

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

UNITED STATES OF AMERICA

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V.

CRIM. NO. 3:20-cr-00180-KAD

ARMANDO J. PEREZ

MARCH 29, 2021

DEFENDANT’S MEMORANDUM IN AID OF SENTENCING

The defendant, Armando “A.J.” Perez, is a 65-year-old, former police officer of 37 years, who faithfully served the Bridgeport community his entire adult life, before losing nearly everything over the last seven months—his career, his reputation, and most of his life’s savings—on account of his willingness to cheat during the Chief of Police Selection Process, and then lie about it to federal investigators. It is a cautionary tale that will be retold long after this case is over. What was supposed to be the crowning achievement of a public servant’s career, has instead been his undoing.

As he comes before the Court for sentencing—a first-time, nonviolent offender subject to an 18-24 month advisory guideline range—Mr. Perez is a humbled man. He has been shamed and vilified both locally and nationally, confronting multiple lawsuits that threaten the financial security of his family, including one brought by the Connecticut Attorney General to reduce and/or revoke his municipal pension—a particularly harsh consequence given that said pension was earned and vested in its entirety prior to the instant offenses.

As reflected in his acceptance of responsibility statement submitted as part of the presentencing process,¹ A.J. fully recognizes the wrongfulness of his conduct, and he fully appreciates that he has no one to blame but himself. Indeed, that is why, promptly after his arrest, he resigned and entered into a pre-indictment plea agreement, appearing before this Court to admit his guilt less than a month after his arrest. Another indication of both his total acceptance of responsibility and his desire not to unduly burden the system any more than necessary is the fact that he has already paid \$74,703.50 in restitution to the Clerk of Court to address his share of the restitution owed to the City of Bridgeport.

A.J. has demonstrated his acceptance in other ways as well. After his change of plea, outside counsel for the City identified additional potential losses sustained by the City in the form of expenses incurred during the underlying investigation. A.J. led the effort to address this additional restitution claim. Those efforts were ultimately successful, resulting in an agreement to pay the City an additional \$150,000, in a lump sum, jointly and severally with his co-defendant, Mr. Dunn. That agreement, coupled with the restitution amount included in the defendants' plea agreements, will result in \$299,407.00 being paid to the Clerk's Office prior to sentencing, making the funds immediately available to the City upon entry of a final restitution order by this Court. To accomplish this, A.J. and his wife liquidated most of their life's savings, leaving only a small portion (along with his pension and his wife's modest salary) to pay their mortgage and repay over \$125,000 in school loans for their children. Financially, the impact of

¹ A.J.'s personal statement regarding acceptance of responsibility has been provided to the U.S. probation office, to be included as an addendum to the PSR.

this case will have a lasting effect on A.J. and his family—a consequence that is incredibly punishing in its own right, especially for someone as proud and devoted to his family as A.J. is. The many letters of support accompanying this memorandum make that clear.²

By this memorandum, we urge the Court to impose a non-Guidelines sentence well below the advisory range. Such a sentence serves the goals of sentencing under 18 U.S.C. §3553(a), and it is justified in this case on a number of grounds.

First, A.J.’s personal history and characteristics—a significant factor under 18 U.S.C. § 3553(a)(1)—support a below-Guidelines sentence. A.J.’s entire life has been one of public service, commitment to his community, and devotion to his family. In his personal life, he is a gentle, trusted, and loyal husband, father, relative, and friend. A.J. shows love to everyone, even during difficult times, such as when his son made the difficult decision to publicly transition from living as a man to living as a woman. A.J. openly embraced his transgender child, publicly proclaiming his support at a gay pride parade covered by local media.³ In his professional life, he has risked his life as a patrol officer walking the beat in housing projects; investigated illegal trafficking and related crimes in the narcotics division; and supervised detectives solving violent crimes involving robbery, guns, assault, and homicide. All of this was done years before he was ever seriously considered for the Chief position, and it should weigh heavily in the Court’s analysis of what punishment is appropriate for his cheating and subsequent lying about an examination process that did not occur until the very end of his career.

² The character letters, with addresses and phone numbers redacted, are attached hereto as Exhibit A.

³ See “‘We love you’: Bridgeport police chief talks about his transgender child,” *Conn. Post*, June 15, 2020, available at <https://www.ctinsider.com/local/ctpost/article/I-said-We-love-you-Bridgeport-police-15341972.php> (last accessed Mar. 28, 2021).

Second, as noted above, A.J.’s sincere remorse, prompt and total acceptance of responsibility, and his extraordinary upfront efforts to pre-pay restitution stand out. This post-offense conduct, although not extraordinary, merits substantial consideration. As this Court knows, merely pleading guilty permits the Court to reduce a defendant’s total offense level under the Guidelines by three levels. But to earn that modest reduction a defendant need only admit the elements of the offense prior to trial, and also not frivolously deny any relevant conduct. Here, A.J.’s sincere acceptance, prompt resolution of his case, and his proactive payment of full restitution is atypical, and substantially mitigating.

Third, although we do not dispute that there was a financial loss to the City—which has now been addressed through restitution—pecuniary gain was not A.J.’s primary motivation. At the time he applied to be Chief of Police, A.J. was fortunate to enjoy a good salary and benefits—both as a senior police captain with over three decades of experience, and as Acting Chief—and his compensation did not change substantially as a result of his appointment to the permanent Chief position in 2018.⁴ Viewed in this context, it seems clear that any modest increase in his base salary did not drive A.J. to commit his crimes. Rather, in choosing to pursue to the Chief job before retiring, A.J. coveted one, final reputational achievement before his retirement.

Fourth, the goals of sentencing have largely been achieved through the very public nature of the prosecution and the severe and life-altering financial consequences

⁴ The Chief of Police position “came with a salary range of \$132,374 to \$145,428, plus benefits,” while A.J.’s yearly earnings as a police captain in the years before his appointment were “\$159,672.45 in 2012, \$137,354.77 in 2013, \$186,837.90 in 2014, and \$196,444.85 in 2015 (the last full year before his appointment as Acting Chief on March 1, 2016).” A.J. “earned \$160,004.51 in 2016, \$138,025.80 in 2017, \$150,994.86 in 2018 (the year he was appointed Chief), and \$154,081.34 in 2019.” PSR ¶¶92.

to A.J. and his family as a result of this case and the various civil litigations that have arisen in its wake. If A.J.'s motivation was reputational achievement, having its fruits stripped from him in a very public, costly, and shaming way is an appropriate punishment. Such a "civil death" is not something experienced by every criminal defendant, and it is a powerful form of punishment. *See United States v. Nesbeth*, 188 F. Supp. 3d 179, 180 (E.D.N.Y. 2016) ("my research and experience over two decades as a district judge, sufficient attention has not been paid at sentencing by me and lawyers—both prosecutors and defense counsel—as well as by the Probation Department in rendering its pre-sentence reports, to the collateral consequences facing a convicted defendant"); *id.* at 181 (discussing the concept of the "civil death" attendant to criminal convictions).

Fifth, while we agree that it is important to send a message that public officials will be punished for corrupt acts and lying, deterrence does not always require the imposition of a lengthy incarceration sentence. Even in very high-profile cases that involve people in positions of trust—even those who made false statements to the FBI—courts have seen fit to impose probation sentences, or below-Guidelines sentences of less than one year. For example, in *United States v. Scinto*, 3:10-cr-00207-CSH (D.Conn.), a well-known Fairfield County real estate developer illegally provided gifts to curry favor with public officials and City of Shelton employees over a period of **nine years**. *See Scinto*, ECF No. 29, at 2 (conduct occurred from 1999-2008). Scinto pled guilty to making a false statement under 18 U.S.C. §1001 and faced a sentencing range of 21-27 months according to the PSR. Rather than impose a lengthy sentence within this range, the Court rejected the guideline calculation used in the PSR and instead

imposed a sentence of 6 months, followed by 24 months of supervised release. During the first six months of supervised release, Mr. Scinto was placed on home confinement with electronic monitoring. See *Scinto*, ECF No. 31. More recently, in *United States v. Clinesmith*, 20-CR-165 (JEB) (D.D.C.), the court sentenced the FBI lawyer who admitted to doctoring an email that was used to justify secret surveillance of a former Trump campaign adviser to only 12 months of probation, instead of a split sentence. The straight probationary sentence was imposed even though the Government, citing the goal of deterrence, requested a sentence of incarceration. The sentencing court did, however, require Clinesmith to perform 400 hours of community service during the 12 months. See *Clinesmith*, ECF No. 46, at 4.

Sixth, A.J. has never been subject to a criminal sentence before in his life. Accordingly, as noted by the U.S. Probation Office, “[a]s a basis for a downward variance, the Court may consider incremental punishment and the custodial range provided in the advisory guideline calculation as greater than necessary to achieve the goals of sentencing.” PSR ¶118. This is another way of saying that the Court can show mercy when an offender faces unduly harsh consequences under the Guidelines. To reach a more just sentence, the Court can consider a lower sentence, as well as non-custodial sentencing options (including probation, supervised release, home confinement, community service hours, or a fine) in lieu of, or in combination with, a substantially reduced period of incarceration.

Finally, the Court must consider the need for the sentence to provide A.J. with medical care in the most effective manner, see 18 U.S.C. §3553(a)(2)(D), a goal of sentencing that cannot be accomplished through imprisonment. See *Tapia v. United*

States, 564 U.S. 319, 330 (2011) (“Do not think about prison as a way to rehabilitate an offender.”). As the Court is aware, A.J. is 65 years of age and he suffers from hypertension, both of which make him susceptible to serious complications from COVID-19. Although he may be fully vaccinated soon, sending him to prison would likely increase the likelihood of contracting the disease, or one of its variants, due to the uniquely challenging conditions faced by our prisons during this dangerous time. Indeed, it is now well established that prisons have been unable to adequately protect inmates once the virus has been introduced into a prison environment. In addition, as the Court is now aware, A.J. has been struggling privately with another medical issue for which he has received testing and treatment. See PSR ¶¶84. This condition is potentially very serious and needs to be carefully monitored over the next 12-18 months to determine if the condition is getting worse. Allowing him to remain in the community as much as possible to receive the necessary treatment will allow his wife and medical providers to closely monitor his condition.

