

No. _____

**In The
Supreme Court of the United States**

—◆—

USHA SOUJANYA KARRI,

Petitioner,

v.

MERRICK B. GARLAND, et al.,

Respondents.

—◆—

**On Petition For Writ Of Certiorari
To The United States Court Of Appeals
For The Seventh Circuit**

—◆—

PETITION FOR WRIT OF CERTIORARI

—◆—

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Petitioner

QUESTIONS PRESENTED

1. Is it lawful when the Trial Court cites ‘abstention grounds’ and refuses to order for investigation as per the ‘Rule of Law’, as Chicago Police were bribed to cover up several felony criminal cases and, state-court judges and lawyers were bribed to conspire with the offender for further coverup of the crime by trying to get the victim murdered by violating the civil rights under color of law, and the bribery involved millions of dollars using illegal money from India?

2. Is it lawful for the Trial Court to dismiss the Complaint with sufficient facts for a series of frauds, bribery, murder conspiracies, and murder-for-hire crimes against the crime victim, by citing ‘violation of F.R.C.P. Rule 8(a)(2) requiring only a short statement’, in conflict with the US Supreme Court’s decisions in *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 570 (2007) and *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009), and with 10 other Circuit Courts’ decisions and, also with the 7th Circuit Court’s own prior decision in *Cooney v. Rossiter*, 583 F.3d 967, 971 (7th Cir. 2009)?

3. As per the ‘Rule of Law’, can the Court order the Chicago Police Chief to investigate the several felony criminal cases covered up by Chicago Police resulting in further crime against the victim by violations of civil rights under color of law, and order the US Attorney General to investigate the bribery and violations of civil rights under color of law through murder conspiracies and murder-for-hire crimes against the crime victim, as covered up by federal prosecutors from US Attorney’s Office in Chicago?

PARTIES TO THE PROCEEDING

Petitioner **USHA SOUJANYA KARRI** as ‘pro se’ was the plaintiff in the district court proceedings and the appellant in the court of appeals proceedings as she was a victim of serious Domestic Violence and Theft for which several felony criminal cases have been pending with Chicago Police since May 2018. She is also the Respondent in the divorce case filed by her husband, Respondent **VENKATESH BHOGIREDDY** in the Cook County Circuit Court. She is also one (identified as ‘Individual A’) of the 2 victims in the ‘Murder-for-Hire’ federal criminal case against Respondent **VENKATESH BHOGIREDDY** (*USA v. BHOGIREDDY*, Case No. 1:19-cr-00769).

Respondents as listed below are the defendants in the district court proceedings and the appellees in the court of appeals proceedings.

MERRICK B. GARLAND, Attorney General of the United States and head of the United States Department of Justice (“DOJ”) in Washington D.C.,

DAVID O. BROWN, Superintendent of Chicago Police Department (he resigned from the position in March 2023),

DEBRA B. WALKER, Circuit Judge in the Domestic Relations Division of Cook County Circuit Court in Chicago, and is currently a Judge in District 1 of Illinois Court of Appeals,

WILLIAM YU, Associate Judge in the Domestic Relations Division of Cook County Circuit Court in Chicago,

PARTIES TO THE PROCEEDING – Continued

DAVID E. HARACZ, Associate Judge in the Domestic Relations Division of Cook County Circuit Court in Chicago,

LYNN WYPYCH, Attorney and Guardian ad Litem appointed by the Domestic Relations Division of Cook County Circuit Court in Chicago,

JANET E. BOYLE, Petitioner **USHA SOUJANYA KARRI**'s former attorney in the Domestic Relations Division of Cook County Circuit Court in Chicago,

ARIN R. FIFE, Petitioner **USHA SOUJANYA KARRI**'s former attorney along with attorney **JANET E. BOYLE** above, in the Domestic Relations Division of Cook County Circuit Court in Chicago,

STEPHANIE BONZA, Psychologist appointed by the Domestic Relations Division of Cook County Circuit Court in Chicago, to conduct an assessment for Respondent **VENKATESH BHOGIREDDY** while he is incarcerated in Federal Prison,

JAMI M. BUZINSKI, Attorney of Respondent **VENKATESH BHOGIREDDY**, in the Domestic Relations Division of Cook County Circuit Court in Chicago,

and

VENKATESH BHOGIREDDY, Petitioner **USHA SOUJANYA KARRI**'s husband and he is the Petitioner of the divorce case he filed (Case No. 2018D006785 – *BHOGIREDDY v. KARRI*) in the Domestic Relations Division of Cook County Circuit Court in Chicago. He

PARTIES TO THE PROCEEDING – Continued

is also the Defendant in the ‘Murder-for-Hire’ federal criminal case ‘*USA v. BHOGIREDDY* with Case No. 1:19-cr-00769’, and he was convicted in the case and is currently incarcerated in Federal Prison in Chicago.

RELATED CASES

- *Karri v. Garland, et al.*, No. 1:22-cv-00055, U.S. District Court for the Northern District of Illinois, Chicago. Judgment was entered on May 3, 2022.
- *Karri v. Garland, et al.*, No. 1:22-cv-00055, U.S. District Court for the Northern District of Illinois, Chicago. Motion to Reconsider (Alter or Amend a Judgment) was denied on June 6, 2022.
- *Karri v. Garland, et al.*, No. 22-2363, U.S. Court of Appeals for the Seventh Circuit, Chicago. Judgment was entered on May 11, 2023.
- *Karri v. Garland, et al.*, No. 1:22-cv-00055, No. 22-2363, U.S. Court of Appeals for the Seventh Circuit, Chicago. Petition for ‘Rehearing En Banc’ was denied on July 21, 2023.
- *USA v. Bhogireddy*, No. 1:19-cr-00769 (for ‘Murder-for-Hire’ crime), U.S. District Court for the Northern District of Illinois, Chicago. Defendant **VENKATESH BHOGIREDDY** was convicted by a federal Jury on May 27, 2021. Sentencing is still pending.

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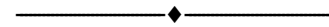
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PETITION FOR A WRIT OF CERTIORARI

Usha Soujanya Karri as ‘pro se’ petitions for a writ of certiorari to review the judgment of the United States Court of Appeals for the Seventh Circuit in this case.



OPINIONS BELOW

The Seventh Circuit’s unpublished opinion is reproduced at App. 1a-7a. The Seventh Circuit’s denial of petitioner’s petition for rehearing en banc is reproduced at App. 8a. The opinions of the U.S. District Court for the Northern District of Illinois are reproduced at App. 9a-17a and App. 18a-19a.



JURISDICTION

The Court of Appeals entered judgment on May 11, 2023. App. 1a-7a. The court denied a timely petition for rehearing en banc on July 21, 2023. App. 8a. This Court has jurisdiction under 28 U.S.C. § 1254(1).



STATUTES AND CONSTITUTIONAL PROVISIONS INVOLVED

42 U.S.C. § 1983 provides:

Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia,

subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress, except that in any action brought against a judicial officer for an act or omission taken in such officer's judicial capacity, injunctive relief shall not be granted unless a declaratory decree was violated or declaratory relief was unavailable. For the purposes of this section, any Act of Congress applicable exclusively to the District of Columbia shall be considered to be a statute of the District of Columbia.

