

UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America

v.

Loammi Yazdani-Isfehiani, (DOB: XXXXXX) (AKA: Elijah Yazdani)

Abigail Yazdani-Isfehiani, (DOB: XXXXXX) (AKA: Abby Yazdani)

Loruhamah Yazdani-Isfehiani, (DOB: XXXXXX) (AKA: Loru Yazdani)

Defendant(s)

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Case: 1:22-mj-00033

Assigned to: Judge Faruqui, Zia M.

Assign Date: 2/18/2022

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 in the District of Columbia, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 1752(a)(1) - Entering and Remaining in a Restricted Building or Grounds;

18 U.S.C. § 1752(a)(2) - Disorderly and Disruptive Conduct in a Restricted Building or Grounds;

40 U.S.C. § 5104(e)(2)(D) - Disorderly Conduct in a Capitol Building;

40 U.S.C. § 5104(e)(2)(G) - Parading, Demonstrating, or Picketing in a Capitol Building.

This criminal complaint is based on these facts:

See attached statement of facts.

Continued on the attached sheet.

Handwritten signature of Gregory Meek

Complainant's signature

Gregory Meek, 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.

Date: 02/18/2022

Judge's signature

City and state: Washington, D.C.

Zia M. Faruqui, U.S. Magistrate Judge

Printed name and title

## STATEMENT OF FACTS

Your Affiant, Gregory Meek, is a Special Agent with the Federal Bureau of Investigation (“FBI”). Currently, I am tasked with investigating criminal activity in and around the Capitol grounds on January 6, 2021. As an FBI Special Agent, I am authorized by law or by a Government agency to engage in or supervise the prevention, detention, investigation, or prosecution of violations of Federal criminal laws.

The U.S. Capitol 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 Mike 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 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 around 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 Mike Pence, were instructed to—and did—evacuate the chambers. Accordingly, the joint session of the United States Congress was effectively suspended until shortly after 8:00 p.m. Vice President Pence remained in the United States Capitol from the time he was evacuated from the Senate Chamber until the sessions 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.

***Probable Cause Specific to Loammi Yazdani-Isfehani***

Following the January 6, 2021, breach of the U.S. Capitol, the FBI Cincinnati Field Office received numerous tips concerning individuals known to have participated in the Capitol riot. On or about March 4, 2021, an individual identified as Witness-1 met with FBI to provide information that he/she knew about **Loammi YAZDANI-ISFEHANI**, a/k/a “Elijah Yazdani”, and his entry into the U.S. Capitol on January 6, 2021.

Witness-1 and **Loammi YAZDANI-ISFEHANI** have known each other for years. Upon reviewing an Ohio state DMV photograph of **Loammi YAZDANI-ISFEHANI**, Witness-1 positively identified **Loammi YAZDANI-ISFEHANI** as the person he/she knows.

Witness-1 informed FBI that **Loammi YAZDANI-ISFEHANI** and his sisters, **Abigail YAZDANI-ISFEHANI** and **Loruhamah YAZDANI-ISFEHANI**, traveled to Washington D.C. to attend a rally in Washington D.C. According to Witness-1, **Loammi YAZDANI-ISFEHANI** admitted that he entered the U.S. Capitol Building on January 6.

According to Witness-1, prior to January 6, **Loammi YAZDANI-ISFEHANI** verbalized his support of former United States President Donald Trump and his belief that former President Trump was “unfairly cheated” out of a second term as U.S. President. Sometime after January 6, **Loammi YAZDANI-ISFEHANI** sent videos from his cellular telephone, utilizing his telephone number (xxx) xxx-4255 to Witness-1. Witness-1 received the videos to his/her cellular telephone. Witness-1 is familiar with the aforementioned telephone number as being the cellular telephone number of **Loammi YAZDANI-ISFEHANI**. The videos showed **Loammi YAZDANI-ISFEHANI** inside of the U.S. Capitol. The videos depicted various statutes inside the building and individuals inside of the Capitol.