In the end, after weighing all of the §3553(a) factors—and especially in light of the punishment and collateral consequences that A.J. has experienced already—we respectfully submit that non-Guidelines sentence substantially below the advisory range, with a period of home confinement in lieu of complete incarceration, and a joint and several restitution order of \$299,409, is a just sentence that is sufficient but not greater than necessary to achieve the goals of sentencing in this case.

Argument

A sentencing court is obligated to fashion a sentence that is “sufficient, but not greater than necessary” to accomplish the goals of sentencing under 18 U.S.C.

§3553(a). As a procedural matter, “[a] district court should begin all sentencing proceedings by correctly calculating the applicable Guidelines range.” *United States v. Dorvee*, 616 F.3d 174, 180 (2d Cir. 2010) (quoting *Gall v. United States*, 552 U.S. 38, 49 (2007)); *see also Rita v. United States*, 551 U.S. 338, 351 (2007). Next, the court must determine whether or not to apply any of the Guidelines’ departure policy statements to adjust the Guideline range. *See generally* U.S.S.G. §1B1.1(a)-(c). “[A]fter giving both parties an opportunity to argue for whatever sentence they deem appropriate, the district judge should then consider all of the §3553(a) factors to determine whether they support the sentence requested by a party,” including whether a non-Guidelines sentence is warranted. *See Gall*, 552 U.S. at 49-50; *see also Dorvee*, 616 F.3d at 174. “In so doing, [the district judge] may not presume that the Guidelines range is reasonable,” but instead he should “make an individualized assessment based on the facts presented.” *Gall*, 552 U.S. at 50. “After announcing the sentence, the judge ‘must adequately explain the chosen sentence to allow for meaningful appellate review.’” *Dorvee*, 616 F.3d at 174 (quoting *Gall*, 552 U.S. at 50); *see also Rita*, 551 U.S. at 356-57 (“when a judge decides simply to apply the Guidelines to a particular case, doing so will not necessarily require lengthy explanation”).

“Wide latitude is afforded to sentencing courts in crafting sentences ‘sufficient, but not greater than necessary’ to achieve the sentencing objectives set forth by Congress.” *United States v. Stewart*, 686 F.3d 156, 173 (2d Cir. 2012). Moreover, a sentence that is “sufficient, but not greater than necessary” under 18 U.S.C. §3553(a) is the **lowest possible sentence** that accounts for all of the relevant statutory factors. In other words, if a district court believes a lower sentence will be as effective as a higher

sentence in light of the relevant factors, it must choose the lower sentence. See *United States v. Ministro-Tapia*, 470 F.3d 137, 142 (2d Cir. 2006) (“if a district court were explicitly to conclude that two sentences equally served the statutory purpose of § 3553, it could not, consistent with the parsimony clause, impose the higher.”).

I. THE SENTENCING FACTORS UNDER 18 U.S.C §3553(a) SUPPORT A NON-GUIDELINE SENTENCE SUBSTANTIALLY BELOW THE ADVISORY RANGE

In determining what sentence will best achieve these statutory purposes of sentencing, the Court must consider the following factors:

1. The nature and circumstances of the offense and the history and characteristics of the defendant;
2. The kinds of sentences available and the applicable sentence under the Sentencing Guidelines;
3. Pertinent policy statements issued by the Sentencing Commission;
4. The need to avoid unwarranted sentence disparities among similar defendants guilty of similar conduct; and
5. The need to provide restitution to any victims.

18 U.S.C. § 3553(a)(1), (a)(3) - (a)(7).

When considering each of the statutory factors under §3553(a), the U.S. Supreme Court has made it clear that the sentencing process should focus carefully on the individual, and not merely on the crime itself. “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. Underlying this tradition is the principle that the punishment should fit the offender and not merely the crime.” *Pepper v. United States*, 562 U.S. 476, 487-88 (2011) (internal citations and quotations omitted); see also *Pennsylvania ex rel. Sullivan v. Ashe*, 302 U.S. 51, 55 (1937) (“For the determination of sentences, justice generally requires consideration of

more than the particular acts by which the crime was committed and that there be taken into account the circumstances of the offense together with the character and propensities of the offender”).

A. Mr. Perez’s Life of Public Service, Dedication to Family, and Recent Medical Issues

Until the events of this case, A.J. was one of Bridgeport’s many immigrant success stories. He was born in Cuba, just before the communist movement led by Fidel Castro overthrew the government of Fulgencio Batista in 1959. Castro immediately nationalized businesses and began attacking potential political opponents and Batista supporters. A.J.’s father was in the military and was a weapons expert in the Batista government. Because his father refused to teach his knowledge of weapons to those in the Castro military, he was forced to leave the military. He worked briefly at the United Illuminating Company but was eventually fired for not cooperating with the regime, and afterwards the family struggled financially.

A.J.’s family then made the difficult choice to leave Cuba, immigrating to the United States when A.J. was only 12. They settled in Bridgeport to be near relatives. The change in culture was a challenge for A.J., and nothing came easy. When he arrived, he spoke no English. As a result, even though he had already completed the 8th grade in Cuba, he was placed back in the 5th grade when he started school in the Bridgeport public school system. Despite the stigmatizing effect of this early grade school placement, A.J. persevered. He applied himself, learned English, succeeded in school, and graduated from Kolbe High School (now Kolbe Cathedral High School) in 1976 at the age of 20.

After a year of college, and working other jobs to help support his family and two younger brothers, A.J. finally found his calling as a Bridgeport police officer in 1983. He started out as a patrol officer, walking the beat in Father Panik Village, a housing project notorious for illegal drugs and violence. In 1988, the Associated Press described it as a “battlefield,”⁵ with the frequent echoes of gunshots, drug deals on street corners, walls marked with graffiti, and “hallways smell[ing] of urine.”⁶ Being an officer in Bridgeport in the 1980s was a rough and dangerous job, and A.J.’s experience was no exception. Over the years, he slowly and steadily worked his way up through the department, receiving promotions to sergeant (1990-2001), lieutenant (2001-2009), and then captain (2009-2016). Throughout that period of time, A.J. served in various critical roles at the department. He was Executive Officer for the Office of Internal Affairs (1994-2001), Executive Officer to the Chief of Police (2001-2005), Commanding Officer of the Narcotics and Vice Division (2009-2014), and Commanding Officer of the Detective Bureau (2014-2016).

In 2016, A.J. was named the Acting Chief of Police. As Acting Chief, A.J. displayed all of the traits that one would expect to see in a dedicated public servant. Those who interacted with him commented on his personal style, his deep commitment to the community, and his availability whenever someone needed help. When interviewed by the Connecticut Post in 2018, several City Council members praised A.J. for these qualities, stating that they “had never met a person who cares about this city like Chief Perez does,” they were impressed how his “door is always open,” and one

⁵ See www.apnews.com, “Father Panik Village Still Plagued By Crime, Money Problems,” (Apr. 2, 21988), available at <https://apnews.com/article/d3a64f1081322347f791ea177f3187e8> (last accessed Mar. 28, 2021).

⁶ *Id.*

Council member noted “several times that she has approached the acting chief on behalf of one of her constituents and his response has been, ‘Here’s my card. Have (them) call me directly.’”⁷ No matter what is said about A.J. Perez now, no one can question his deep commitment to the job, to the Department, or to Bridgeport and its citizens.

While he was Acting Chief, he also worked extremely hard to change the culture of violence that plagued the City of Bridgeport. As a true believer in community policing, he was visible in the community, seeking to engage members of the clergy (of all denominations), community activists, and various neighborhood groups, to stop the violence and address street crime. He was also an early supporter of various forms of technology within the police department. For example, during his tenure, the City was able to establish a Real Time Fusion Center with high definition cameras in all of the City schools and hot spots. He was also an avid supporter of body cameras for officers. In fact, today, all uniformed officers have body cameras, as well as cameras in their patrol vehicles.

Notwithstanding the events that underlie the instant case, A.J.’s commitment to the Chief position mirrored the commitment he demonstrated as Acting Chief. A.J. led the Bridgeport Police Department during the COVID-19 pandemic, one of the most challenging times in recent memory for local government, the country, and the world. From March 2020 up until his resignation in September 2020, he worked tirelessly to keep his officers safe, he adapted the department to the needs of the community, and

⁷ See “Ganim makes Perez Bridgeport's permanent cop chief,” Conn. Post (Nov. 5, 2018), available at <https://www.ctpost.com/local/article/Ganim-makes-Perez-Bridgeport-s-permanent-cop-13364763.php> (last accessed Mar. 28, 2021).

he worked collaboratively with municipal agencies to ensure that the City's residents were kept safe. In other words, his compassion for the City and its residents was on full display.

Of course, all of this hard work was not without personal sacrifice. A.J. was always on the go, answering a call, running down to the police station, or attending a City meeting. One of his wife's close friends, Krystal Taylor, described how the demands of A.J.'s job impacted his family:

As time progressed and I became closer to their family, I understood the impact that AJ's position had on their family. Similar to when someone serves in the armed forces and their family feels the effect of that, AJ's family served with him. There were many times that AJ had to set aside his family to serve the citizens of Bridgeport. There were holidays, birthdays, family dinners, and many cancelled family vacations, where AJ was called on by his officers and he went, to serve by their sides, not to just give commands but actively be there with them. His family understood and supported him with love.

Ltr. from K. Taylor, BSN, RN.

The observations made by Ms. Taylor are consistent with the other observations mentioned in the character letters submitted to the Court. These letters describe a person who has a "boundless love for his family,"⁸ "who truly, and passionately, embraced his law enforcement calling,"⁹ with "compassion for the residents of Bridgeport,"¹⁰ who "always displayed a deep empathy for the Bridgeport community."¹¹ He was "a dedicated community leader."¹²

⁸ Ltr of Isabel Del Pino Allen ("His absolute and publicly proclaimed acceptance and love for his transexual daughter evidences the strength and kindness of his character.").