28 U.S.C. § 2201 provides:

(a) In a case of actual controversy within its jurisdiction, except with respect to Federal taxes other than actions brought under section 7428 of the Internal Revenue Code of 1986, a proceeding under section 505 or 1146 of title 11, or in any civil action involving an antidumping or countervailing duty proceeding regarding a class or kind of merchandise of a free trade area country (as defined in section 516A(f)(9) of the Tariff Act of 1930), as determined by the administering authority, any court of the United States, upon the filing of an appropriate pleading, may declare the rights and other legal relations of any interested party seeking such declaration, whether or not further relief is or could be sought. Any such declaration shall have the force and

effect of a final judgment or decree and shall be reviewable as such.

28 U.S.C. § 2202 provides:

Further necessary or proper relief based on a declaratory judgment or decree may be granted, after reasonable notice and hearing, against any adverse party whose rights have been determined by such judgment.

5 U.S.C. § 702 provides:

A person suffering legal wrong because of agency action, or adversely affected or aggrieved by agency action within the meaning of a relevant statute, is entitled to judicial review thereof. An action in a court of the United States seeking relief other than money damages and stating a claim that an agency or an officer or employee thereof acted or failed to act in an official capacity or under color of legal authority shall not be dismissed nor relief therein be denied on the ground that it is against the United States or that the United States is an indispensable party. The United States may be named as a defendant in any such action, and a judgment or decree may be entered against the United States: Provided, That any mandatory or injunctive decree shall specify the Federal officer or officers (by name or by title), and their successors in office, personally responsible for compliance. Nothing herein (1) affects other limitations on judicial review or the power or duty of the court to dismiss any action or deny relief on any other appropriate legal or

equitable ground; or (2) confers authority to grant relief if any other statute that grants consent to suit expressly or impliedly forbids the relief which is sought.



INTRODUCTION

I, the Petitioner USHA SOUJANYA KARRI as pro se, filed this case in the federal district court on January 5, 2022 for violation of my rights as protected by Fourteenth Amendment of the US Constitution, under color of law without due process of law, as there was a second attempt by Respondents (referred as ‘Defendants’ from here onwards) to get me murdered to obstruct me from presenting my ‘Victim Impact Statement’ during the ‘Sentencing Hearing’ in the ‘Murder-for-Hire’ federal criminal case, *USA v. BHOGIREDDY*, Case No. 1:19-cr-00769.

The obstruction was to cover up a series of felony crimes for Battery, Criminal Sexual Assault, Theft of my property like gold jewelry, Murder-for-Hire, Murder Conspiracies and Public Corruption through Bribery in Millions of dollars using illegal money from India. As part of the lawsuit, I requested the Court for Declaratory Injunctive relief as per 28 U.S.C. §§ 2201 and 2202, and 5 U.S.C. § 702 by ordering investigation of the serious crimes and for damages from 5 of the 11 Defendants as per 42 U.S.C. § 1983.

This case presents issues, which are exceptionally important and of public interest as both the District

Court and the 7th Circuit Court dismissed the case unlawfully by citing 'Abstention from State-court case' and 'Violation of F.R.C.P. Rule 8(a)(2)' without addressing the above serious crimes by Defendants who are powerful public officials like Chicago Police, State-court Judges and lawyers, supported by federal prosecutors. The dismissal effectively provides cover for the Defendants' serious crimes in the name of the above 2 unlawful grounds, especially at the time when people are very worried about the ever-growing crime in Chicago.

This case also presents how my husband, Defendant BHOGIREDDY's criminal family from India is able to commit serious crimes and corruption in the US at the same level as they do in India without any accountability, as they are bribing Judiciary and Law Enforcement Officers.

Prior to filing the above lawsuit, my husband Defendant BHOGIREDDY along with his family (father Prudhvi Narayana Bhogireddy, mother Leela Bhogireddy and sister Varija Bhogireddy) scammed me in the name of marriage and he inflicted severe domestic violence against me. Due to death threats by him, when I reported the violence to the Chicago Police on May 3, 2018 and July 6, 2018, the Police filed cases for Battery, Criminal Sexual Assault and Theft of my personal property like gold jewelry worth \$81,570 (current value: \$110,000) by violating an Order of Protection in effect against BHOGIREDDY.

Using millions of dollars of illegal money from India, to cover up his serious crimes, BHOGIREDDY bribed Chicago Police, and Judges and Lawyers (including my lawyers) from Cook County Circuit Court as he filed for Divorce on August 8, 2018. Chicago Police including the Chief, Defendant BROWN covered up the above felony criminal cases, despite my several follow-ups and complaints against them.

As I complained against Chicago Police for their coverup, BHOGIREDDY hired 2 teams of hitmen (undercover federal agents from ATF) to get me and my uncle from New Jersey, a key witness to the crimes, murdered. With his murder plans, the state-court Judge Defendant WALKER along with Defendants BUZINSKI and WYPYCH and my then attorneys Defendants BOYLE and FIFE helped Defendant BHOGIREDDY as part of the conspiracy to get me murdered, by creating fraudulent and unlawful court orders for him on July 25, 2019 and September 3, 2019. On October 2, 2019, federal agents from ATF arrested BHOGIREDDY and filed a 'Murder-for-Hire' federal criminal case on October 3, 2019.

However, federal prosecutors from the US Attorney's Office (US Department of Justice, DOJ) in Chicago led by US Attorney John R. Lausch and Assistant US Attorney Jason A. Julien covered up all the underlying criminal cases against BHOGIREDDY pending with Chicago Police and his plans to get me murdered, during the trial in May 2021. Despite the several efforts by federal prosecutors to acquit BHOGIREDDY, on May 27, 2021 during the trial, a federal Jury found

BHOGIREDDY guilty of the crime to get my uncle murdered and hence, he has been incarcerated in federal prison in Chicago since then.

In order to release BHOGIREDDY from prison with a favorable sentence, state-court Judges Defendants YU and HARACZ along with Defendants BUZINSKI, WYPYCH and BONZA conspired with BHOGIREDDY (while he is in federal prison) by creating fraudulent and unlawful court orders on July 14, 2021 and December 3, 2021 to target me and get me murdered in order to obstruct me from presenting my 'Victim Impact Statement' during the 'Sentencing Hearing' in the above 'Murder-for-Hire' federal criminal case.

Even though I reported this serious crime, coverup and bribery to the US Attorney General, Defendant GARLAND in April 2021 and October, 2021, there was no action. As my life and safety of my 2 small children were in danger, I filed this lawsuit in the US District Court in Chicago on January 5, 2022.

Even after I filed this lawsuit and served the complaint and summons, there was no action by Chicago Police and federal prosecutors in Chicago on this serious crime, which shows how deeply they are involved in this serious crime, bribery and coverup of crime.

NOTE:

Record citations are to the Appendix to this Petition ("nna") or to the 'Docket Entry' in the 7th Circuit Court Record ("CCDkt. #nn") or to the 'Required-Appendix' attached to the

Plaintiff-Appellant's Opening-Brief i.e., CCDkt. #14 ("RAnnn"), or to the 'Separate-Appendix' i.e., CCDkt. #15-1 and #15-2 ("SAnnn") or to the 'Docket Entry' in the Original Record ("Dkt. #nn") of the US District Court.

