UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 21-cr-00451-CJN
	)	
SUZANNE IANNI,	)	
Defendant	)	

MOTION FOR COURT TO APPOINT COUNSEL

Now comes Suzanne Ianni and respectfully moves that this Honorable court appoint counsel to represent her in pursuit of her appeal.

As reasons therefore,

1) Ms. Ianni is not "financially unable to obtain counsel" under 18 U.S.C. §3006A(b);
2) In support of her claim, she has completed the CJA-23 Form, a financial affidavit used by defendants and appellants who seek counsel in United States District Courts and Circuit Courts of Appeal. (See Motion to Seal).

Respectfully submitted,
SUZANNE IANNI,
By her attorney,
Pro Hac Vice

Date: December 14, 2022

/s/ *Henry Fasoldt*
C. Henry Fasoldt, BBO# 667422
185 Devonshire Street, Ste. 302
Boston, MA 02110
henry@bostondefenselaw.com
617-338-0009 – office

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on this date, December 14, 2022

/s/ *Henry Fasoldt*
Henry Fasoldt