⁹ Ltr. of Michelle Armstrong.

¹⁰ Ltr .of Letha Dardani.

¹¹ Ltr. of Lydia Martinez.

¹² *Id.*

A.J.'s arrest and prosecution have come as a shock to his family and those closest to him, and A.J. is obviously disappointed with himself and with the personal weakness he displayed in deceiving the Selection Committee, and then lying to law enforcement to avoid the shame and consequences of what he did. It is a fall from grace that has been punishing and painful.

Unfortunately, in addition to the stress and anxiety associated with this prosecution and its attendant consequences, A.J. has received devastating news that he has another medical condition that could be very serious. As the Court knows from the report submitted the U.S. Probation Office, the symptoms A.J. has been experiencing have been progressing slowly. Careful monitoring by his family and medical providers, coupled with another re-evaluation in the next 12-18 months, will be critical in assessing the extent of the condition. In light of this diagnosis, A.J. is even more determined to spend as much time as possible with his family, and every moment is now that much more precious.

It has been said that the most agonizing pain is the pain of regret, for which there is no lasting relief and no remedy. A.J. is deserving of punishment for his crimes, but he is being punished already. Today, instead of living out his retirement as a pillar of his community with the distinction of being the first Hispanic Chief of Police of the City of Bridgeport, A.J. faces his retirement years as a pariah and litigation target, without any lasting relief from the consequences of his own criminal conduct. He continues to face financial uncertainty after liquidating much of his savings, and he faces civil litigation that could result in court ordered attachments of his remaining assets and the revocation of his pension—all the while living with the possibility that his more recent

medical condition may get worse, leaving his family with an even greater financial and emotional burden to bear in the future. These are undoubtedly harsh consequences for crimes that involved cheating during an examination process in pursuit of a promotion, and then lying about it.

B. Nature and Circumstances of the Offense

The Information and the PSR summarize the conduct that underlies A.J.'s convictions. And there is no dispute about what happened when it comes to A.J.'s involvement. He cheated during the process, and then lied about it afterward.

The Selection Process involved four discrete stages: (1) submission of a resume and cover letter, (2) a written examination that involved an employment questionnaire about the applicant's experience and two essay questions, (3) an oral examination by telephone, and (4) a final interview with an independent, five-member panel. A total of 16 candidates applied for the position. At the end of this process, the panel was supposed to recommend three of the candidates, from which the mayor would select the next Chief of Police. If A.J. was not in the final three, he would not even be eligible to be appointed.

During the initial stages of the process, A.J. took steps on his own to make sure he could get through to the next stage. Specifically, he relied on assistance from two fellow officers to prepare his cover letter and resume, and these same officers helped him complete the questionnaire and the essay questions. A.J. did not issue an order to these officers that they do this for him—in fact, he thought they did so willingly—but he did not disclose that he received this help. Using others to substantially complete portions of the written examination was also contrary to the examination's instructions,

which stated: “This questionnaire represents a testing process (points will be assigned so complete all questions) and as such you are to complete it yourself.” PSR ¶18.

To ensure that A.J. made it into the top three, David Dunn made changes that benefitted A.J. Among other things, he modified the search criteria to eliminate any requirement that the candidate have a college degree (A.J. did not have a college degree); he arranged for an officer’s experience to have significant weight in the scoring (A.J. had many years of police officer training and experience); and he shared with A.J. (and only A.J.) a list of possible test questions in advance of both the telephone oral examination and the final panel interview, thereby giving A.J. an advantage in the process that others did not receive. Dunn also allegedly telephoned a member of the five-member panel to tell him that the Mayor wanted A.J. to be “in the top three.” PSR ¶28. When interviewed about it, the panelist denied that this comment from Dunn affected his own decision-making, but the statement obviously was consistent with the overall objective pursued by A.J. and Dunn.

Whether the test questions and other assistance provided by Dunn were what ultimately carried A.J. into the top three cannot be known for sure, but A.J. agrees that he willingly agreed to, and accepted, the help that he received. As noted in his personal statement, he allowed his personal ambition and self-serving rationalizations—such as the well-worn sentiment about “how things are done in Bridgeport”—to cloud his better judgment, as well as lifetime commitment to honoring and upholding the law.

A.J.’s conduct also included lying. When initially confronted by agents in February 2019, A.J. deflected and denied that he had received “confidential information,” testing questions, or other information “that would give him an advantage

over other candidates....” PSR ¶¶35. When he was re-interviewed in May 2020, this time with his attorney, A.J. made false statements, including denials of facts that were supported by secret recordings provided to law enforcement by one of the police officers who had helped A.J. during the examination process. See PSR ¶41.

Why did he lie? To avoid the consequences of his wrongful conduct and to prevent the world from knowing that the process had been corrupted and that he did not get the Chief of Police position “all on his own.” He was desperate for those facts not to come out. In his acceptance of responsibility statement to the Court, he acknowledged this motivation and he made it clear that he knows that there must be consequences: “As a police officer, I understand the importance of honesty and not lying to investigators. In choosing to lie, I further damaged my reputation and dishonored on all those who have loved and supported me throughout my career.”

C. The Guidelines and The Kinds of Sentences Available

The plea agreement and the PSR each calculate the applicable Guideline range to be 18 to 24 months of imprisonment. See PSR ¶¶102. Because this range is in Zone D, probation is not authorized by the Guidelines. See PSR ¶109; U.S.S.G. §5B1.1. However, under the applicable statute, A.J. is eligible for not less than one nor more than five years’ probation because his offenses are only Class D Felonies. See PSR ¶107; 18 U.S.C. § 3561(c)(1).

Contrary to popular perception, the non-custodial portion of a sentence—whether it is straight probation or period of supervised release—is indeed “punishment” under our federal sentencing laws, and should be actively considered by the Court when fashioning a sentence. In *Gall v. United States*, the U.S. Supreme Court squarely

rejected the notion that probation and other non-custodial sentences are not punishment under 18 U.S.C. §3553(a):

Offenders on probation are nonetheless subject to several conditions that substantially restrict their liberty . . . Inherent in the very nature of probation is that probationers do not enjoy the absolute liberty to which every citizen is entitled . . . Probationers may not leave the judicial district, move, or change jobs without notifying, and in some cases receiving permission from, their probation officer or the court. They must report regularly to their probation officer, permit unannounced visits to their homes, refrain from associating with any person convicted of a felony, and refrain from excessive drinking. Most probationers are also subject to individual "special conditions" imposed by the court.

Gall, 552 U.S. at 48-49; see also ABA Standards on Criminal Justice, Sentencing 18-6.4(a), p. 227 (3rd ed. 1994) ("A sentencing court should prefer sanctions not involving total confinement in the absence of affirmative reasons to the contrary.").

In addition to the Supreme Court, Congress has observed that alternatives to incarceration should be explored prior to imposing a sentence of imprisonment. As part of the Sentencing Reform Act of 1984, Congress recognized "the general appropriateness of imposing a sentence other than imprisonment" where, as here, the defendant has no criminal history and is convicted of a non-violent offense. Thus, even before the unique concerns surrounding a defendant's risk of serious infection or death from COVID-19, a sentence of probation and restitution, with conditions, was deemed consistent with Congressional intent and the purposes of 18 U.S.C. §3553(a).

As a condition of probation, the Court can also impose a requirement of home detention in lieu of incarceration, in addition to ordering community service hours. The hours should not, however, be in excess of 400 hours. See U.S.S.G. 5F1.3 cmt. n. 1

(recommend that “[c]ommunity service generally should not be imposed in excess of 400 hours.”).

D. No Unwarranted Disparity Will Be Created By A Below-Guidelines Sentence

Pursuant to §3553(a)(6), a sentencing court must also take into account “the need to avoid unwarranted sentencing disparities among defendants with similar records who have been found guilty of similar conduct,” and this extends to defendants sentenced within the same case. *See Gall*, 128 S.Ct. at 600; *see also United States v. Wills*, 476 F.3d 103, 109 (2d Cir. 2007) (“the plain language of §3553(a)(6) does not on its face restrict the kinds of disparity a court may consider”); *United States v. Fernandez*, 443 F.3d 19, 31 n. 9 (2d Cir. 2006) (same). Whether any difference among sentences is warranted, or unwarranted, depends on the individual circumstances of each case and their relationship to the purposes of sentencing. “Unwarranted disparity is defined as different treatment of individual offenders who are similar in relevant ways, or similar treatment of individual offenders who differ in characteristics that are relevant to the purposes of sentencing.” U.S. Sent. Comm’n, *Fifteen Years of Guidelines Sentencing: An Assessment of How Well the Federal Criminal Justice System Is Achieving the Goals of Sentencing Reform*, at 113 (2004).¹³ Thus, while this factor calls for equal treatment for similarly situated offenders, “it is worth noting that equal treatment consists not only of treating like things alike, but also of treating unlike things differently according to their differences.” *United States v. Irej*, 612 F.3d 1160, 1205 (11th Cir. 2010) (en banc).

¹³ Available at https://www.ussc.gov/sites/default/files/pdf/research-and-publications/research-projects-and-surveys/miscellaneous/15-year-study/15_year_study_full.pdf (last accessed Aug. 18, 2020).

Here, no unwarranted disparity would be created by a sentence well below the advisory range. Indeed, national sentencing data shows that nearly a quarter of all defendants in A.J.'s advisory range are actually sentenced to probation instead of imprisonment. Nationally, U.S. Sentencing Commission data for fiscal years 2015-2019 for defendants sentenced under U.S.S.G. §2B1.1, who, like A.J., are also 60 years of age and in Zone D of the Sentencing Table, 24% (503 cases) received probation, or probation with alternatives to incarceration.¹⁴ In the Second Circuit, for defendants with this same criteria, 21% (40 cases) received a probationary sentence.¹⁵ In the District of Connecticut, probationary sentences for elderly defendants in this range were imposed in 37.5% of the reported cases.¹⁶

Below-Guideline sentences have also been imposed in other high-profile public corruption cases in this District. As previously noted, in *United States v. Scinto*, 3:10-cr-00207-CSH (D.Conn.), a well-known Fairfield County real estate developer who illegally provided gifts to public officials over a period of nine years, and then lied to the FBI about it in violation of 18 U.S.C. §1001, was sentenced to 6 months of imprisonment, followed by 2 years of supervised release, with the first six months on home confinement with electronic monitoring. See *Scinto*, ECF No. 31.