STATEMENT OF THE CASE

As I already provided the facts of the case in my Opening-Brief (**CCDkt. #14**, p.5-10) and in the Second Amended Complaint (**Dkt. #44**) and as explained with supporting exhibits in the Motion to Reconsider (**Dkt. #55**), following is the statement of facts:

A. A Marriage Scam and Severe Domestic Violence:

My husband, Defendant BHOGIREDDY along with his family scammed me in the name of 'marriage' by bringing me from India to the US just to have babies as US Citizens and then to get rid of me by getting me murdered. After getting married in May 2014, they rushed me to have a baby and the baby was born in June 2015. After I went back and waited in India for my Green Card stamping for almost a year and returned to the US on December 11, 2016, as I questioned him on December 14, 2016 about a sex video of him with a woman, BHOGIREDDY hit me and filed a **false** police report with Chicago Police against me on December 15, 2016 by lying that I attacked and injured him (**72a-75a**, for Police Report **RD#HZ552966**).

After the above, he inflicted severe domestic violence, intimidation and harassment against me. For one more baby for his family, to forcefully get me pregnant, BHOGIREDDY made me swallow ovulation medication and he sexually assaulted me multiple times between January and March 2017 and he took away my passport so that I could not escape. During pregnancy, he physically hit me multiple times. I delivered the 2nd baby in November 2017.

On May 3, 2018, when BHOGIREDDY threatened me that he would kill me and he would not leave any of my family members, I called the Chicago Police (**76a-91a, RD#JB248086**) and moved to a shelter along with my 2 children (one was 2 years old and the other was 5 months old). The children and I have been living away from him since then. The Cook County Domestic Violence Courthouse granted me an emergency Order of Protection (**2018OP73493**) against BHOGIREDDY on May 11, 2018.

As retaliation for reporting the violence to the Chicago Police, BHOGIREDDY took away my personal property like documents, expensive Indian dresses worth \$10,000 and gold jewelry worth \$81,570 USD (current value: \$110,000) in violation of the Order of Protection in effect and with the help of his father 'Prudhvi', a retired senior police officer from India and his sister 'Varija', a medical doctor from Fresno, California.

B. Bribery and Coverup of the Criminal Cases by Chicago Police, Prosecutors, Judges and Lawyers:

As I alleged clearly in the Second Amended Complaint (**Dkt. #44**, at p.40-65) and as explained with exhibits in the Motion to Reconsider (**Dkt. #55**, at p.5-7), when I reported the crime in May and July of 2018, after collecting all the evidence, the Chicago Police including Defendant BROWN, Detectives Samuel Truesdale and Danielle Davis who handled the investigation of the criminal cases, Sergeant Daniel Schaedel who handled my complaint against the police in 2019 with **Log #1092294** and Sergeant Steven Petrowski who handled my complaint against the police in 2021 with **Log #2020-4775**, covered up the felony criminal cases.

The cases covered up were for Battery, Criminal Sexual Assault and Theft of my personal property (given by my parents) like Gold Jewelry by violating an Order of Protection (**76a-91a**, for police reports **RD#JB248086, RD#JB337844 and RD#JB337916**), as BHOGIREDDY influenced Chicago Police, Cook County State Prosecutors, Judges, Lawyers (including my lawyers, one after another from 6 law firms) and Court appointed experts through bribery using illegal money in millions of dollars from India (**60a-62a and 63a-65a**, for example of transactions of illegal money). The coverup put my life in further danger from BHOGIREDDY and his family, and it resulted in further crime against me and my family members as stated below.

By filing for Divorce on August 8, 2018, BHOGIREDDY used my then lawyers Joshua Haid and Morgan Gay and, his attorney Defendant BUZINSKI and Guardian ad Litem Defendant WYPYCH and Judge Marya Nega in Cook County Domestic Relations (Family) court to terminate my Order of Protection fraudulently on September 11, 2018 by obstructing me from testifying about his crimes in the Court (**Dkt. #55**, p.5-6).

C. Murder-for-Hire Crime by BHOGIREDDY Against Me and My Uncle, and Conspiracy to Get Me Murdered by Defendants WALKER, WYPYCH, BUZINSKI, BOYLE and FIFE along with BHOGIREDDY and His Mother LEELA:

As I reported against Chicago Police to **COPA** (Civilian Office of Police Accountability) with **Log #1092294** in January 2019 for their coverup of the serious crime, by planning along with his father 'Prudhvi', starting from May 2019, BHOGIREDDY hired 2 teams of hitmen (undercover federal agents from ATF) to get me and my uncle from New Jersey, a key witness to the crimes, murdered in order to eliminate the witnesses and to cover up the criminal cases permanently. BHOGIREDDY and his mother 'Leela' threatened other witnesses with serious consequences if they helped me in any way. BHOGIREDDY wanted the murders to look like accidents. According to federal agent Andrew Karceski who testified during a trial in May 2021, the murder plan for my uncle included 'pushing him in

front of a train or beating him up badly to end up in coma' and for me, the plan was to 'inject a large dose of insulin when I sleep'.

In May 2021, based on the trial in the 'Murder-for-Hire' federal criminal case as mentioned below, I realized that Defendants: Judge WALKER, attorneys WYPYCH and BUZINSKI, and my then attorneys BOYLE and FIFE helped Defendant BHOGIREDDY in his preparations with murder plans as part of the conspiracy to get me murdered, by creating unlawful, fraudulent and forged court orders on July 25, 2019 (**92a-96a**) and on September 3, 2019 (**97a-98a**) (**Dkt. #44**, p.65-93 and **Dkt. #55**, p.12-24).

The orders included 'suddenly' changing my then 4 years old son's Pre-K school to a school 0.2 miles close to BHOGIREDDY's home (5.2 miles away from my home) and providing him with expanded and unsupervised parenting time so that children were with him 'before and when' the planned murder of me would happen. It also included having me communicate with him using the 'My Family Wizard' application so that he could monitor me for his murder plans.

After BHOGIREDDY changed the Pre-K school of the child using the above fraudulent court orders in September 2019, he brought one team of the hitmen (one of the 2 men resembled popular American singer '**Nick Jonas**') to the Cook County Domestic Relations Court during a hearing on October 2, 2019 morning, in order to show me to them. In the evening of October 2, 2019, BHOGIREDDY met the 2nd team of hitmen with

ATF special agent Andrew Karceski, asking him to proceed with the plan to get my uncle murdered.

On October 2, 2019 night, Federal agents from ATF got BHOGIREDDY arrested and filed a ‘Murder-for-Hire’ federal criminal case (*USA v. BHOGIREDDY – 1:19-CR-00769*) against him in the Federal District Court in Chicago on October 3, 2019. He was released on \$200,000 bond and home detention with GPS monitoring in the home of his sister Varija in Fresno, California.

On October 4, 2019, a federal agent ‘Andrew Karceski’ from ATF met me and notified me of the arrest of BHOGIREDDY for the crime against me and my uncle. On October 7, 2019, federal agents Andrew Karceski and the above-mentioned man who resembled American singer ‘**Nick Jonas**’ went to New Jersey to meet with my uncle ‘Seetaram Ganisetti’ in his home, to inform him of the crime as he was the other victim (identified as ‘Individual B’).

Even after the arrest of BHOGIREDDY, as bribed by him, Judge Defendant WALKER along with Defendant BUZINSKI once again created another fraudulent court order on May 18, 2020 (**99a-102a**) in favor of BHOGIREDDY in order to influence the federal court to move him from Fresno, CA to Chicago. On May 20, 2020, even the US District Court questioned the justification for that fraudulent court order due to the potential risk of danger to the ‘Individual A’ in the case, i.e., me (**103a-106a**).