Witness-1 recalled **Loammi YAZDANI-ISFEHANI** stating that he drove from his residence located in Albany, Ohio to Washington D.C. Witness-1 knows **Loammi YAZDANI-ISFEHANI** to drive an older model Pontiac Grand Am, gray or silver in color. **Loammi YAZDANI-ISFEHANI** told Witness-1 that he was accompanied to Washington D.C. by his female siblings. Witness-1 did not know whether the YAZDANI-ISFEHANI sisters entered the U.S. Capitol on January 6.

As it relates to what occurred inside of the Capitol, **Loammi YAZDANI-ISFEHANI** told Witness-1 that he only walked around the U.S. Capitol while inside and that he believed that the violence that took place that day was caused by Antifa.

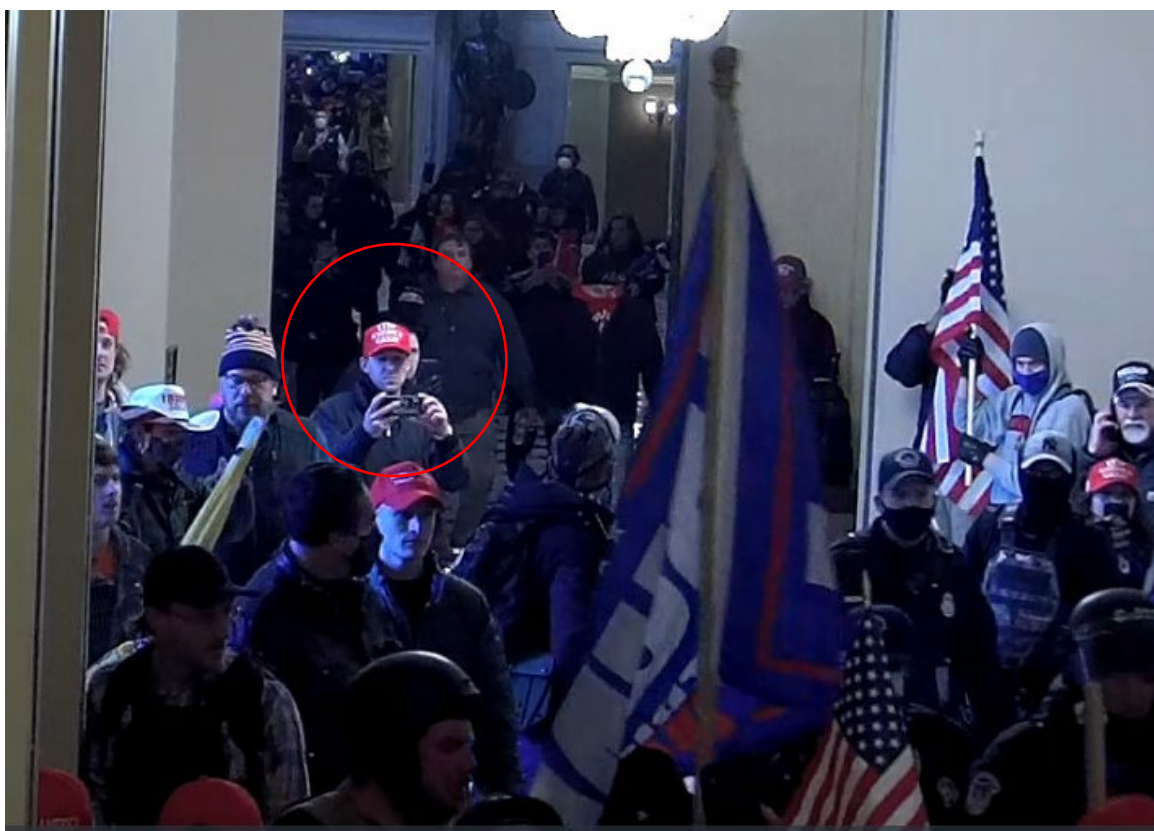
Witness-1 deleted the videos from his/her telephone that he/she received from **Loammi YAZDANI-ISFEHANI**.

In an effort to locate videos of **Loammi YAZDANI-ISFEHANI** inside the U.S. Capitol, your affiant conducted a manual review of the United States Capitol Police (USCP) closed-circuit

television (CCTV). Numerous images of **Loammi YAZDANI-ISFEHANI** inside of the U.S. Capitol were located. Your affiant compared **Loammi YAZDANI-ISFEHANI**'s driver's license photograph to the images generated. Based upon my review of the images, I determined that **Loammi YAZDANI-ISFEHANI** was likely inside of the U.S. Capitol Building on January 6.