Thus, even though it is critically important that public officials be truthful, especially when they are interviewed in a federal investigation, a non-Guidelines sentence can address this criminal conduct, and it will not generate unwarranted disparities.

¹⁴ See U.S. Sent'g Comm'n, Interactive Data Analyzer, available at <https://ida.ussc.gov/analytics/saw.dll?Dashboard>.

¹⁵ See *id.*

¹⁶ See *id.*

E. The Need for Restitution Has Been Satisfied

This is always an important factor in a case involving fraud and a claimed loss to the victim. Here, as noted above, A.J. and his co-defendant, David Dunn, have prepaid the restitution agreed to in their plea agreements, and they have reached an agreement with the City of Bridgeport to reimburse the City for cost and expenses associated with the investigation. The total amount of this restitution, \$299,407.00, will be deposited in the Clerk's Office at the time of sentencing.

II. THE GOALS OF SENTENCING SUPPORT A NON-GUIDELINES SENTENCE WELL BELOW THE ADVISORY RANGE

The sentence to be imposed on Mr. Perez must comply with “the four identified purposes of sentencing: just punishment, deterrence, protection of the public, and rehabilitation.” *Dean v. United States*, 137 S. Ct. 1170, 1175 (2017); see also *Gall*, 552 U.S. at 50, n. 6; 18 U.S.C. § 3553(a)(2)(A)-(C). The sentencing statute also mandates consideration of the need “to provide the defendant with needed educational or vocational training, medical care, or other correctional treatment in the most effective manner.” 18 U.S.C. §3553(a)(2)(D).

A. Just Punishment

The concept of “just punishment” under §3553(a)(2)(A) refers to the need for a defendant’s punishment to fit the crime. In the Senate Report accompanying the Sentencing Reform Act, the Act's sponsors explained:

[Just punishment]—essentially the “just deserts” concept—should be reflected clearly in all sentences; it is another way of saying that the sentence should reflect the gravity of the defendant's conduct. From the public's standpoint, the sentence should be of a type and length that will adequately reflect, among other things, the harm done or threatened by the offense, and the public interest in preventing recurrence of the offense. From the defendant's standpoint the sentence should not be unreasonably

harsh under all the circumstances of the case and should not differ substantially from the sentence given to another similarly situated defendant convicted of a similar offense under similar circumstances.

S. Rep. 98–225, 1984 U.S.C.C.A.N. 3182, 3258–59.

A.J.’s arrest and prosecution has destroyed his reputation and jeopardized the financial security of his family. Having the reputational achievement that he coveted stripped from him in a very public, costly, and shaming way is “just” under the facts of this case. It is also appropriate to have A.J. reimburse the City of Bridgeport for the losses directly attributable to his actions, which he has now done. Given the severity of these consequences, and the reality that he is struggling with a medical condition that may well rob him of any enjoyment of his future years, a lengthy period of incarceration is not needed.

B. Deterrence

Section 3553(a)(2)(B) instructs the Court to consider whether the sentence provides adequate deterrence to criminal conduct. This concept embodies two related concepts: general deterrence (deterring the public from crime) and specific deterrence (deterring the defendant from future criminal behavior).

The National Institute of Justice—the research, development and evaluation agency of the U.S. Department of Justice—has noted the following about deterrence theory:

1. “The certainty of being caught is a vastly more powerful deterrent than the punishment.”
2. “Sending an offender to prison isn’t a very effective way to deter crime.”
3. “Police deter crime by increasing the perception that criminals will be caught and punished.”

4. “Increasing the severity of punishment does little to deter crime.”¹⁷

Applying this research, general deterrence is accomplished in this case, first and foremost, by the fact of A.J.’s prosecution and the publicity surrounding the consequences to him. If cheating and lying in connection with a government civil service examination process to obtain an employment contract will result in these kind of consequences, employment candidates will surely seek to avoid what A.J. has gone through. He is a walking, living, breathing cautionary tale of what ***not*** to do when applying for a Government promotion or contract.

The Government will surely raise the issue of his lying to law enforcement and the need for deterrence as to that particular crime. And they would be right. But a lengthy sentence of incarceration is not automatically required. As noted by the court’s 12-month probation sentence in the *Clinesmith* case, *supra*, and the 6-month incarceration sentence in *Scinto*, deterrence can be achieved in other ways.

C. Protection of the Public

Pursuant to 18 U.S.C. §3553(a)(2)(C), the Court must also consider whether a particular sentence is needed “to protect the public from further crimes of the defendant.” As noted above, A.J. is 65 years old, he has no criminal record, and is suffering from a progressive neurological disorder. He is not a risk to anyone at this point, and we suspect that even the Government will agree that a sentence of incarceration is not needed to serve this particular goal.

¹⁷ See NIJ, “Five Things About Deterrence (citing Daniel Nagin, “Deterrence in the 21st Century,” in *Crime and Justice in America 1975-2025* (ed. Michael Tonry, Univ. Chicago Press, 2013), available at <https://www.ncjrs.gov/pdffiles1/nij/247350.pdf>. The fifth finding about deterrence—that “[t]here is no proof that the death penalty deters criminals”—is not applicable here.

D. Rehabilitation

Pursuant to 18 U.S.C. §3553(a)(2)(D), courts also must consider the need “to provide the defendant with needed educational or vocational training, medical care, or other correctional treatment in the most effective manner.” In fulfilling this objective, it is widely acknowledged that imprisonment is not to be used as vehicle by which to achieve rehabilitation. See *Tapia*, 564 U.S. at 330 (lengthening sentence to “promote rehabilitation” violates §3582(a)); *id.* (“Do not think about prison as a way to rehabilitate an offender.”); *United States v. Anderson*, 15 F.3d 278, 282 (2d Cir. 1994) (discussing 18 U.S.C. § 3582(a) and 28 U.S.C. § 994(k)).

In addressing this goal of sentencing, the Court should carefully consider any risks to a defendant’s health if he is incarcerated. This presents a unique challenge given the ongoing nature of the COVID-19 pandemic. Courts have already recognized that CDC guidance, such as social distancing, is simply “impossible to achieve in our federal prisons”—particularly during a lockdown. See *Martinez-Brooks v. Easter*, No. 3:20-CV-00569 (MPS), 2020 WL 2405350, at *23 (D. Conn. May 12, 2020) (“even with the measures that the Warden has put in place, due to the impossibility of adequate social distancing, confinement at FCI Danbury—due to the very structure of the facility—continues to pose a grave risk to vulnerable inmates’ health”). Incarcerated individuals share bathrooms, sinks, showers, and telephones. They eat together, and sleep in close proximity to each other. They lack the freedom to bathe regularly and are unable to effectively disinfect their surroundings. Unsurprisingly, these conditions have fueled the spread of COVID-19 throughout BOP facilities.

A.J.'s age and hypertension make him susceptible to serious complications from COVID-19. Although he may be fully vaccinated soon, sending him into a prison environment would increase the likelihood of exposure to the disease, or one of its variants. His vaccination would help protect him from infection, but it cannot ensure his safety.

In addition, A.J.'s other medical condition is such that he will require careful monitoring by his family and doctors. In a prison setting, he could deteriorate and become a danger to himself. Allowing him to remain in the community to receive the necessary treatment while on probation would be the best way to address this particular goal of sentencing.

Conclusion

For all the foregoing reasons, and for any other reasons that this Court deems fair and just, we respectfully submit that non-Guidelines sentence substantially below the advisory range, with a period of home confinement in lieu of complete incarceration, and a joint and several restitution order of \$299,409, is a just sentence that is sufficient but not greater than necessary to achieve the goals of sentencing in this case.

Respectfully submitted,

/s/ Robert M. Frost, Jr.

Robert M. Frost, Jr. (ct 19771)

FROST BUSSERT, LLC
350 Orange Street, Suite 100
New Haven, CT 06511
Tel: (203) 495-9790
Fax: (203) 495-9795
Email: rmf@frostbussert.com

ATTORNEY FOR DEFENDANT

CERTIFICATION

I hereby certify that on this date a copy of the foregoing pleading was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system and by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF system.

Dated at Guilford, Connecticut on this 29th day of March 2021.

/s/ Robert M. Frost, Jr.

Robert M. Frost, Jr.

Exhibit A

(Character Letters)

February 1, 2021

Honorable Judge Dooley
United States District Court for the District of Connecticut

Re: Armando J. Perez and my personal testament as to his character.

Dear Judge Dooley:

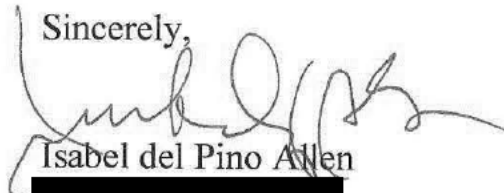
I hereby respectfully address you to relate my close acquaintance with Armando J. Perez and to respectfully assert that a virtuously-lived life should be taken into account when judging a person's alleged mistake.

Armando Perez, whom I have known since birth, comes from a humble family that emigrated from Cuba and arrived in the U.S. in the mid 1960s. His father, my great-uncle, welcomed adversity by working long hours in harsh conditions to make sure his three sons had a better life than his. While Armando's brothers pursued a tertiary education to fulfill their parents' dream, Armando (the oldest) joined the Bridgeport Police Department to help his father provide for his two brothers. All the members of the next generation, including Armando's daughters and nieces, have either graduated from college or are currently attending college.