I provided the facts of this conspiracy in steps along with the evidence in ‘**Argument IV**’ in my OpeningBrief (CCDkt. #14, p.17) and in ‘**Argument III**’ in my ReplyBrief (CCDkt. #26, p.17) (168a-177a).

D. Further Crimes By Defendant BHOGIREDDY While Being Out on Bail in the Murder-for-Hire Criminal Case:

Even while being out on bail in the ‘Murder-for-Hire’ criminal case, BHOGIREDDY continued to commit further crimes.

As further retaliation against me, in July 2020, BHOGIREDDY had his father ‘Prudhvi’ harass my parents in India by having his associates illegally occupy my parents’ land property through land-grabbing using forgery documents and with plans to get them kidnapped and murdered using a false police report with the help of Guntur (India) police. When my parents reported the serious crime, Visakhapatnam (in Andhra Pradesh, India) Police covered it up so far.

In November 2020, BHOGIREDDY along with his attorney Defendant BUZINSKI filed false information in the Cook County Court to evade paying the temporary child support as ordered by the court. He also evaded paying the pending arrears of child support. When I filed my response with the truth in the Court, as bribed by BHOGIREDDY, Judge Defendant YU evaded ruling on it, in order to help BHOGIREDDY evade paying the full temporary child support and the arrears.

On February 16, 2021, I reported these crimes to the federal prosecutors accordingly (**107a-112a**).

E. Coverup of Crimes Including Bribery, By Federal Prosecutors During the Trial of Murder-for-Hire Federal Criminal Case:

I provided all the information to federal prosecutors about BHOGIREDDY's criminal cases with Chicago Police and their coverup, evidence and information about his further crimes while being out on bail in the above criminal case with the help of his father, as part of my several meetings with them as I was the main victim (identified as 'Individual A') in the above federal criminal case (**107a-112a**, the last request I sent).

As I alleged clearly in the Second Amended Complaint (**41a-51a**) and (**Dkt. #44**, p.139-154) and as explained with exhibits in the Motion to Reconsider (**Dkt. #55**, p.23-28), Federal Prosecutors led by US Attorney John R. Lausch and Assistant US Attorney Jason A. Julien filed the 'Murder-for-Hire' charges against BHOGIREDDY only for trying to get my uncle murdered. During the Trial in the above case in May 2021, they obstructed me from testifying and they fraudulently covered up the criminal cases for Battery, Criminal Sexual Assault, Theft and Bribery crimes by BHOGIREDDY, which are the underlying crimes for the 'Murder-for-Hire' crime, and the "Murder-for-Hire crime by using the team with a hitman resembling American singer '**Nick Jonas**' to get me murdered and

his crimes while being out on bail, in their several efforts to get him acquitted.

This coverup can also be verified based on the Docket filings in the above 'Murder-for-Hire' criminal case with **No. 1:19-cr-00769**, in violation of Crime Victims' Rights Act, 18 U.S.C. § 3771, as listed below:

(i) On May 20, 2020, even the District Court questioned the justification for the fraudulent court order by state-court Judge Defendant WALKER due to the potential risk of danger to the 'Individual A' in the case, i.e., me, **Dkt. #60 (103a-106a)**,

(ii) On March 19, 2021, Federal prosecutor Jason Julien filed the 'witness list' with 6 witnesses for the trial without my name and my uncle's name even though we were the victims/witnesses to the crime, as the prosecutors wanted to jeopardize the trial and acquit BHOGIREDDY, **Dkt. #109**,

(iii) After I reported to Defendant GARLAND in March/April 2021 about the coverup via USPS Mail, federal prosecutor Julien contacted my uncle on May 6, 2021 for the first time since the case was filed on October 3, 2019. On May 7, 2021, Prosecutor Julien filed the 'witness list' with 6 witnesses for the trial, **Dkt. #137**. It only included my uncle's name but not mine. So, they wanted to completely cover up the criminal history of BHOGIREDDY by obstructing me from testifying to make sure that the complete crimes were not presented to the Jury,

(iv) Around the same time, over phone, a victim/witness coordinator 'Celia Mendoza' gave my uncle the wrong dates of May 19 to 21 for him to testify. During the trial, he found the correct date to testify to be on May 26, 2021.

(v) On Friday, May 14, 2021, Prosecutor Julien filed a 'motion' in the Court to allow my uncle as a victim/witness during the trial, **Dkt. #142**,

(vi) On Saturday, May 15, 2021, BHOGIREDDY's Defense attorney Gal Pissetzky filed the 'Response' for the motion, **Dkt. #144**,

(vii) On the same day, Prosecutor Julien filed the 'Reply' to the above 'Response', **Dkt. #145**. And, the Trial was about to start from Monday, May 17, 2021. That means, until then, they never wanted to bring me or my uncle as victim/witness to testify. During the trial, only 3 witnesses (including my uncle) were produced. That was how the federal prosecutors and defense lawyers gamed the system in favor of BHOGIREDDY to acquit him.

(viii) On October 15, 2021, Federal prosecutors filed the 'Sentencing Memorandum' in the court asking for 210 to 262 months of jail time for BHOGIREDDY, **Dkt. #178 (27a-40a)**. In that memo, they claimed that BHOGIREDDY does not have any criminal convictions before and this is the only crime he committed. They also concealed the real reason why BHOGIREDDY wanted to get me murdered, as they covered up all the actual series of felony crimes by him.

(ix) On October 29, 2021, BHOGIREDDY's defense attorney Gal Pissetzky filed his sentencing memo claiming that BHOGIREDDY does not have any criminal history and he asked for a sentence of 90 months only. With that, he attached 'Character Support Letters' from around 20 people for BHOGIREDDY, with false information and by concealing his criminal actions/history, **Dkt. #181**. It also includes a letter from BHOGIREDDY's father 'Prudhvi', who was part of the murder plans and further crimes against me as explained here.

Despite the above efforts of prosecutors, as my uncle managed to testify during the trial, on May 27, 2021, the federal Jury found BHOGIREDDY guilty of the crime to get my uncle murdered and he is currently incarcerated in Federal Prison (MCC) in Chicago.

F. Continuation of Murder Plans with Another Conspiracy by Defendants YU, HARACZ, WYPYCH, BUZINSKI, BONZA and BHOGIREDDY:

In order to release BHOGIREDDY from federal prison by claiming that there is no criminal history for him during the 'Sentencing Hearing', Defendants WYPYCH, Judge YU, BUZINSKI and BONZA colluded and as helped by Defendant Judge HARACZ later (**124a-125a**), came up with an unlawful and fraudulent court order as paid by BHOGIREDDY (through his attorney Defendant BUZINSKI, and his family) on July 15, 2021 (**115a-117a and 113a-114a**). The order was to appoint

Defendant BONZA to conduct an assessment for 'Zoom Parenting Time' for BHOGIREDDY while he is incarcerated in Federal Prison, even though there is no law to order such assessment and there is no such thing 'Zoom Parenting Time' available for inmates in Federal Prisons (**Dkt. #44**, at p.109-139 and **Dkt. #55**, at p.28-42).

Using the above order, Defendant BONZA asked me to give her 'Informed Consent for Psychotherapy' (**118a-119a and 120a-123a**). Using another fraudulent court order on December 3, 2021 (**126a-128a**), instead of conducting the assessment for BHOGIREDDY, Defendants WYPYCH and BONZA targeted me to force me to meet Defendant BONZA in her office to frame mental health issues and false criminal cases against me like I attacked her, to finally kill me with the help of Chicago Police, in order to obstruct me from presenting my 'Victim Impact Statement' during the 'Sentencing Hearing' in the 'Murder-for-Hire' case. The obstruction of me is to cover up the crimes of BHOGIREDDY like Domestic Violence, Theft and plans to get me murdered, similar to the way they were covered up during the 'Trial' and to obtain a favorable sentencing to release him from the Federal Prison by rigging the Federal Court in his favor.