While reviewing the video surveillance I observed the person I believe to be **Loammi YAZDANI-ISFEHANI** wearing a red "Keep America Great" hat, dark jacket, with what appears to be a dark hoodie sweatshirt underneath, drab-colored pants, and dark-colored tennis shoes. I also observed the individual believed to be **Loammi YAZDANI-ISFEHANI** in possession of a cellular telephone.

The following are still photographs taken from CCTV surveillance footage which capture the individual believed to be **Loammi YAZDANI-ISFEHANI** inside of the U.S. Capitol Building:



*Image 1*

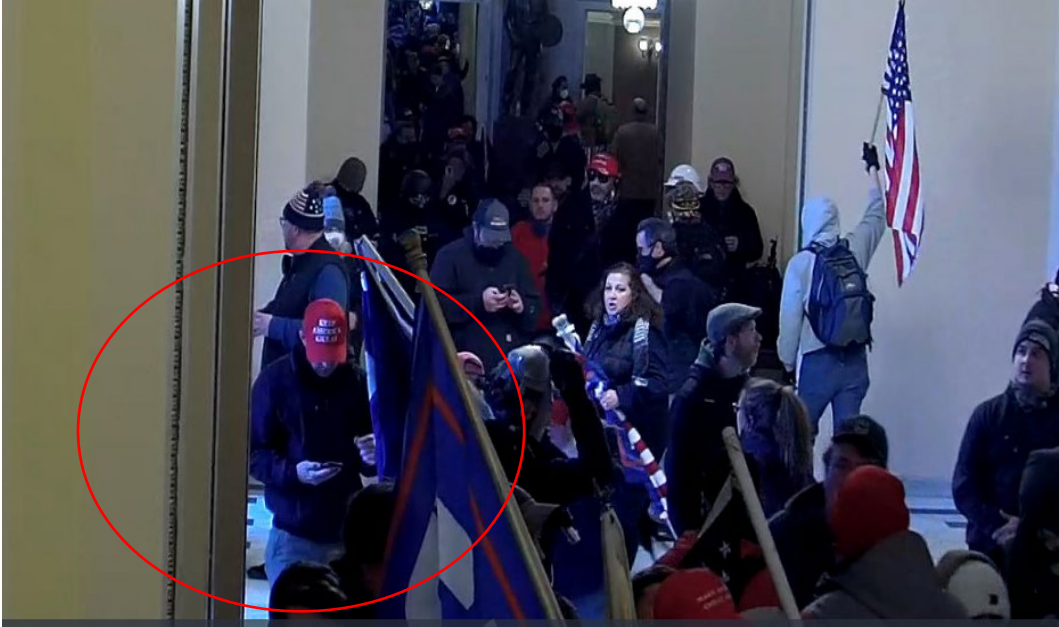


Image 2



Image 3



*Image 4*

After obtaining the surveillance video footage, I met with Witness-1. During the meeting, I showed Witness-1 additional video stills of **Loammi YAZDANI-ISFEHANI** from inside the U.S. Capitol. See *Images 5 and 6*.



*Image 5*



*Image 6*

Witness-1 positively identified the individual in *Images 5 and 6* as **Loammi YAZDANI-ISFEHANI**.

*Post-arrest Interview of Elijah Yazdani*

On April 28, 2021, the government presented a Complaint and Arrest Warrant requesting the arrest of **Loammi YAZDANI-ISFEHANI** based on the aforementioned information. (Rec. Docs. 1-4). On April 28, 2021, the Complaint and Arrest Warrant were signed by a U.S. Magistrate Judge. On May 3, 2021, **Loammi YAZDANI-ISFEHANI** was arrested pursuant to an arrest warrant. (Rec. Doc. 5).

