

UNITED STATES DISTRICT COURT

for the
District of Columbia

United States of America

v.

Suzanne Ianni
aka Sue Ianni

[REDACTED]

Defendant(s)

Case: 1:21-mj-00109

Assigned to: Judge Meriweather, Robin M

Assign Date: 1/18/2021

Description: COMPLAINT W/ARREST WARRANT

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 6, 2021 in the county of _____ in the
District of Columbia, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. 1752 (a)(1) and (2)

Knowingly Entering or Remaining in any Restricted Building or Grounds
Without Lawful Authority

40 U.S.C. § 5104(e)(2)(D)

Disorderly Conduct on Capitol Grounds

This criminal complaint is based on these facts:

See attached statement of facts.

☒ Continued on the attached sheet.

Complainant's signature

Brian Gutierrez, Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
Telephone (specify reliable electronic means).Date: 01/18/2021City and state: Washington, D.C.Robin M.
Meriweather

Digitally signed by Robin M.

Meriweather

Date: 2021.01.18 16:32:03 -05'00'

Judge's signature
Robin M. Meriweather
United States Magistrate Judge
Printed name and title

STATEMENT OF FACTS

Your affiant is a Special Agent with the Federal Bureau of Investigation (“FBI”) assigned to the Boston Division, in Boston, Massachusetts. I have been employed in this capacity since October 27, 2019. I am currently assigned to the Domestic Terrorism squad of the FBI’s Boston Division. As an FBI Agent, I am responsible for the investigation of federal criminal offenses. I have participated in various investigations involving national security matters. I routinely work with agents, troopers, and officers with dozens of years of experience investigating crimes involving organized criminal groups and terrorist organizations. Before being employed as an FBI Agent, I served as a U.S. Customs and Border Protection Officer for over four years. I am assisting in the investigation and prosecution of events that occurred at the U.S. Capitol on January 6, 2021.

The U.S. Capitol, which is located at First Street, SE, in Washington, D.C., is secured 24 hours a day by U.S. Capitol Police. Restrictions around the U.S. Capitol include permanent and temporary security barriers and posts manned by U.S. Capitol Police. Only authorized people with appropriate identification are allowed access inside the U.S. Capitol.

On January 6, 2021, the exterior plaza of the U.S. Capitol was also closed to members of the public.

On January 6, 2021, a joint session of the United States Congress convened at the United States Capitol, which is located at First Street, SE, in Washington, D.C. During the joint session, elected members of the United States House of Representatives and the United States Senate were meeting in separate chambers of the United States Capitol to certify the vote count of the Electoral College of the 2020 Presidential Election, which had taken place on November 3, 2020. The joint session began at approximately 1:00 p.m. Shortly thereafter, by approximately 1:30 p.m., the House and Senate adjourned to separate chambers to resolve a particular objection. Vice President Mike Pence was present and presiding, first in the joint session, and then in the Senate chamber.

As the proceedings continued in both the House and the Senate, and with Vice President Pence present and presiding over the Senate, a large crowd gathered outside the U.S. Capitol. As noted above, temporary and permanent barricades were in place around the exterior of the U.S. Capitol building, and U.S. Capitol Police were present and attempting to keep the crowd away from the Capitol building and the proceedings underway inside.

At approximately 2:00 p.m., certain individuals in the crowd forced their way through, up, and over the barricades and officers of the U.S. Capitol Police, and the crowd advanced to the exterior façade of the building. The crowd was not lawfully authorized to enter or remain in the building and, prior to entering the building, no members of the crowd submitted to security screenings or weapons checks by U.S. Capitol Police Officers or other authorized security officials.

At such time, the certification proceedings were still underway and the exterior doors and windows of the U.S. Capitol were locked or otherwise secured. Members of the U.S. Capitol Police attempted to maintain order and keep the crowd from entering the Capitol; however, shortly after 2:00 p.m., individuals in the crowd forced entry into the U.S. Capitol, including by breaking

windows and by assaulting members of the U.S. Capitol Police, as others in the crowd encouraged and assisted those acts.

Shortly thereafter, at approximately 2:20 p.m. members of the United States House of Representatives and United States Senate, including the President of the Senate, Vice President Pence, were instructed to—and did—evacuate the chambers. Accordingly, all proceedings of the United States Congress, including the joint session, were effectively suspended until shortly after 8:00 p.m. the same day. In light of the dangerous circumstances caused by the unlawful entry to the U.S. Capitol, including the danger posed by individuals who had entered the U.S. Capitol without any security screening or weapons check, Congressional proceedings could not resume until after every unauthorized occupant had left the U.S. Capitol, and the building had been confirmed secured. The proceedings resumed at approximately 8:00 p.m. after the building had been secured. Vice President Pence remained in the U.S. Capitol from the time he was evacuated from the Senate Chamber until the session resumed.