As BHOGIREDDY was waiting for the execution of the above conspiracy to get me murdered, he got the 'Sentencing Hearing' scheduled for November 19, 2021 canceled, by changing his defense lawyers at the last minute on November 12, 2021. Even though it has been more than 2 years since the conviction on May 27,

2021, there has been no ‘Sentencing Hearing’ so far, especially, as this case is in progress.

I provided the facts of this conspiracy in steps along with the evidence in ‘**Argument IV**’ in my OpeningBrief (**CCDkt. #14**, p.26) and in ‘**Argument III**’ in my ReplyBrief (**CCDkt. #26**, at p.17) (**168a-177a**).

Every time I reported the ‘coverup of criminal cases’ by Chicago Police to authorities (COPA), BHOGIREDDY along with the other Defendants planned to get me killed once in 2019 and second time in 2021.

G. Inaction by US Attorney General Defendant GARLAND and Chicago Police Chief Defendant BROWN:

As I already stated in my ‘**Argument VII**’ in my OpeningBrief (**CCDkt. #14**, p.40), Chicago Police covered up the Domestic Violence and the Theft criminal cases against BHOGIREDDY, which resulted in further ‘Murder-for-Hire’ crime by him. I reported the coverup to COPA in January 2019 and the former Chicago Police Chief Eddie T. Johnson at his office on September 12, 2019 (**Dkt. #55-5**, Ex. BG, a copy of the letter).

On February 22, 2022, I also reported the inaction and coverup directly to Chicago Police Superintendent Defendant BROWN by USPS Mail accordingly, using a Request Letter for investigation (**134a-138a**) attaching a copy of the document with a timeline of my interactions with Chicago Police as I had already provided to Sergeant Steven Petrowski before (**SA136-147**) and

the last email to Sergeant Petrowski (**139a-145a**), who further covered up the crime. The Illinois Domestic Violence Act (70 ILCS 60/304) requires Police to take action against Domestic Violence crime (**SA156-157**). No action was taken by Defendant BROWN so far, even after serving the notice of this lawsuit in March (**Dkt. #29**) and May 2022 (**Dkt. #49**).

With their deliberate inaction by violating the Illinois Domestic Violence Act, even though they knew that my life was in danger, inflicting loss of my property, severe emotional distress and suffering, and fear for my life and safety of my children, the Chicago Police including Defendant BROWN willfully deprived me of my rights to 'Property' and 'Liberty' as protected by the Fourteenth Amendment of the US Constitution, without Due Process of Law, under Color of Law.

As I already stated in my '**Argument VIII**' in my OpeningBrief (**CCDkt. #14**, p.42) before, I reported the coverup of crime by Chicago Police, Judges, Lawyers, Court appointed experts and, by Federal Prosecutors during the Trial in May 2021, as influenced by BHO-GIREDDY through bribery, to the US Attorney General, Defendant GARLAND 2 times in April 2021 and in October 2021 (**146a-154a**, a copy of the request letter). I received a letter dated November 12, 2021 (**155a-156a**) from Defendant GARLAND's Office asking me to report the crime to the FBI, Judicial Inquiry Board and Illinois Attorney General, even though I had already reported to these authorities before. Hence, there was no action taken by Defendant GARLAND so far.

The inaction by Defendant GARLAND resulted in further coverup of crime and further willful violation of my rights under color of law by Defendants, YU, HARACZ, WYPYCH, BUZINSKI, BHOGIREDDY and BONZA, as part of the conspiracy to get me murdered, in order to obstruct me from presenting my 'Victim Impact Statement'.

Due to the above imminent danger to my life and safety of my children, I filed this case. As part of the Complaint in this action, I requested the Court for Declaratory injunctive relief by ordering Defendants GARLAND and BROWN for investigation of this serious fraud, crime and bribery, in order to stop and address these serious crimes, and Damages from 5 out of the 11 Defendants in this action (**66a-69a**).

H. Actions by Defendants to Cover up The Serious Crimes, After I Filed This Lawsuit:

Once I filed this case on January 5, 2022 and served the Complaint, following are the actions by the Defendants to cover up these serious crimes:

(i) To pause the murder conspiracy, on January 12, 2022, Defendant WYPYCH on behalf of Defendant BONZA, notified me via email (**129a-130a**) that BONZA was not available to conduct the 'assessment'. BONZA did not file any report to the Court about the assessment, as she was only working on murder conspiracy but not on any real assessment.

(ii) On January 19, 2022, Judge Defendant YU left my case and moved to another Calendar in the Court. And, the state-court case was reassigned to Judges Patrick Powers, Diana Rosario and Mitchell Goldberg consecutively, and they did not take any action on these crimes by judges and lawyers even though I had already filed the details of the crime and of this lawsuit.

(iii) Around the same time, Judge Defendant HARACZ moved from family court to Juvenile Justice Division.

(iv) As the Judges Defendants WALKER, YU and HARACZ could not face the truth and the evidence about their serious crimes including murder conspiracies and bribery, they did not even respond to the US District Court.

(v) Only 5 Defendants: BUZINSKI, WYPYCH, BOYLE, FIFE and BONZA responded to the summons in the US District Court.

(vi) On May 28, 2022, Defendant BONZA filed a ‘Motion to Dismiss’ (Dkt. #45). To cover up the serious crime, she made false claims to the district court to imply that she was appointed by the state-court to perform ‘Child Custody Evaluation’ (**131a-133a**) even though in truth, it was already completed by another psychologist Dr. Kerry Smith in May 2019 (**115a-117a, Item#3**). She also portrayed herself as a ‘Psychiatrist’ (i.e., Medical Doctor), even though in truth, she is a ‘Clinical Psychologist’, in order to fraudulently claim immunity.

(vii) In the Circuit Court, as part of their joint ‘ResponseBrief’ (**CCDkt. #19**), Defendants BUZINSKI, WYPYCH, BOYLE, FIFE and BONZA did not refute or dispute my facts about their murder conspiracies and bribery because of the strong evidence I provided in my ‘OpeningBrief’ (**CCDkt. #14**).

(viii) In June 2022, Defendant WALKER won an election without an opponent to become a Judge in District 1 of Illinois Court of Appeals effective from December 2022, with the support of powerful people like US Senator from Illinois, Dick Durbin (as per her Campaign website). Sen. Durbin is also the Chairman of the US Senate Judiciary Committee, which screens the nominations for federal judges and US Attorneys, and oversees the US Department of Justice, headed by Defendant GARLAND.

(ix) The federal prosecutor and the US Attorney John Lausch who was supposed to respond to this lawsuit in District Court on behalf of Defendant GARLAND, did not respond. Shockingly, US Attorney John Lausch also had the support of US Senator Dick Durbin, which got him that ‘US Attorney’ position (as per a public statement by Sen. Durbin on January 12, 2023).