On May 3, 2021, **Loammi YAZDANI-ISFEHANI** executed an FBI Advice of Rights form, voluntarily waiving his right to remain silent, thereby consenting to be interviewed by the FBI. During his interview, **Loammi YAZDANI-ISFEHANI** admitted to entering the U.S. Capitol on January 6. Additionally, he admitted that his sisters, **Abigail YAZDANI-ISFEHANI** and **Loruhamah YAZDANI-ISFEHANI**, entered the U.S. Capitol with him. **Loammi YAZDANI-ISFEHANI** reviewed photographs of himself inside of the U.S. Capitol and positively identified himself in each of the photographs.

*Probable Cause Specific to Loruhamah Yazdani-Isfehiani*

On May 3, 2021, **Loruhamah YAZDANI-ISFEHANI**, was present at the location of her brother's arrest. **Loruhamah YAZDANI-ISFEHANI** voluntarily agreed to speak with FBI agents after being informed that she was under no obligation to speak with the agents and being advised that she was free to leave the location. During her interview, **Loruhamah YAZDANI-ISFEHANI** told agents that she and her sister, **Abigail YAZDANI-ISFEHANI**, traveled to Washington D.C. with their brother on January 5, 2021. The siblings traveled to Washington D.C. to attend a "Stop the Steal" rally on January 6. While at the rally, **Loruhamah YAZDANI-ISFEHANI** heard rally attendees say that they were going to the U.S. Capitol after the rally to "stop the steal." **Loruhamah YAZDANI-ISFEHANI** and her siblings decided to walk to the U.S. Capitol.

Upon arriving at the U.S. Capitol, **Loruhamah YAZDANI-ISFEHANI** saw police officers standing near the entrance. She alleges that the officers allowed she and her siblings to enter the U.S. Capitol. Upon entering, **Loruhamah YAZDANI-ISFEHANI**, **Abigail YAZDANI-ISFEHANI**, and **Loammi YAZDANI-ISFEHANI** walked up a set of stairs into what stated was the Capitol Rotunda. She recalled officers telling and other rioters that they could not proceed further. **Loruhamah YAZDANI-ISFEHANI** recalled rioters attempting to push their way through the officers despite of the warnings. After hearing that officers had deployed tear gas inside of the U.S. Capitol, the YAZDANI-ISFEHANI siblings attempted to leave the building.

**Loruhamah YAZDANI-ISFEHANI** reviewed photographs of her brother, **Loammi YAZDANI-ISFEHANI** taken on January 6. When shown one image, **Loruhamah YAZDANI-ISFEHANI** stated that she could not state for certain that the individual in the photograph was **Loammi YAZDANI-ISFEHANI**. However, when shown *Images 5 and 6*, she positively

identified **Loammi YAZDANI-ISFEHANI** as the individual with whom she entered the U.S. Capitol on January 6.

Based on **Loruhamah YAZDANI-ISFEHANI**'s admission, and the information received from Witness-1 and **Loammi YAZDANI-ISFEHANI**, your affiant attempted to confirm that **Loruhamah YAZDANI-ISFEHANI** entered the U.S. Capitol on January 6. I began by locating an Ohio DMV photo of **Loruhamah YAZDANI-ISFEHANI**. I then reviewed CCTV footage to attempt to identify **Loruhamah YAZDANI-ISFEHANI**.

The following images show **Loruhamah YAZDANI-ISFEHANI** inside of Statuary Hall, the same location that her brother, **Loammi YAZDANI-ISFEHANI** was identified. *See Images 10 and 11.*



*Image 10*





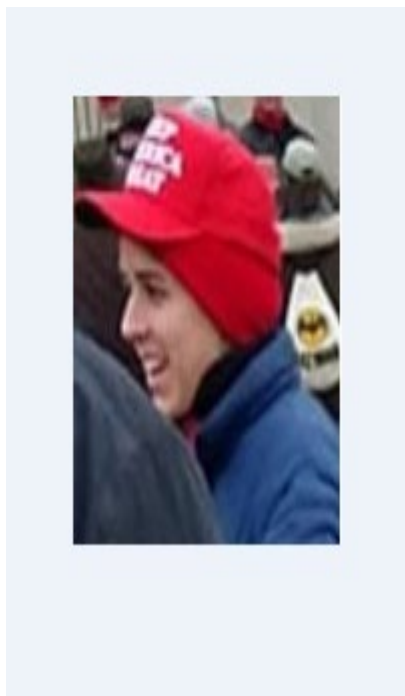
*Image 11*

As mentioned, your Affiant personally interviewed **Loruhmah YAZDANI-ISFEHANI**. Having reviewed surveillance and having personally observed **Loruhmah YAZDANI-ISFEHANI**, and having reviewed the CCTV surveillance footage, your Affiant believes that the person shown in *Images 10* and *11* is likely **Loruhmah YAZDANI-ISFEHANI**.