While my closest interactions with Armando occurred when we were children, Armando never allowed physical distance or time to lessen the strength of our relationship. I never ceased to be proud of his growth and development as a human being and his boundless love for family. His absolute and publicly proclaimed acceptance and love for his transsexual daughter evidences the strength and kindness of his character.

I have made many mistakes throughout my life, as I am certain others have, but a person's character and value ought to be measured in the aggregate and not by one single alleged transgression; I hope you agree.

Sincerely,



Isabel del Pino Allen



Honorable Kari A. Dooley
United States District Judge
United States Courthouse
915 Lafayette Boulevard – Suite 266
Bridgeport, Connecticut 06604

Dear Judge Dooley,

I am writing this letter on behalf of Armando J. Perez in hopes that it will help you to see what kind of person he is and to express my support.

My name is Johanna D. Angelo, and I have known Armando J. Perez for the past 19 years while working with him at the Bridgeport Police Department. For many years, he was my direct supervisor as I worked under him in sick and injured management, and as the commanding officer in charge of the recruitment division.

Throughout this continuous subordinate-supervisor relationship, I have not only developed a great respect for AJ Perez as he climbed through the ranks within the police department, but also as a human being. I truly consider AJ a close friend. In our many conversations, I have confided in him about personal matters and his responses were always with words of encouragement. While attending graduate school, AJ Perez was there not only to support but to impart in me teachable moments in how education will provide many open doors of career opportunities.


Nevertheless, there were several tragic events that occurred where I had experienced a major loss in my life. While on duty, I discovered both a fellow officer and my brother who had committed suicide by a self-inflicted injury. During this time, AJ Perez provided me with the necessary support and time to recover as I was dealing with my personal loss and grief.

Since I have known AJ, he has always been a kind and compassionate person who strives to contribute to our community. I have witnessed firsthand how he would often take the time out of his busy schedule to frequently volunteer, while offering support, guidance, and his direct contact information to those who needed assistance.

It is my sincere hope that the court takes this letter into consideration as you deliberate on the appropriate sentence. I stand ready to offer further support to Armando J. Perez as he is a loving son, husband, father, and valuable member of the community.

Respectfully Submitted,
Johanna D. Angelo, MSCJ

Michelle R. Armstrong



February 4, 2021

Hon. Kari A. Dooley
United States District Judge
United States Courthouse
915 Lafayette Boulevard - Suite 266
Bridgeport, CT 06604

Dear Judge Dooley,

I am writing this character letter on behalf of Armando Perez. I met Armando through his wife, Isabel. I first met Isabel, and subsequently Armando, in 1998 when Isabel and I were both working at Bridgeport Hospital. Through the years, Isabel and I have continued, and continue to this day, to work together. I have become very close with Isabel, Armando and their 2 children, Soledad and Gabriella. We enjoy a personal relationship outside of work. Isabel, Armando, myself, and my partner, have shared dinners and celebrations together. Soledad has given my two granddaughters swimming lessons.

I know Armando to be a gentle, soft spoken man who has always shown a deep love for his family, his faith and his country. He is a very caring man, who truly, and passionately, embraced his law enforcement calling. Armando would always speak so empathetically and show great compassion toward those whom he encountered while discharging his professional duties. My conversations with him revealed his love for the people of Bridgeport and his sincere desire to provide a safe environment for everyone. I feel Armando always considers and puts other people's needs and desires before his own.

I believe the true character of a man is reflected in his family. Armando and Isabel have a deeply loving marriage, they trust and respect each other. Their children are respectful, caring young adults who have greatly benefited from their parents' example, love and compassion. The Perez family is a very strong and close unit.

I would like to thank you, your Honor, for allowing me this opportunity to give you my personal and respectful account of Armando's character.

Sincerely,

Michelle R. Armstrong

JOHN BRANNELLY JR.



February 7, 2021

The Honorable Kari A. Dooley
United States District Judge
United States Courthouse
915 Lafayette Boulevard - Suite 266
Bridgeport, Connecticut 06604

Re: Armando J. Perez

Dear Judge Dooley:

I humbly write to you about Armando J. (AJ) Perez. I understand Mr. Perez faces serious charges and I render I am in no position to address them. However, I would like to tell you about the AJ Perez that I have come to know since returning to the Bridgeport area in 2015.

My relationship with A.J. began in 2016 while I was working for the American Cancer Society and the City of Bridgeport helped launch a Making Strides Against Breast Cancer Walk in Seaside Park. This was a monumental undertaking. Large national organizations don't come to Bridgeport. Usually, a walk like this only takes place in places like Westport, Boston and San Diego.

Without the full support of the Police Department, it would not have been possible. AJ ensured that the Bridgeport Police Department was behind it 100%. It was a huge success and hundreds and hundreds of people, from all socio-economic backgrounds came to learn about breast cancer prevention. AJ was there in a pink shirt, with his wife Isabel, leading the way on a cold October morning. The event continued in 2017 with thousands of people coming to Bridgeport. Yes, Bridgeport. Everyone was safe and sound because AJ made sure of it.

When I worked for St. Vincent's Medical Center SWIM Across the Sound, AJ was behind our cancer prevention programs 100%. He attended events large and small, luncheons, dinners, here and across the state to support families facing cancer diagnoses. When the Bridgeport Police Department raised funds for our cancer programs, AJ would join them and even come to present the funds raised to our staff. All done without fanfare.

When planning our Greater Bridgeport St. Patrick's Day Celebration, including our annual parade in Downtown Bridgeport, AJ made sure his team planned the event properly so everyone felt welcome in Downtown Bridgeport. When Governor Ned Lamont's security detail called me the day of the parade to coordinate his surprise arrival, I knew there would be no problems because AJ would be there to make sure everything went smoothly. AJ didn't just show up on St. Patrick's Day, he would attend many of the fundraising events wrapped around the parade to demonstrate his personal commitment to the Irish community.

When it came to our Gay Pride Flag Raising at Bridgeport City Hall in 2019, Chief Perez was there. Not many police chiefs attend gay pride events. AJ Perez did. He returned in 2020 and raised the LGBT flag over city hall with his daughter Soledad who had transitioned from being his son. It was on the front page of the Connecticut Post. Police Chief raises the gay flag with his transgender daughter. Who does that? How many fathers in the United States does that? How many fathers in Hispanic families do that? How many fathers who are in law enforcement do that? How many do it publicly? Few if any. But AJ Perez did.

American Academy of Pediatrics reveled alarming levels of attempted suicide among transgender youth with the highest rates among transgender boys with more than 50% attempting suicide according to a recent study. Another study at the UCLA Williams Institute showed that trans individuals who experienced family rejection were also more likely to report attempting suicide.

First Lady Jacqueline Kennedy famously said that "If you bungle raising your children, I don't think whatever else you do matters very much" ... AJ Perez has not bungled that, his most important role as father.

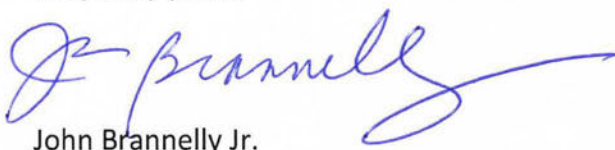
My career is now focused on ovarian cancer. Isabel Perez was the first person who volunteered to help. She even enlisted her girlfriend. When her girlfriend canceled, I thought the very shy Isabel would cancel too. Instead, AJ offered to bring her to the meeting. He accompanied her to the room and stayed with her, despite being the only other man there. This is the kind of husband AJ Perez is. Kind. Always willing to help.

AJ Perez worked to united the Bridgeport community and help heal it through work in breast cancer, local hospitals, Irish cultural events, LGBT Pride and most recently ovarian cancer. This is just the tip of the iceberg. AJ Perez has been involved in many other cultural programs that I am involved with like the Barnum Festival, City Lights Gallery and the Bridgeport Art Trail.

Now, I am just one person. There are dozens, if not hundreds, of other people like me who could write a letter like this, listing many other organizations representing public health, education, arts, cultural, sports, business, science, government and labor because AJ Perez wove himself into the fabric of our community.

Your Honor, Judge Dooley, when you have to make difficult decisions in the days ahead about Mr. Perez, I hope you will consider some of the sentiments I shared with you about the AJ Perez I know. Thank you.

Very truly yours,



John Brannelly Jr.

Lucas I. Cuadrado

Hon. Kari A. Dooley
United States District Judge
United States Courthouse
915 Lafayette Boulevard - Suite 266
Bridgeport, Connecticut 06604

February 2, 2021

Dear Judge Dooley

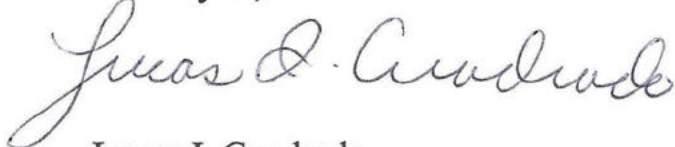
I am writing to you in regards of my cousin Armando J. Perez whom I've known for the last 33 years since I married his cousin Lourdes and joined this very large, very close-knit family.

I have always been pro police/law, this is how I was brought up and have passed it on to my four children. I have seen Armando around family, friends and sometimes with officers he worked with and seen how much he is admired, loved and respected. He has always worked very hard to protect his community, family and friends. Always very dedicated to his work in law enforcement, working countless hours his entire career.

Armando is the go-to person when you need advice or someone who would listen and comfort you.

I ask that you consider this letter in your judgement of Armando, (A.J. Perez)

Thank you,

A handwritten signature in cursive script that reads "Lucas I. Cuadrado". The signature is written in dark ink and is positioned above the printed name.

Lucas I. Cuadrado

Hon. Kari A. Dooley
United States District Judge
United States Courthouse
915 Lafayette Boulevard – Suite 266
Bridgeport, CT. 06604

Dear Judge Dooley,

February 1, 2021

My name is Letha Dardani. I have worked for the City of Bridgeport for 15 years starting in August of 2004. In March of 2009 I worked for the Bridgeport Police Department as an Administrative Assistant for the Chief of Police until my retirement in November 2019. In March 2016, AJ Perez was made Acting Police Chief and in my last 4 years until retirement, I worked for him directly.