(x) On October 11, 2022, US Attorney John Lausch filed a ‘Notice of No Brief’ in the Circuit Court (CCDkt. #16) by providing false information saying that Defendant GARLAND was never served the Complaint in this case (**157a**). On November 14, 2022, I filed a reply to that notice (**CCDkt. #25**) providing the truth about how the Complaint and Summons were served 3

times for both the US Attorney John Lausch (**Proof of Service: Dkt. #11, 36 and 53**) and Defendant GARLAND (**Proof of Service: Dkt. #12, 35 and 52**). In that reply, I also provided the details of how US Attorney John Lausch covered up the serious crimes including ‘Murder-for-Hire’, conspiracies to get me murdered and bribery (**158a-167a**).

(xi) On January 12, 2023, during a public statement regarding the issue of ‘Classified Documents in the possession of the US President Joe Biden’, Defendant GARLAND announced that US Attorney John Lausch was leaving his position. In March 2023, federal prosecutor John Lausch resigned from his position.

(xii) Chicago Police Chief, Defendant BROWN did not respond to the summons in the US District Court. In March 2023, he resigned from his position too.

(xiii) Defendant BHOGIREDDY did not respond to the summons in the District Court. As this case is in progress, in order to obstruct me from presenting my ‘Victim Impact Statement’, he made a series of requests to the district court to reschedule the ‘Sentencing Hearing’ with the help of his defense attorneys Joshua Herman and Todd Pugh and federal prosecutors. Hence, there has been no sentencing hearing so far, since the conviction on May 27, 2021.

I. Procedural Background:**Commencement of the Case:**

On January 5, 2022, I filed the original Complaint (Dkt. #1) in the above captioned case. On February 15, 2022, the Court dismissed my Original Complaint (**22a-23a**), ordering me to reduce the size of it.

On March 16, 2022, I filed the first amended Complaint (Dkt. #27) addressing the court order by reducing the size of the Complaint from 363 pages to 194 pages.

On April 1, 2022, the District Court dismissed the first amended complaint, ordering me to further condense the Complaint and the Court also listed a couple of observations made in the complaint, to be addressed by me (**24a-26a**).

On April 27, 2022, I filed the Second Amended Complaint (Dkt. #44), by reducing the size where possible and by providing additional information for clarity and to address the observations made by the Court. I also provided the reasons including 'Rule 9(b)', presence of several frauds and conspiracies and requirement of high standard of pleading, for the 192 pages length of the Second Amended Complaint accordingly (**41a-51a and 52a-59a**).

On April 28, 2022, Defendant BONZA filed a 'Motion to Dismiss' (Dkt. #45), with false information and false portrayal of her as a 'psychiatrist' i.e., a 'Medical Doctor', even though in truth, she is a clinical psychologist (**70a-71a**).

Dismissal of the Complaint:

On May 3, 2022, without letting the other 10 Defendants respond to the Complaint, and without allowing me to respond with truth and evidence to the above ‘Motion to Dismiss’, the District Court rushed and dismissed my Second Amended Complaint with a final Order and Judgment (**9a-17a**) using the false information from the above ‘motion’ as one of the reasons for dismissal. The Court erred in several aspects by misinterpreting the facts, claims and relief sought in the case, and by applying the laws wrongfully. The order also included contradicting statements to indicate: “the Complaint was lengthy, wide ranging and incredibly detailed” (**11a**) and the “Plaintiff’s conclusory allegations of joint action are simply insufficient to raise a reasonable inference” (**14a**), as explained further below.

At the same time, in the order (footnote on 10a), based on the ‘Government’s sentencing memo’ in the ‘Murder-for-Hire’ case (27a-40a), the District Court did acknowledge that BHOGIREDDY wanted to get me murdered too. However, the Court did not acknowledge why BHOGIREDDY wanted to get me murdered and, how and why federal prosecutors covered up the criminal history of him during the Federal Trial. The court order listed the conviction date incorrectly and the correct date is May 27, 2021.

Motion to Amend or Alter a Judgment:

On May 27, 2022, I filed a Rule 59(e) ‘Motion to Reconsider’ (Dkt. #55) the above Judgment and Order along with 64 exhibits supporting the allegations made in the Complaint and argued against the 8 errors in the order. The District Court denied the Motion on June 6, 2022, without addressing the errors as I reported (**18a-19a**).

Appeal to the Seventh Circuit Court of Appeals:

On August 1, 2022, I timely filed the ‘Notice of Appeal’ to the 7th Circuit Court of Appeals.

On August 11, 2022, the District Court issued an ‘Amended Judgment’ document (**20a-21a**) where the Court removed the previous statement “Decided by Judge Guzman on a motion to dismiss for lack of jurisdiction” from the previous judgment and instead, included a statement “Plaintiff’s second amended complaint [44] is dismissed. Judgment is hereby entered in favor of defendants and against plaintiff”.

On September 21, 2022, I filed my Opening Brief (**CCDkt. #14**) and a Separate-Appendix (**CCDkt. #15-1 and #15-2**), and I argued against the District Court’s conclusions that (I) the Court lacked jurisdiction, (II) the Second Amended Complaint violated ‘Rule 8(a)(2)’ and I failed to follow the Court Orders, (III) the Court should abstain from ‘Due Process’ claims, (IV) denied my claims for Declaratory relief against judges and Guardian ad Litem, Defendants WALKER, YU,

HARACZ and WYPYCH, citing absolute immunity even though I did not request any damages from them, (V) denied my claims against Defendants BOYLE, FIFE, BUZINSKI and BHOGIREDDY for damages even though they conspired with Defendants WALKER, YU, HARACZ and WYPYCH to deprive me of my civil rights by participating in the murder conspiracies, (VI) denied my claim against Defendant BONZA, by concluding that she is a court appointed psychiatrist and hence she is entitled to absolute immunity, even though in truth, she is a clinical psychologist but not a psychiatrist and she did not perform any court duties, (VII) denied my claim against Defendant BROWN for declaratory relief by ordering for investigation of the criminal cases covered up by Chicago Police, and (VIII) denied my claim against Defendant GARLAND for declaratory relief by ordering for investigation of the federal crimes for Violation of my Civil Rights under color of law through murder conspiracies, coverup of crime and bribery.

On October 25, 2022, Defendants BUZINSKI, WYPYCH, BOYLE, FIFE and BONZA filed their ‘Joint Response Brief’ (**CCDkt. #19**) and made 3 arguments: (I) the District Court was right in dismissing the Complaint for violation of ‘Rule 8(a)(2)’ and for failure to follow Court Orders, (II) The District Court was right in abstaining from my ‘Due Process Claims’, (III) Alternatively, the Court should affirm the dismissal for failure to state a claim. However, the Defendants did not state if the District Court was right in blatantly lying that Defendant BONZA is a psychiatrist (**13a**) even

though in truth, she is a clinical psychologist (**9a**). And, the Defendants did not state who directed the District Court to lie.

However, the Defendants did not refute or dispute my facts about their murder conspiracies and bribery because of the strong evidence I provided in my ‘OpeningBrief’.

On November 14, 2022, I filed my ‘ReplyBrief’ (**CCDkt. #26**) and clarified against the above unlawful arguments in my ‘**Arguments I and II**’. As Defendants contended that there was no agreement for the conspiracies, I provided clarification and details of the agreement in my ‘**Argument III**’ (**168a-177a**).

On May 11, 2023, the 7th Circuit Court affirmed the dismissal of the case under the grounds of ‘Abstention’ and ‘Violation of F.R.C.P. Rule 8(a)(2)’ without addressing the serious crimes including murder conspiracies, murder-for-hire and bribery by Defendants (**1a-7a**).