***Probable Cause Specific to Abigail Yazdani-Isfehani***

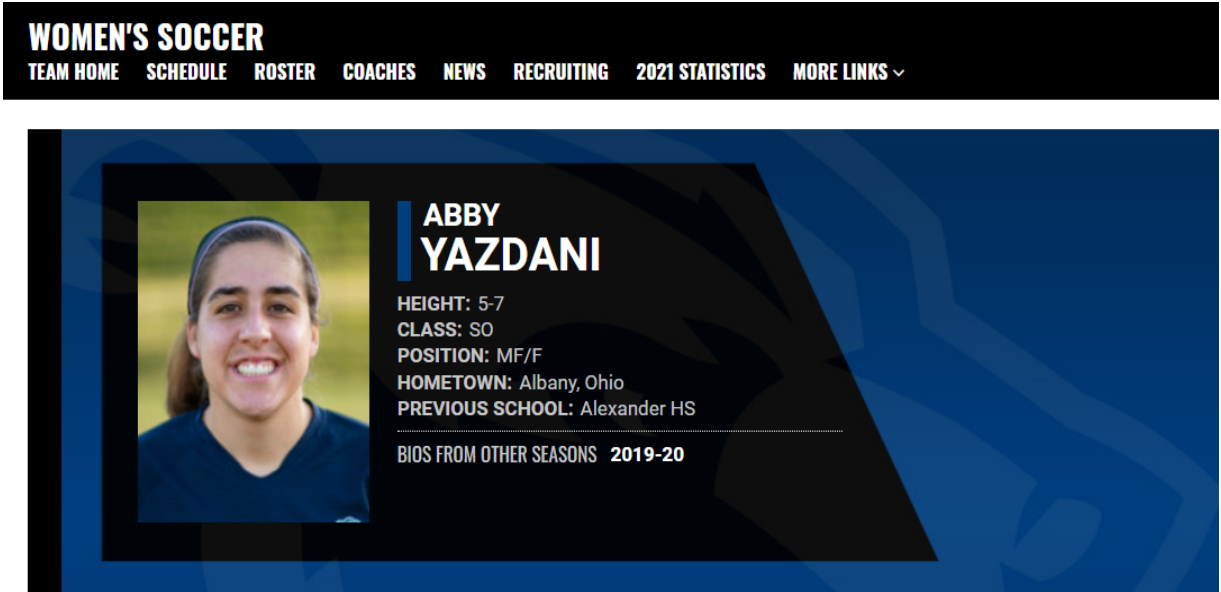
With knowledge that **Loammi YAZDANI-ISFEHANI** and **Loruhmah YAZDANI-ISFEHANI** traveled to Washington D.C. with their sibling, **Abigail YAZDANI-ISFEHANI**, your affiant attempted to locate CCTV surveillance that would place **Abigail YAZDANI-ISFEHANI** inside of the U.S. Capitol. I located an Ohio DMV photograph of **Abigail YAZDANI-ISFEHANI** prior to reviewing CCTV footage. The investigation yielded a positive response that **Abigail YAZDANI-ISFEHANI** was likely inside of the U.S. Capitol.

I located surveillance footage capturing the person I believed to be **Abigail YAZDANI-ISFEHANI** outside of the U.S. Capitol. *See Image 12.*



*Image 12*

Additionally, your affiant located open source materials that provided additional photographs of **Abigail YAZDANI-ISFEHANI**. During my investigation, I learned that **Abigail YAZDANI-ISFEHANI** is a student at Shawnee State where she is/was a member of the women's soccer team. <http://www.ssubears.com/roster/35/8/5184.php>. The website includes photographs of team members. The photograph below depicts a photograph of an individual identified as "Abby Yazdani." Accompanying the photograph is a personal biography which references that "Abby Yazdani" has five siblings including "Loru, Isaiah, and Elijah."



