SIBICK,	:	
	:	
Defendant.	:	

**CONSENT MOTION TO DOCKET REDACTED STATEMENT OF OFFENSE AND TO
SEAL UNREDACTED STATEMENT OF OFFENSE**

The United States of America, by and through the United States Attorney for the District of Columbia, respectfully moves for an order to publicly docket a redacted version of the Statement of Offense and to file under seal an unredacted version of the Statement of Offense during the plea hearing set for March 3, 2023.

In support thereof, the government states as follows:

1. The parties are scheduled to enter into a plea agreement on March 3, 2023.
2. The Statement of Offense, which both parties have signed, contains information from the victim’s medical records. To protect the victim’s privacy, the government is requesting that the version of the Statement of Offense filed to the public docket be redacted of information that was obtained from the victim’s medical records and that the unredacted version of the Statement of Offense be filed under seal.
3. Defense counsel, Stephen Brennwald, indicated that the defense does not object to the government’s request.

WHEREFORE, the United States respectfully requests that this Court issue an Order

directing that the Clerk of the Court publicly docket a redacted version of the Statement of Offense and to file under seal a redacted version of the Statement of Offense.

Respectfully submitted,

MATTHEW M. GRAVES
UNITED STATES ATTORNEY
D.C. Bar No. 481052

BY:

_____/s/_____
KIMBERLY L. PASCHALL
Assistant United States Attorney
Federal Major Crimes Section
D.C. Bar No. 1015665
601 D St, N.W.,
Washington, D.C. 20001
202-252-2650
Kimberly.paschall@usdoj.gov

_____/s/_____
CARA A. GARDNER
Assistant United States Attorney
D.C. Bar 1003793
U.S. Attorney's Office
601 D St, N.W.,
Washington, D.C. 20001
202-252-7009
Cara.Gardner@usdoj.gov

CERTIFICATE OF SERVICE

I certify that a copy of the Government's Consent Motion to Docket Redacted Statement of Offense and to Seal Unredacted Statement of Offense was served on all counsel of record via the Court's electronic filing service.

/s/ Cara Gardner
CARA GARDNER
Assistant United States Attorney

Date: March 2, 2023