On June 20, 2023, I timely filed the ‘Petition for Rehearing en banc’ (**CCDkt. #29**), as the Court’s decision based on the above 2 grounds is unlawful and on July 21, 2023, the Court denied the petition (**8a**).



REASONS FOR GRANTING THE PETITION

Even though this case is about addressing the serious crimes against me, a crime victim, but not about interfering in an order or judgment of a state-court or

about parenting time, child custody or alimony, which are in the jurisdiction of a state-court, the Seventh Circuit Court unlawfully and wrongfully affirmed the dismissal by citing ‘Abstention from State-court’s divorce proceedings’ (**4a**).

Even though the US Supreme Court set the pleading standards in 2007 and 2009 for a complaint to have sufficient facts to survive a ‘motion to dismiss’ and it is being followed by 11 circuit courts including the Seventh Circuit, the same Seventh Circuit Court unlawfully affirmed the dismissal of the Complaint with sufficient facts, saying that it is a ‘Violation of Rule 8(a)(2) requiring only a short statement’ (**5a**). This unlawful decision effectively covered up a series of felony crimes including bribery in millions of dollars.

Shockingly, the Circuit Court treated the purported ‘Rule 8(a)(2) Violation’ as more serious than the above serious crimes to dismiss the case. And, a crime victim with death threats, has to go all the way to the US Supreme Court for investigation of the above crimes, which shows how the ‘Rule of Law’ broke down. Hence, in order to uphold the Rule of Law and the US Constitution, this Court’s intervention is required for the below reasons:

I. Seventh Circuit's Decision to Affirm Based on 'Abstention Grounds' is Unlawful and Missed to Address Very Important and Serious Issues of Bribery and Serious Crimes by Chicago Police, State-Court Judges and Federal Prosecutors

A. Issues are Exceptionally Important and of Public Interest

This case presents issues, which are exceptionally important and of public interest as both the District Court and the Seventh Circuit Court dismissed the case unlawfully by citing 'Abstention from State-court case' and 'Violation of F.R.C.P. Rule 8(a)(2)' without addressing the serious crimes for Battery, Criminal Sexual Assault, Theft of my property like gold jewelry, Murder-for-Hire, Murder Conspiracies and Public Corruption through Bribery in Millions of dollars using illegal money from India.

And the Defendants are powerful public officials like Chicago Police, State-court Judges and lawyers, supported by federal prosecutors as already explained above. The dismissal effectively provides cover for the Defendants' serious crimes in the name of the above 2 unlawful grounds, especially at the time when people are very worried about the ever-growing crime in Chicago.

In this case, against their oath to follow 'Rule of Law' and uphold the US Constitution and address the crime, the judicial officers and law enforcement officers

themselves are covering up the crime and participating in further crime against the crime victim.

If not intervened, as can be seen from the series of felony crimes listed in this case, the Defendants will continue their crimes without any accountability. And, the Circuit Court's decision to cover up the serious crimes promotes lawlessness among judicial officers and both state and federal law enforcement officers and finally, among the public in general, as if there is no 'Rule of Law' in the country.

B. A Seriously Required Vehicle for Crime Victims

This Court's intervention will help crime victims as a 'seriously required' vehicle, to seek relief when state or federal law enforcement officers cover up the crime or commit further crime against the crime victims, in favor of and as influenced by the offender(s) of the crime.

C. Investigation Will not Intrude into the State-Court Proceedings and My Request to Stay the Trial is Not Required Any More and Hence It is a Moot Point

As I already stated in my OpeningBrief (CCDkt. #14, p.7-10) and in my 'Motion to Reconsider' (Dkt. #55, p.41), the 3 Judges, Defendants WALKER, YU and HARACZ no longer have any role in the state-court case as the case was reassigned to new Judges Patrick

Powers, Diana Rosario and Mitchell Goldberg after I filed this federal lawsuit.

There is no activity in the state-court case proceedings as the Trial Judge Rosario already agreed and put the trial on hold on April 24, 2023 as the Court is waiting for the sentencing in the 'Murder-for-Hire' case against the petitioner of the case, BHOGIREDDY who is currently incarcerated in federal prison after his conviction in the above criminal case in May 2021.

Through my filings on September 28, 2022, December 12, 2022 and July 10, 2023, I already informed the state-court of this federal lawsuit and of my request for investigation of the crimes and bribery committed by 3 state-court Judges and lawyers. As I already stated in my 'Petition for Rehearing' (**CCDkt. #29**, p.6), I already requested the state-court for re-scheduling of the trial in the state-court case accordingly because the state-court needs to consider during the trial in the state-court, all the crimes committed by BHOGIREDDY during the marriage and during the proceedings of the case like murder conspiracies and 'murder-for-hire', bribery, etc. by conspiring with Judges and lawyers.

Therefore, my one of the requests for relief to stay the 'trial' in the state-court is no longer required and hence, it is a moot point for the court's concerns that any investigation of the crimes and bribery by Defendants WALKER, YU and HARACZ, will interfere with state-court's proceedings. And, the required investigation also will involve Chicago Police and federal

prosecutors who covered up the several felony criminal cases and bribery, and they are no way related to the state-court proceedings.

D. Wrongful Abstention and Declining to Investigate the Serious Crime and Bribery is Against the Principles of Rule of Law

The court wrongfully cited ‘Abstention Grounds’ by citing “*J.B. v. Woodard*, 993 F.3d 714, 722 (7th Cir. 2021)”, which was related to parenting time and child custody in State-court.

This case is not about requiring federal court’s intervention into state-court proceedings for parenting time or child custody for which state-court has the jurisdiction. As I already stated above and before, this case is about the federal court’s intervention to address the serious crime and bribery by Chicago Police and State-court Judges as further helped by federal prosecutors in Chicago, by ordering for investigation, because both state and federal law enforcements covered up the serious crimes and bribery, and they continue to help Defendants with further crime.

Earlier, the District Court already allowed investigation of BHOGIREDDY in the ‘Murder-for-Hire’ federal criminal case in 2019 (***USA v. BHOGIREDDY – No. 1:19-CR-00769***), while the state-court proceeding was in progress.

As the Judges Defendants WALKER, YU and HARACZ, and Defendants BUZINSKI, WYPYCH, BOYLE, FIFE and BONZA conspired with BHO-GIREDDY in the murder plans against me, they must be investigated too, as per the ‘Rule of Law’.

The Circuit Court’s decision to decline the investigation of the Defendants’ crimes is against the principles of ‘Rule of Law’ to stop and address crime, which require applying law equally without any fear or favor. The decision also wrongfully legalizes the serious crimes and bribery by state-court Judges Defendants WALKER, YU and HARACZ, and Chicago Police, committed under color of law.

II. Seventh Circuit’s Decision to Affirm Based on ‘Violation of Rule 8(a)(2)’ is Unlawful and It Conflicts With the Decisions by the US Supreme Court, 10 Other Circuit Courts and With Its Own Prior Decision

A. The Seventh Circuit’s Decision Conflicts With the Decisions by the US Supreme Court

As I already stated before in ‘**Argument II**’ in my OpeningBrief (CCDkt. #14, p.14) and in ‘**Argument I**’ in my ReplyBrief (CCDkt. #26, p.7) and in my ‘Motion to Reconsider’ (Dkt. #55, p.10), the standard for pleading is governed by F.R.C.P. Rule 8(a), F.R.C.P. Rule 9(b) when fraud is alleged and by doctrines from *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 570 (2007) and *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009).