**High School:** Played at Albany Alexander High School in Albany, Ohio ... was named to the Second-Team Division II Girls All-Southeast District squad while with the Lady Spartans ... split time between the midfield and the offensive frontline.

**Personal:** Daughter of Beth Yazdani ... has five siblings, including her elder brother Josiah, who played football as a kicker for Ohio University; Josiah ranked second all time in field goals made in Ohio, with 47, at the time of his graduation, and was signed by the Arena Football League's Cleveland Gladiators in 2017. ... youngest brother, Shaleh, has written a book called "Courage through Faith," which was published by Christian Faith Publishing ... Loru, Isaiah, and Elijah are her additional siblings. ... loves to learn and grow further in her faith in God during her spare time.

*Image 13*

Your affiant compared *Images 12* and *13* to the Ohio DMV photograph of **Abigail YAZDANI-ISFEHANI**. I believe that the individual in these images is likely one in the same.

Additionally, I located the public Facebook page of Elizabeth Yazdani whom I believe to be the mother of the Yazdani siblings, Elizabeth Yazdani. Notably, "Abby Yazdani's" biography in *Image 13* states that she is the "daughter of Beth Yazdani." I located a photograph of what I believe to be a picture of the five Yazdani siblings, including, **Abigail YAZDANI-ISFEHANI**, **Loruhamah YAZDANI-ISFEHANI**, and **Loammi YAZDANI-ISFEHANI**.



Image 14

Upon comparing the Ohio DMV photograph of the person identified as **Abigail YAZDANI-ISFEHANI** to the person in *Image 12*, I concluded that the individual in *Image 12* is likely **Abigail YAZDANI-ISFEHANI**.

I then reviewed surveillance inside of the U.S. Capitol to attempt to locate **Abigail YAZDANI-ISFEHANI**. Numerous images of the person believed to be **Abigail YAZDANI-ISFEHANI** were located. *See Image 15*.