During the first 6 years I worked as the Admin for the Police Chief, AJ Perez was the Department Clerk as the Lieutenant in charge, then moved to Narcotics and Vice, then promoted, and was made Captain in charge of the Detective Bureau. During those first 6 years I would have quite a bit of contact with AJ Perez.

I found Mr. Perez to be dedicated to each job and task he was given. He had a certain compassion for the residents of Bridgeport and always went above and beyond to help people. I was impressed by his kindness, compassion and dedication.

He certainly brought those traits with him once he was made Acting Chief, then as Chief. Having had many years as a street cop, I believe, gave him the tools and dedication to work hard and stand up for the residents of Bridgeport and his department as their Chief.

He had an open door policy and always made the time for his officers AND the public as well.

In my observation, I saw a person who took the time to hear what people had to say and listened to both sides when dealing with disciplining officers or meetings with his immediate staff. He always gave people the benefit of the doubt.

Mr. Perez was also relatable to a good portion of the residents of Bridgeport who are immigrants and came there to make a better life as he himself was an immigrant who worked hard to make a better life as well. He was always out talking to the residents and taking the time to listen to their issues and concerns and doing what he could to help them. He never took advantage of his position. He was always the ultimate peace maker. He was their friend.

As stressful as my job could be, AJ Perez made it a pleasure to come to work every day.

Sincerely,

A handwritten signature in black ink that reads "Letha Dardani". The signature is written in a cursive, flowing style.

Letha Dardani

Hon. Kari A. Dooley
United States District Judge
United States Courthouse
915 Lafayette Boulevard - Suite 266
Bridgeport, Connecticut 06604

2/8/2021

Re: Armando J. Perez

Dear Judge Dooley,

My name is Frederick Garrity Jr, and I am writing to lend reference to the man, AJ Perez, who I have come to know closer, these last 6 years.

I have known AJ Perez in his capacity as a Police Officer for the better part of a decade, through my own charity, municipal and community work. Our paths have crossed many times, and we have interacted and supported each other's causes and needs, even more since his rise to Chief.

There is no misconception on my part, in that individuals, including AJ Perez, need to be, and should be, held accountable for their actions, especially in a public position of leadership.

I *can* tell you that in my dealings with the public, and leaders at all levels, from all departments, in many municipalities, you learn to recognize sincerity, and commitment through action.

It was clear from the time I met AJ Perez, and continued through all of our interactions, that when he made a commitment to help an individual, a charitable effort, or a community need, he kept that commitment. AJ Perez, was/is, someone to be counted on to support you, and most importantly, someone who always tried to make a difference.

As you weigh the totality of your decision, I would offer that when there is available consideration for the sentencing for the offense, the part of AJ Perez's life that I was familiar with, was a good man, who tried and succeeded, to do the right thing for others whenever he had the chance.

For reference, I am the founder and director of the CT United Ride, Connecticut's largest 9/11 tribute and fundraiser for Law Enforcement and Fire Fighters, along with being the Treasurer of The Greater Bridgeport St Patrick's Day Parade Celebration, and the head Usher at St Augustine's Cathedral. I am the elected Chairman of the Trumbull Planning and Zoning Commission, and the former Chairman of the Greater Bridgeport Regional Planning Agency, as well as being a fundraiser for numerous local charity events, annually.

Thank you for your consideration.

Respectfully,



Frederick T. Garrity, Jr



Lourdes del Pino-Cuadrado

Hon. Kari A. Dooley
United States District Judge
United States Courthouse
915 Lafayette Boulevard - Suite 266
Bridgeport, Connecticut 06604

January 30, 2021

Dear Judge Dooley

I am writing to you in regards of my cousin Armando J. Perez whom I've been blessed to have in my life for the past sixty-five years.

Armando is a great person and excellent human being. He is always generous, kind and devoted towards others. He was always respected by his colleagues and friends who know he is a person with great sense of loyalty whom they can always count on, always putting his community, friends and family members first.

I trust in God that you can look at this letter and feel all the support that the family and friends of Armando are trying to provide you.

Thank you,

A handwritten signature in cursive script that reads "Lourdes M. del Pino-Cuadrado". The signature is written in dark ink and is positioned above the printed name.

Lourdes M. del Pino-Cuadrado



LYDIA N. MARTINEZ



BRIDGEPORT, CONNECTICUT 06604

February 5, 2021

Honorable Judge Kari A. Dooley
United States District court
District of Connecticut
Brien McMahon Federal Building
915 Lafayette Boulevard
Bridgeport, CT 06604

RE: Armando (AJ) Perez

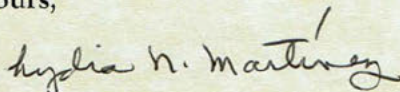
Honorable Judge Dooley,

My name is Lydia N. Martinez and I have known Armando Perez both professionally and as a friend for nearly twenty years. He has always displayed a deep empathy for the Bridgeport community. During the entire time I have known him he has shown himself to be a good father, a loving husband and dedicated community leader. When my son died, Armando Perez was there to reach out to comfort me and my family in any way he could.

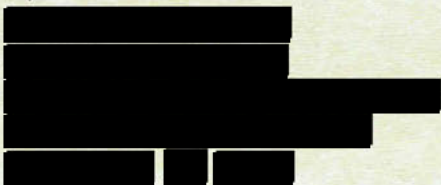
In my exchanges with Armando Perez I found him to be a man who was proud of his profession and his accomplishments in life. That he has damaged a lifetime of public service and law-abiding behavior by this single act is uncharacteristic of him. I believe him when he says he is remorseful for what he did. I would ask that you show leniency for him in your sentencing.

In my years as a State Legislator, City Council Member, and City Clerk I have always found him willing to go above and beyond to help resolve the difficult situations my constituents have found themselves in. I can say unequivocally that Armando Perez's compassion has made a significant difference in the lives of countless Bridgeport residents.

Yours,



Lydia N. Martinez



Hon. Kari A. Dooley
United States District Judge
United States Courthouse
915 Lafayette Boulevard – Suite 266
Bridgeport, Connecticut 06604

Dear Judge Dooley:

I, Gisela Mongillo have known Armando Perez all my life. He is my older cousin and have spent many times together over the last 62 years.

I am aware of the situation he is facing and am very saddened by it. He has always been a hardworking man. His character and dignity are traits that I have admired. He was always striving to better himself and provide for his family.

Armando and I spent our early childhood years in Cuba. His mom Rosa and my dad Osmin are brother and sister. Our families came to the United States in the 1960s. We would see each other on Sundays at my grandmother's house for dinner until well into our teens. School, jobs and marriage lessened the times we saw one another but saw each other at all family events. My sons always looked forward to attending gatherings and listening to Armando relate stories of how we came from a humble Cuban family with nothing more than the clothes we were wearing.

Armando has always been a very dedicated family oriented man. He devotes time to his family and is always available when you need him. He has always been a very caring and trusting human being. His thoughtfulness can be exemplified by the way he offered his home to care for his ailing mother in law in her final years instead of placing her in a nursing home. This truly reflects his character and dignity.

He continues to be a supportive husband and father. He has been active in supporting causes such as Black Lives Matter and LGBT causes in his community. He has personally experienced the challenges that can arise with individuals who represent factions of these groups. I admire and respect Armando as an individual for all he has done for his family and for his community.

Sincerely,
Gisela Mongillo

Hon. Kari A. Dooley
United States District Judge
United States Courthouse
915 Lafayette Boulevard- Suite 266
Bridgeport, Connecticut 06604

February 2nd, 2021

Dear Judge Dooley

I am writing this letter on behalf of Armando J. Perez (A J. Perez). I was blessed to acquaint ourselves with AJ when we moved into our current Trumbull neighborhood on October of 2005. Our family was immediately embraced and welcomed by AJ and his extended kindness, smile, compassion and extended hand. AJ was and is consistent with offering guidance and support at any point in time whenever it was needed. Our families bonded through the years and we are lucky enough to call AJ and his family part of our extended family.

I am somewhat knowledgeable due to media and press of the challenges AJ is being confronted with. I can clearly and with no hesitation state that AJ (Mr. Perez) always puts the best interest of others before his own. He wears his heart on his sleeve and always looks to support when and where needed. He is a people person- charismatic, giving of his time/attention, and his good deeds spread far and wide from neighborhoods, families and communities. His moral compass is driven by kindness and goodwill and due to this character trait, AJ is loved by many. AJ's career was his life and he gave wholeheartedly and beyond measures. With this, his family often felt his void at the dinner table and family functions because he once again put his career and the best interest of his community at the forefront. His devotion was seen by the impact he had on the Bridgeport community from community outreach during the season of giving to supporting schools with student presentations. What better way to leave a lasting impression on others than by extending a hand, smile and kindness in a world where it is so desperately needed. I am writing this letter in hopes of painting the image of the very inspirational soul/ character of Mr. Armando J. Perez.

Sincerely,
Olga G Monteiro

Gloria Perez
1212 83rd Street
North Bergen, NJ 07047

January 31, 2021

Hon. Kari A. Dooley
United States District Judge
United States Courthouse
915 Lafayette Boulevard - Suite 266
Bridgeport, Connecticut 06604

Dear Judge Dooley

My name is Gloria Perez and I am writing this letter in support of my cousin Armando Perez. Armando and I shared our childhood in Cuba, and both immigrated to the United States at a young age. I have maintained regular contact with Armando my entire life. I can personally attest to his good moral character and to the fact that he has been an exemplary citizen, son, father, husband, and family member throughout his entire life.

Armando came from very humble beginnings, he was not born into a privileged life. His family fled communist Cuba when he was a child. In the United States he learned to adapt to a new culture, language, and environment. He achieved the American dream with hard work and perseverance. These were the values that his mother Rosa and late father Maximo, my uncle, instilled in him.