During national news coverage of the aforementioned events, video footage, which appeared to be captured on mobile devices of persons present on the scene, depicted evidence of violations of local and federal law, including scores of individuals inside the U.S. Capitol building without authority to be there.

Open source information revealed that an individual named Suzanne “Sue” Ianni (“IANNI”) is actively involved with an organization called “Super Happy Fun America.” This organization, on its own website at superhappyfunamerica.com, purports to be an advocate for the “straight community,” bearing the motto, “It’s Great to be Straight.”

Law enforcement identified a Twitter account connected to Super Happy Fun America. A review of this account, located a post from December 29, 2020, stating that “SHFA will be in DC once again on January 6th to get wild.” The account, thereafter, posted a picture on January 5, 2021, at 8:53 p.m. of IANNI on a bus with other individuals putting their thumbs up. The caption reads, “Bus 1 of 11 coming to Washington DC. See you there!” From my review of publicly available information, I know that IANNI is the woman on the left side of the picture, wearing a blue sweater. I also know that an individual identified herein as “Known Person 1” is the man wearing a grey shirt with a black and white collar standing next to IANNI in the photograph.



Open source information further uncovered that IANNI organized the buses for Super Happy Fun America to transport individuals to Washington, D.C. for the January 6, 2021 event. Specifically, IANNI spoke to a local news station and was interviewed for a public article stating that she was the “lead organizer of the 11 buses that left Massachusetts on Tuesday for the ride to Washington.” The article continues that “[a]bout 300 members of Super Happy Fun America filled six of the buses.” Notably, in this article, IANNI declined to comment on whether she entered the U.S. Capitol.

As part of this investigation, law enforcement also located a Facebook post from account “New England for Trump” from January 4, 2021, explaining that Super Happy Fun America was sponsoring a road trip to Washington D.C. to arrive “prior to a Joint Session of Congress with state electors on January 6th.” IANNI is listed as the contact person to sign up for the bus transportation, and her phone number is provided on the post.

Following the invasion of the Capitol, private individuals and the media began posting and identifying people who were at the riot and entered the Capitol building. One such photograph shows, who I know to be, IANNI and Known Person 1 standing together in the Capitol during the invasion. The photograph appeared on a number of public forums as individuals worked successfully to identify IANNI through other pictures and information.

This identification was also reported in the MetroWest Daily News on January 11, 2021, which placed Known Person 1 and IANNI in the below photo. Based on my training and personal experience, I know this photo was taken inside the Capitol building based on the background and, specifically the decorative elements on the walls behind IANNI. Based on my review of the evidence and law enforcement data to include government photographs of IANNI, I can corroborate MetroWest’s identification, locating IANNI pictured in the Capitol building in a blue jacket with her fist raised in the photo below:




The article also identified Known Person 1 and IANNI together in a photograph outside the Capitol, further confirming that the two individuals traveled through D.C. together.



Based on the foregoing, your affiant submits that there is probable cause to believe that IANNI violated 18 U.S.C. § 1752(a)(1) and (2), which makes it a crime to (1) knowingly enter or remain in any restricted building or grounds without lawful authority to do; and (2) knowingly, and with intent to impede or disrupt the orderly conduct of Government business or official functions, engage in disorderly or disruptive conduct in, or within such proximity to, any restricted building or grounds when, or so that, such conduct, in fact, impedes or disrupts the orderly conduct of Government business or official functions; or attempts or conspires to do so. For purposes of Section 1752 of Title 18, a “restricted building” includes a posted, cordoned off, or otherwise

restricted area of a building or grounds where the President or other person protected by the Secret Service, including the Vice President, is or will be temporarily visiting; or any building or grounds so restricted in conjunction with an event designated as a special event of national significance.

Your affiant submits there is also probable cause to believe that IANNI violated 40 U.S.C. § 5104(e)(2)(D), which makes it a crime to utter loud, threatening, or abusive language, or engage in disorderly or disruptive conduct, at any place in the Grounds or in any of the Capitol Buildings with the intent to impede, disrupt, or disturb the orderly conduct of a session of Congress or either House of Congress, or the orderly conduct in that building of a hearing before, or any deliberations of, a committee of Congress or either House of Congress.


BRIAN GUTIERREZ
Special Agent
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 18th day of January 2021.

Robin M.
Meriweather
Robin M. Meriweather
U.S. MAGISTRATE JUDGE

 Digitally signed by Robin M. Meriweather
Date: 2021.01.18 16:24:16 -05'00'