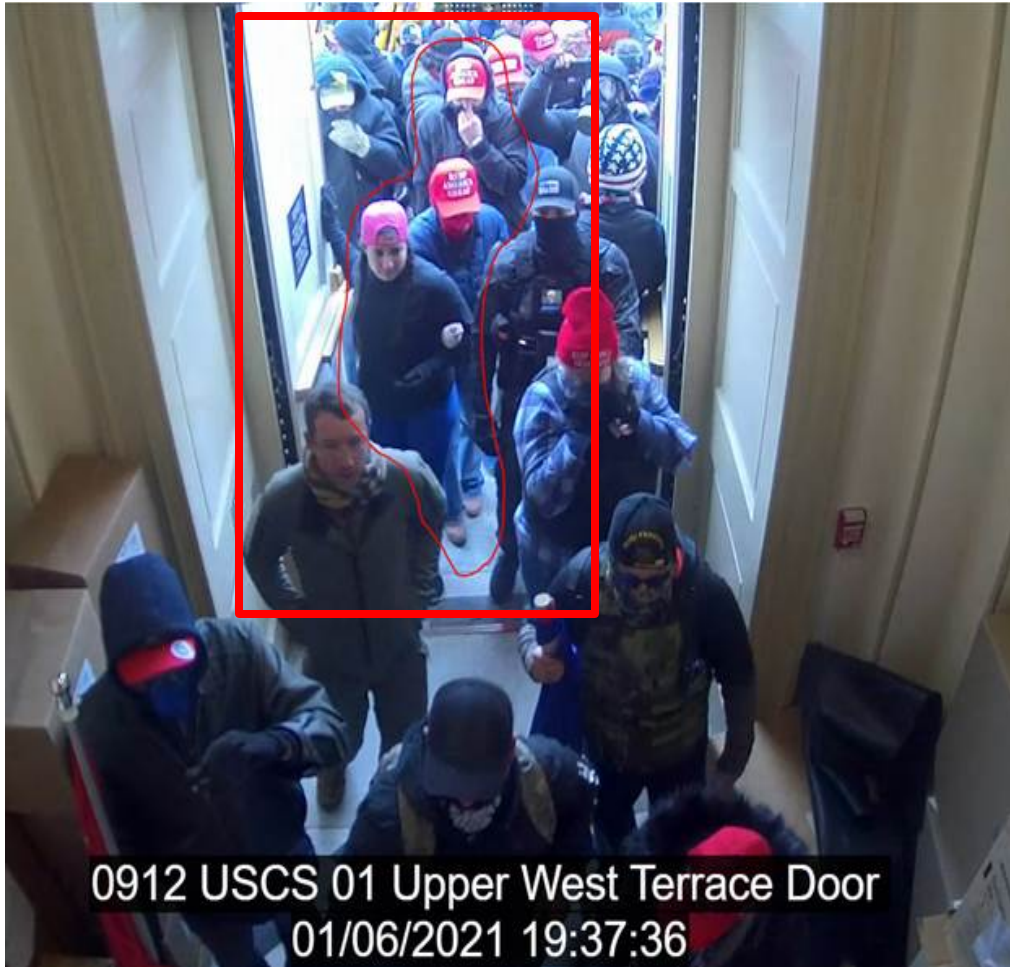


*Image 15*

I observed that the individual in *Images 12* and *15* was attired in the same red “Make America Great Again” baseball cap and what appears to be a red hat/band underneath the baseball cap. Additionally, the individual appears to be wearing a dark colored turtleneck/sweater underneath a blue puffer jacket.

Additionally, I observed a number of images of the person believed to be **Abigail YAZDANI-ISFEHANI** along with the individuals previously identified as **Loammi YAZDANI-ISFEHANI** and **Loruhmah YAZDANI-ISFEHANI** inside of the U.S. Capitol.

CCTV surveillance footage shows the YAZDANI-ISFEHANI siblings entering the U.S. Capitol from the West Front via the Upper West Terrace at approximately 2:37 p.m. It appears that the YAZDANI-ISFEHANI siblings walked up the stairs to the second floor and entered the Rotunda from the west entrance. *See Images 16* and *17*.



*Image 16*

These images of the YAZDANI-ISFEHANI siblings inside of the U.S. Capitol corroborate the information provided by Witness-1, as well as the information provided by **Loammi YAZDANI-ISFEHANI** and **Loruhamah YAZDANI-ISFEHANI**.



*Image 17*

The YAZDANI-ISFEHANI siblings are believed to have walked through the Rotunda into Statuary Hall. *See Images 17 and 18.*



*Image 18*



*Image 19*

After exiting Statuary Hall, the YAZDANI-ISFEHANI siblings appear to have walked through the Statuary Hall Connector and to the Rotunda before exiting the U.S. Capitol at approximately 3:14 p.m. *See Image 19.*





*Image 20*

The YAZDANI-ISFEHANI siblings were inside of the U.S. Capitol for approximately 37 minutes.

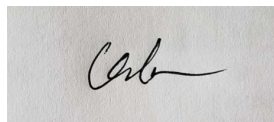
After comparing the CCTV surveillance footage and the DMV photograph of **Abigail YAZDANI-ISFEHANI**, your affiant believes that the individual in *Images 12-20* is likely **Abigail YAZDANI-ISFEHANI**. Additionally, based upon the information received in interviews of Witness-1, **Loammi YAZDANI-ISFEHANI**, and **Loruhamah YAZDANI-ISFEHANI** your Affiant believes that **Abigail YAZDANI-ISFEHANI** was inside of the U.S. Capitol on January 6.

## CONCLUSION

Based on the foregoing, your Affiant submits that there is probable cause to believe that **Loammi YAZDANI-ISFEHANI**, a/k/a “Elijah Yazdani,” **Loruhamah YAZDANI-ISFEHANI**, and **Abigail YAZDANI-ISFEHANI** 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 **Loammi YAZDANI-ISFEHANI**, a/k/a “Elijah Yazdani,” **Loruhamah YAZDANI-ISFEHANI**, and **Abigail YAZDANI-ISFEHANI** violated 40 U.S.C. §§ 5104(e), which make it a crime to willfully and knowingly (D) 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; and (G) parade, demonstrate, or picket in any of the Capitol Buildings.



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Agent Gregory Meek, 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 February, 2022.

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U.S. MAGISTRATE JUDGE