

**CARL J. NICHOLS, UNITED STATES DISTRICT JUDGE
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA : **Docket No.: 0090 1:21CR00451-001**
:
vs. : **Disclosure Date: October 27, 2022**
:
Ianni, Suzanne : **:**

PARTIES OBLIGATION AND RESPONSE TO PRESENTENCE REPORT

Pursuant to Fed. Rules of Crim. Proc. Rule 32(f)(1) and (2), the parties shall submit any material inaccuracies or disputes to the presentence investigation report (PSR), by **November 10, 2022**. This form and/or objections to the PSR shall be filed via CM/ECF.

Note: The probation office never includes information about 18 USC § 3553(e) or USSG § 5K1.1, pursuant to Rule 32(c)(3).

For the Government

(CHECK APPROPRIATE BOX)

- There are no material/factual inaccuracies therein.
- There are material/factual inaccuracies in the PSR.

For the Defendant

(CHECK APPROPRIATE BOX)

- There are no material/factual inaccuracies therein.
- There are material/factual inaccuracies in the PSR.

Restrictions on Use and Rediscovery of Presentence Report

The presentence investigation report and this form are not public documents.

It is the policy of the federal judiciary and the Department of Justice that further redisclosure of the presentence investigation report is prohibited without the consent of the sentencing judge.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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

DEFENDANT’S LIST OF PRESENTENCE REPORT INACCURACIES

Now comes Suzanne Ianni in response to the Presentence Investigation Report (PSR) (Doc. No. 49), filed on October 27, 2022.

Although there are no individual material errors in the report, there are several smaller inaccuracies and typos that should be addressed. See below.

List of Proposed Corrections

- 1) Paragraph 3 – Marital Status

Correction: Ms. Ianni is “separated” but not yet divorced.

- 2) Paragraph 3 – Aliases

Correction: Ms. Ianni is also known as “Sue.”

- 3) Paragraph 16 –

Correction: Ms. Ianni traveled to Washington D.C. to attend the “Save America” rally.

- 4) Paragraph 36 –

Correction/Typo: Ms. Ianni’s sister lives in Toms River, New Jersey. The text reads “Toms *Rover*.”

- 5) Paragraph 38 –

Correction: There are reasons other than politics that Ms. Ianni and her husband are separating. It is appropriate to characterize these reasons as “irreconcilable differences.”

6) Paragraph 39 –

Correction/Typo: Remove the word “together” in sentence that says “Joseph Ianni, age 30, who is employed as a restaurant server and resides *together* in Wayland, Massachusetts.”

7) Paragraph 42 –

Correction: the scar on Ms. Ianni’s leg is from surgical removal of a benign tumor in 1984.

8) Paragraph 43 –

Correction: Another prescription should be added – Ms. Ianni self-administers a 300mg Dupixent injection every 2 weeks to treat her asthma.

9) Paragraph 45 –

Correction/Typo: the word “marital” is misspelled as “martial.”

10) Paragraph 51 –

Correction: Ms. Ianni wrote an opinion column for the Metro West Daily News (Massachusetts) from 2008-2013 for which she was not paid.

11) Paragraph 59 –

Correction: Ms. Ianni never held a Real Estate Appraiser’s license, only a Real Estate Agent’s License.

12) Paragraph 60 –

Correction: Ms. Ianni is no longer a director at Super Happy Fun America. She left that position in August 2022.

13) Paragraph 65 –

Correction/Typo: The second and third line says, “Count Four Three.” The word “Four” should be deleted.

SUZANNE IANNI,
By her attorney,

Date: November 10, 2022

/s/ Henry Fasoldt
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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, November 10, 2022.

/s/ Henry Fasoldt