Armando is a caring son who has always cared for his mother and late father. He has shown gratitude to them and has paid forward the love and opportunities they have provided him. He is a father who has cared for his children and upon whom has imparted his values. His children have attended university and have grown to become fine young adults who have had only positive impacts on their communities. Armando is an excellent husband to Isabel. I can personally attest to their loving relationship and the positive impact Armando has had on Isabel's life. Lastly, I can attest to the fact that Armando has been a loving cousin and a role model for all members of our family. My three sons have always looked to Armando as a role model and someone who they could aspire emulate. Armando sponsored my oldest son's Catholic confirmation, my son chose Armando because of his positive qualities. Armando is someone who you could count on, who is loyal to his family, and who is always there to help.

Judge Dooley I ask that you consider the foregoing in the sentencing of my cousin Armando Perez. Please consider the impact on our family and the fact that Armando has lived an exemplary life. His absence would have a great impact on those who know and love him

Sincerely

Gloria Perez

ISABEL PEREZ



Hon. Kari A. Dooley
United States District Judge
United States Courthouse
915 Lafayette Boulevard - Suite 266
Bridgeport, Connecticut 06604

Dear Judge Dooley,

My husband Armando Perez is emotionally devastated for the mistake he made, he is ashamed, he is enduring a feeling of guilt that does not go away, not even when he sleeps. This feeling is a punishment that will last forever. Armando is very sorry and apologize to the citizens of Bridgeport, his fellow officials and his family.

I would like to share with you, some anecdotes of my married life with Armando Perez. I want you to know what kind of loving soul my husband is.

I met him in 1995 when I arrived at this amazing country from Poland. We were married 2 years later. Before I met Armando, I lived 10 years in East Europe, had an engineer degree, and spoke couple of languages. But with Armando at my side, I learned so much about kindness and how to love other people like he does. He changed my perspective on the world with his incredible ability to care about others. The way he loves and cares for his fellow citizens melts my heart.

As a family, we enjoy going to NYC to spend the day or visit museums. Armando always will bring lots of \$1 bills and, as we stroll in the city, he will keep stopping and giving money to the homeless. Often, he would buy them food if we were eating lunch and a homeless person was outside the place. Sometimes I would try to confront him saying that those people maybe are taking his money to buy drugs, but he always convinced me that the right thing to do was to help them no matter what. In fact, when I met him, he was working as a sergeant in the City of Bridgeport. One of his worries back then was when the weather would get cold was the homeless. He would drive around to make sure people were safe, that no one was under a bridge.

He treats people with respect, care and dignity. Once, we were discussing how much police charge a person for a ticket, his answer made me looked at the situation very different. He said to me: *"that person I am giving a ticket to has a family, has bills to pay and kids to feed."* He was looking at the person not only for the infraction they made but as his fellow citizen and he care for his wellbeing and his family.

During his career, Armando participated and helped run many fundraising events. He made sure every organization that was having a parade, or a fundraiser, was getting the help they need to run it safely. He will give endless time to help any

person or organization that calls him asking for help. He will answer every call from residents that reach out to him, even if he does not know them. He always did everything he could to serve his lovely city.

I would like to share a little more about our family. After 3 years into our marriage, we took my parents in to live with us. My father had Alzheimer's Disease and my Mom could not take care of him. Armando loved and cared for my parents, the same as he does for his. My father passed after 3 years in our house with hospice care. My mother lived with us 15 more years until she passed in our house with hospice care as well. During all those years, he got up early every day to make the Cuban coffee to my Mom, he would buy her favorite ice cream, guava, and cheese. If he drove to New Jersey, he would bring her Cuban pastries from the Cuban bakeries. When she passed, we did not had money for her burial and he cashed one retirement investment, paying penalty and taxes to pay for her burial and funeral.

Armando is a great neighbor to have. During snowstorms he helps our neighbors clean the driveways, some time he would do the whole driveway for them if they were at work so when they get home they would not have to shovel.

Your honor, I am taking a little more of your time to share with you Armando's health issues that worries me immensely. Approximately year and half ago, Armando started show signs of forgetfulness, confusion that I thought were related to the stress of the job. As times goes on, his hands are shaking, and he gets lost going to places very familiar to him. This week he is to the point that he did not know how to pause a show on TV or lower the volume on the remote, these events have my heart in such a sorrow and pain. I plead to you, to please consider his health when you make your decision, prison time will accelerate the disease and destroy any opportunity to slow down the advance of the disease. Also affect me mentally so much to know I'll be next to him to care for him.

Armando has a strong faith in God and through his faith he only sees the good in all people.

Thank you for reading my letter Your Honor, I hope it give you a deeper understanding of Armando's character and his devotion to serve. Please if you could consider his 37 years of selfness serve, his current health, his regrets and suffering for his mistake when you make your decision.

Respectfully,

Isabel Perez

February 5, 2021

To Judge Dooley
Federal Court of Connecticut

About Armando J. Perez and his character as a person

Judge Dooley:

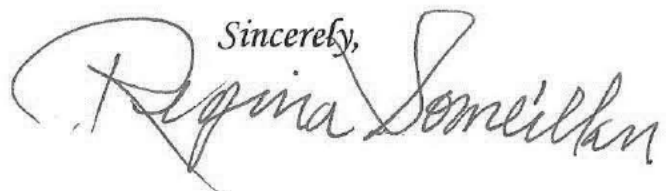
My cousin, Armando Perez, took the role that my mother had as unofficial head of the family when my mother died. My mother, the oldest of 11 children, brought all her siblings from a small town in Cuba to Havana and later was attentive to their needs. Armando did the same; he did not bring them to live in the city, but he was there always ready to help his brothers, nieces, his multiple cousins and their children, etc. In other words, Armando is the patriarch of a large family whose members stand by him and forgive him for a mistake that he, himself, regrets.

I want to make this letter short, so I cannot write all the good things Armando has done for his family, his friends, and yes.... also for his community.

I guess everybody in the United States have ancestors who came from somewhere else, therefore, an immigrant background is not uncommon. But in Armando's case things are different, he was an immigrant himself. As a little boy he applied himself, learned English, did well in school and stopped his education to help his dad and mom provide for his younger brothers. At that point Armando became the head of our extended family and the person we all looked up to.

We all still look up to Armando since we know what's in his heart.

I know, Judge Dooley, that your job is to apply justice, but I hope you are able to look in his heart and consider the type of person Armando has been throughout his life when you impose your judgment.

Sincerely,


Robin Tesei

January 28, 2021

Hon. Kari A. Dooley
United States District Judge
United States Courthouse
915 Lafayette Boulevard - Suite 266
Bridgeport, Connecticut 06604

Dear Judge Dooley:

I am writing this letter on behalf of Mr. Armando Perez. Mr. Perez has been my neighbor since 2002, the year I moved to [REDACTED] in Trumbull, CT.

During the eighteen years, I have had the pleasure of getting to know Mr. Perez because our children grew up together, which facilitated daily encounters and conversations at the bus stop, in addition to friendly socializing outside our homes.

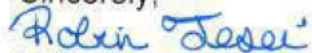
My personal experiences with Mr. Perez have led me to know that he has a huge heart, is available and desires to help others, and receives great pleasure in watching others succeed. No request to Mr. Perez is too large for him to want to help.

Throughout the years, Mr. Perez's willingness to help others in need has been displayed by his actions. I have always felt very safe on my street with Mr. Perez as a neighbor. My family had several frightening occurrences at our home, at which times I contacted Mr. Perez, he would immediately contact local authorities, and while waiting for authorities to arrive, he provided support.

Mr. Perez's compassion has been displayed during interactions with my children. My older son was painfully, socially awkward, but Mr. Perez embraced his differences. My son would show up at Mr. Perez's home, unannounced, in his bathing suit, and no matter how busy with yard work, Mr. Perez would stop working, and generously invite him to swim in his pool. Swimming was very therapeutic for my son, and Mr. Perez recognized this on his own (for I never told him). On other occasions, an adult on our street was not verbally pleasant to my son, but Mr. Perez, without being asked, stood up for him.

I am aware of the charges against Mr. Perez, from news sources. However, from my personal experiences, I know Mr. Perez to be extremely respectful, compassionate, has great integrity, a hard worker, and an overall great person. I feel fortunate to have him as a neighbor.

Sincerely,


Robin Tesei

Krystal Taylor, BSN, RN



February 8, 2021

Honorable Kari A. Dooley
United States District Judge
United States Courthouse
915 Lafayette Boulevard – Suite 266
Bridgeport, CT 06604

Re: Armando J. Perez Character Letter

Dear Honorable Judge Dooley,

My name is Krystal Taylor and I first met Mr. Armando J. Perez (AJ) through his wife, Isabel Perez. I am an Operating Room Registered Nurse/Director of Nursing and Isabel Perez and I have worked together professionally for 7 years (at 2 different outpatient surgical facilities). Our work relationship has forged into a friendship over the years and I refer to Isabel as my “Titi” (aunt), but not because of our friendship, but because of how her husband AJ has treated me and my family. Isabel became my “Titi” because of my second interaction with her husband AJ. I considered him my “Tio” (uncle) instantly, because in a time of need he instantly treated me as if I were family. Over the past 7 years, I have personally witnessed his humility, his empathy, and his continual need to help others. As a Registered Nurse, I’ve often thought that he would have been an excellent nurse because he possesses the traits that a nurse would need to provide a high standard of care, but nevertheless he has used those traits and dedicated them to a lifetime of service within the Bridgeport community, of which I am very thankful for.

First and foremost, AJ and Isabel are both very humble individuals. When I first met AJ, it was because Isabel had forgotten her lunch at home. He hand-delivered her lunch bag to her, because he wanted to make sure that she wasn’t hungry during the day. Isabel had never divulged the fact that he was Interim Chief of Police and he had never introduced himself as such. He was simply Isabel’s husband. I found out who he was (or the position that he held) when we were sitting eating lunch in the breakroom the next day and he appeared on Channel 12 News. While he was being interviewed, I noticed the picture frame on his desk that had a picture of Isabel (my coworker) and I quickly put two

and two together. I turned to Isabel and before I could get the question out, she smiled and said, "Yes, that's my husband." Most people would have led with that. They didn't. She was simply Isabel, and he was simply AJ. Two kind, hard-working, humble individuals.

I am originally from Trinidad and Tobago, was raised in Stamford, CT and moved to Bridgeport, CT after meeting my spouse and purchasing property in this city. I was so proud to own my own home but quickly became aware of the many issues that plagued the city of Bridgeport. One constant was the admiration that the community of Bridgeport held for Captain AJ Perez. At the time, AJ was Chief of Narcotics, but was considered a champion for this city. I would oftentimes see him out in the community speaking and interacting with members of the community. Everyone knew him. I was taken aback at how he constantly was a part of and a face of the Bridgeport community (out on patrol with his officers, going door to door checking on the elderly in the community, participating in Cancer walks, checking on the homeless in McLevy Green, just being there for the people who he was called to serve). Once his wife and I began working together, I began to know him in a more personal way and had many personal interactions with him.

As time progressed and I became closer to their family, I understood the impact that AJ's position had on their family. Similar to when someone serves in the armed forces and their family feels the effect of that, AJ's family served with him. There were many times that AJ had to set aside his family to serve the citizens of Bridgeport. There were holidays, birthdays, family dinners, and many cancelled family vacations, where AJ was called on by his officers and he went, to serve by their sides, not to just give commands but actively be there with them. His family understood and supported him with love. Earlier last year, AJ was placed in a unique position where most people may not have known how to navigate it, but he did it with grace and admiration. AJ and Isabel's oldest child Armand transitioned from being their son into Soledad, their daughter. While AJ and Isabel struggled privately as they were judged horrendously for supporting their child's transition, they both sought therapy on how to best support their daughter's transition. They wanted to be there for her as best as they could. Although AJ is a public figure, head of the police department, and a Hispanic man whose son [named after him], was now transitioning into a female, most people would have hid behind closed doors. Instead, AJ was standing on the steps of City Hall publicly waving a pride flag, letting the world know that he accepted his daughter and was proud of her. He exemplified what a father should be to their child.

Judge Dooley, I would like to make you aware of a private matter that the Perez family has been struggling with. In February of 2020, a month before the pandemic hit, Isabel was standing in my office and we were having a work related conversation. Her phone rang and, after about 30 seconds, she

turned pale and lost her footing. I told her to close my door and to sit down as I quickly became concerned. It was a doctor. He told Isabel that AJ had given him permission to call her and that he was very concerned about him. He told her that he had completed a neurological assessment on him and he struggled. He didn't know the date. He didn't know the year. He didn't know who the current President was. Her eyes welled up with tears. He asked Isabel if she had noticed anything recently that concerned her about AJ's wellbeing. She told him that he was having trouble sleeping. He would have night sweats. She told him that she noticed that when they were traveling in the car and had a specific destination, he would forget how to get there and she would have to redirect him. When she questioned him, he replied that it was stress from the job. The doctor advised Isabel that AJ needed neurological testing to be done. AJ had considered retiring in March of 2020, but struggled because all he had known was being a police officer and couldn't imagine a life outside of that. He would no longer be able to help the community that he had stood by for so long. Then the pandemic hit. He wanted to make sure that he was there to support his officers and colleagues during this difficult time period. He constantly reassured Isabel that he was okay and I honestly believe that he thought and wanted to believe that he was okay too. AJ has since been diagnosed with dementia and early Alzheimer's. I sincerely ask that you take this into consideration when deciding his sentence.

I am aware of the very serious criminal charges against my uncle AJ. I understand the difficult task at hand to decide what his appropriate sentence should be. I truly believe with all my heart that AJ is genuinely a good person and cares about his community. He is an excellent husband, father, and friend. He was also an excellent police officer and Chief of Police for the city of Bridgeport, CT and truly served his community. He has demonstrated integrity, selflessness, and compassion time and time again. My intent and hope is that this letter serves as a small window into the soul of a man who at this time because of a wrong decision may potentially lose everything that he has worked so hard for.

Sincerely,

A handwritten signature in blue ink that reads "Krystal Taylor". The signature is fluid and cursive, with the first name "Krystal" being more prominent than the last name "Taylor".

Krystal Taylor

Hon. Kari A. Dooley
United States District Judge
United States Courthouse
915 Lafayette Boulevard- Suite 266
Bridgeport, Connecticut 06604

Dear Judge Dooley,

When I think of Armando Perez, or AJ as I know him, I can't help but immediately reflect on his passionate nature. I've had the privilege of growing up right next door to AJ. Now as opposed to listing individual character traits, I'd like to share a story with you that I believe speaks to AJ's character as a whole. During my senior year at Trumbull High School, I was assigned a major project for my political science class in which I had to create a hypothetical law that would benefit the public and ultimately, gather statistical evidence to prove my stance. I decided to explore the multidimensionality of elderly drivers and just how much of a safety threat they presented. Now you're probably wondering how AJ ties into this story. Well, this is the part where his passion for his career shines through. As if working as the Chief of Police in the busy city of Bridgeport wasn't enough, AJ promptly assisted me with my project by becoming one of my key informants. AJ made himself available to me without hesitation. As I interviewed him about his thoughts on elderly drivers, I could both see and feel his passion. Before me was a man who loved his career- there was absolutely no question about it. But what really captivated me was how great of a leader he was. Not once did he use the word "I" when referencing the City of Bridgeport. I mean, he was the chief of police. "Chief of police" has a singular meaning and thus, he could have very well made "I" statements. However, that couldn't be further from the type of man AJ is. He used phrases like "our city" and "the team" when referencing Bridgeport. Thus, there is no denying that AJ exemplifies everything a leader should be.

The purpose of writing this letter is to allow you to see AJ through my eyes. All I can do is speak to AJ's character as I know it. I am not a member of the Bridgeport Police Department so naturally I lack that perspective. However, I don't feel as though that devalues my perspective in any way. I have known AJ for 16 years now and I can confidently attest to the fact that the man I met 16 years ago is the same man I know today. AJ Perez is a man who goes above and beyond his scope of practice to not only protect but to proudly represent a city he is truly passionate about. Passion is a quality that is lacking in today's world so I can only offer my deepest gratitude to AJ for his commitment to the people. I will always stand in support of the individual I know AJ to be.

Sincerely,

Tiffany A. Monteiro

To: Hon. Kari A . Dooley
United States District Judge
United States Courthouse
915 Lafayette Boulevard – Suite 266
Bridgeport, Connecticut 06604

Dear Judge Dooley,

I, Misael Tubens, have known Armando J Perez (AJ) for approximately seventeen (17) years. I first met him through a mutual friend and would see him intermittently at gatherings with our acquaintances. Over time, AJ and I became close personal friends. AJ became a mentor to me, helping me through multiple personnel problems. AJ, knowing my love of animals and law, arranged for me to volunteer at the Bridgeport Police Department, Department of Animal Control. When there was a vacancy for the position of Animal Control Officer in 2005, AJ guided me through the application process and encouraged me continue down that career path. Upon my being hired, AJ became my direct supervisor. Though AJ had the title of Lieutenant at the time, he never shied away from the work that came along with running a municipal shelter. AJ could be found anywhere from cleaning kennels to being in his office completing the duties that come along with being a Lieutenant. AJ took pride in the shelter and did his best to improve it every day. AJ guided me to be the fair and well-rounded street officer I was. AJ taught me how manage the diverse population of the City of Bridgeport through showing respect and kindness to everyone. Throughout my career, AJ continued to be a role model for me and my work ethic. AJ assisted me on multiple ethical and moral situations at the Department of Animal Control, always guiding me towards proper and unbiased decisions. In 2014, I sustained an on the job injury, leaving me disabled in my right arm and no longer able to preform the duties necessary to continue to be an Animal Control Officer. This diagnosis was detrimental to me, leaving me unsure how to move forward with my life and career. AJ guided me through this time both on and off the job. When the City began to speak of my retirement, he recognized my experience and connections I had made in the nine (9) years at Animal Control as invaluable. He kept me on as an office work only Animal Control Officer so that I could guide the Department until a new position opened that allowed me to continue to work for the City.

Through the many years of my personal and professional relationship with AJ, I have never seen him sway from who he is. AJ is a kind, loving, man of faith who always puts others first. AJ will not, and has not for me, hesitate to help at times of need. His moral compass leads his decisions, even if it will have a negative effect on himself. I often would argue with AJ to put himself and his family first, at which times he would say "Mikey, have compassion". If I went to him about an issue at work he would say "Have compassion, a little goes a long way". Though I did not always agree with this outlook, I would heed his advice and, in the end, be a better person for it.

In 2019, AJ's only son announced to his family that he was transgender. AJ struggled with his son's decision because he did not understand it. AJ spoke to me on multiple occasions about it, expressing how he loves his son but was struggling to accept his decision. AJ wanted to do everything in his power to support and guide his son. AJ began to look inside himself and, instead of allowing his feelings to take over, he grew into a better person and father. AJ's relationship with his son is continuing to grow because of this.

I first heard of the charges brought against AJ through the news on the day he was arrested. I was taken aback and thought the Newspaper had put the wrong name in the article. I could not reach AJ for days after, leaving me confused and upset. The person described in the paper was not the AJ I knew, not the AJ that mentored me. After a few days had passed, AJ contacted me, and his first words were "I'm sorry". AJ apologized for how his arrest may have affected me and for being apart of a situation that was unlike him. I expressed my concern for him, and he assured me to stay positive and trust in God. Even at his lowest moments, AJ put me and our friendship above himself and his feelings.

AJ's arrest is one bad snapshot of a beautiful life; of a life of over thirty (30) years of being a City of Bridgeport Police Officer, of seventeen years of being my friend. AJ is truly one of the most thoughtful, caring, loving individuals I have ever met. AJ has shown not only me, but to all those he has come across, to live life through love, compassion, and understanding.

Sincerely,



Misael Tubens