Specifically, the US Supreme Court held that a plaintiff need not recite “detailed factual allegations,” but must provide “more than an unadorned, the-defendant-unlawfully-harmed-me accusation.” A pleading that offers “labels and conclusions” or “a formulaic recitation of the elements of a cause of action will not do.” Thus, a complaint alleging conspiracy must include “enough factual matter (taken as true) to suggest that an agreement was made.” *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 570 (2007). To survive a Rule 12(b)(6) motion to dismiss, a plaintiff must plead sufficient facts to state a claim that is “plausible on its face.” *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009).

Accordingly, I provided the facts sufficient to support the allegations for marriage scam, severe domestic violence involving Battery, Criminal Sexual Assaults, Theft of jewelry worth \$81,570 (current value: \$110,000) resulting in several felony criminal cases filed by Chicago Police, cover-up of criminal cases by Chicago Police, Judges and lawyers, Conspiracy to get me murdered, ‘Murder-for-Hire’ federal crime, cover-up of crime and bribery by federal prosecutors in Chicago and another conspiracy or continuation of the previous conspiracy to get me murdered to obstruct my Victim Impact Statement.

Even though I provided the pleading as per the above standards, well established by the above US Supreme Court’s decisions as followed by the other District Courts and Circuit Courts as explained below and as also followed by the same 7th Circuit Court, the Circuit Court concluded in this present case that the

Complaint is in violation of ‘Rule 8(a)(2) requiring a short statement’, which conflicts with the above US Supreme Court’s decisions and hence the Circuit Court’s decision in this case is unlawful.

B. The Seventh Circuit’s Decision Conflicts With the Decisions of the 10 Other Circuit Courts

10 other Circuit Courts held that a pleading needs to meet the doctrines from the US Supreme Court decisions as already listed above.

The 10 Circuit Courts in (1) *Saldivar v. Racine*, 818 F.3d 14 (1st Cir. 2016), (2) *Chamberlain v. City of White Plains*, 960 F.3d 100 (2d Cir. 2020), (3) *Trzaska v. L’Oreal USA, Inc.*, 865 F.3d 155 (3d Cir. 2017), (4) *Woods v. City of Greensboro*, 855 F.3d 639 (4th Cir. 2017), (5) *Brown v. Tarrant Cnty.*, 985 F.3d 489 (5th Cir. 2021), (6) *Bright v. Gallia Cnty.*, 753 F.3d 639 (6th Cir. 2014), (7) *Edwards v. City of Florissant*, 58 F.4th 372 (8th Cir. 2023), (8) *Austin v. University of Oregon*, 925 F.3d 1133 (9th Cir. 2019), (9) *Schell v. The Chief Justice & Justices of the Okla. Supreme Court*, 11 F.4th 1178 (10th Cir. 2021), and (10) *Simpson v. Sanderson Farms, Inc.*, 744 F.3d 702 (11th Cir. 2014), held that:

“To survive a motion to dismiss, a complaint must contain sufficient factual matter which, when taken as true, states ‘a claim to relief that is plausible on its face.’”

Hence, the Circuit Court's decision conflicts with the decisions of the 10 other Circuit Courts as listed above.

C. The Seventh Circuit's Decision Conflicts With Its Own Prior Decision

In *Cooney v. Rossiter*, 583 F.3d 967, 971 (7th Cir. 2009), while addressing the alleged conspiracy between state-court Judge, lawyer and court appointed experts and the necessary pleading requirements, the Seventh Circuit Court held as below:

*“Even before Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 570, 127 S.Ct. 1955, 167 L.Ed.2d 929 (2007), and Ashcroft v. Iqbal, ___ U.S. ___, 129 S.Ct. 1937, 1953, 173 L.Ed.2d 868 (2009), a bare allegation of conspiracy was not enough to survive a motion to dismiss for failure to state a claim. E.g., Loubser v. Thacker, 440 F.3d 439, 443 (7th Cir. 2006); Walker v. Thompson, 288 F.3d 1005, 1007-08 (7th Cir. 2002); Boddie v. Schnieder, 105 F.3d 857, 862 (2d Cir. 1997); Young v. Biggers, 938 F.2d 565, 569 (5th Cir. 1991). It was too facile an allegation. **But it was a narrow exception to the notice-pleading standard of Rule 8 of the civil rules – a rare example of a judicially imposed requirement to plead facts in a complaint governed by Rule 8.***

In Bell Atlantic the Supreme Court went further, holding that in complex litigation a complaint must, if it is to survive dismissal, make plausible allegations.

In Iqbal the Court extended the rule of Bell Atlantic to litigation in general”.

Therefore, in this current case, by quoting ‘FRCP Rule 8(a)(2) requiring only a short statement’ as the only governing rule for pleading standard and by completely disregarding the US Supreme Court’s *Bell Atlantic* and *Iqbal* decisions, and decisions from 10 other Circuit Courts and its own decision as quoted above, the Circuit Court’s decision to affirm to dismiss the case based on ‘Rule 8(a)(2) Violation’ for providing sufficient facts in the pleading, conflicts with the above decisions and hence, it is unlawful.

III. The Court Has the Authority to Order Investigation of the Serious Crimes Including Bribery

The Court has the authority to order Defendant GARLAND and Chicago Police Chief for investigation of the serious crimes as per 28 U.S.C. § 2201 and 2202, 5 U.S.C. § 702 and 42 U.S.C. § 1983. Hence, I request the Court to order Defendant GARLAND for investigation of these serious crimes under color of law and bribery in millions of dollars using illegal money from India, as per 5 U.S.C. § 702 as I already stated in ‘**Argument VIII**’ in my OpeningBrief (CCDkt. #14, p.42). I also request the Court to order the Chicago Police chief for investigation of the several felony criminal cases covered up by Chicago police officers and the murder conspiracies as I already stated in ‘**Argument VII**’ in my OpeningBrief (CCDkt. #14, p.40).

IV. The Seventh Circuit Failed to Address My Claims for Damages from Defendants BOYLE, FIFE, BUZINSKI, BHOGIREDDY and BONZA

The Court failed to address my claims for damages from Defendants BOYLE, FIFE, BUZINSKI, BHOGIREDDY and BONZA as they conspired with the state-court Judges, Defendants WALKER, YU and HARACZ in depriving me of my civil rights without due process of law, under color of law, by violating 18 U.S.C. §§ 241 and 242, and other State and Federal laws.

Hence, I request the Court to address my claims for damages as I already stated in ‘**Arguments IV, V and VI**’ in my OpeningBrief (CCDkt. #14, p.17) and in ‘**Argument III**’ in my ReplyBrief (CCDkt. #26, p.17).

V. The Seventh Circuit Provided False Facts and Information in the Order

A. False Reason Provided, for Filing This Case

In the order, the Court falsely stated the reason for filing the lawsuit as “*Usha Karri suspected that her husband was orchestrating a wide-ranging conspiracy to kill her, take her property, and gain custody of their two children. She brought a sprawling civil-rights complaint against him and numerous others . . .*”.

The truth is that the case was not filed based on suspicion. It was filed based on facts and as I already stated in my Complaint (**41a-51a**), based on the evidence I had already provided to the court, I realized and believed that Judges Defendants YU and HARACZ, and Defendants WYPYCH, BONZA and BUZINSKI conspired with BHOGIREDDY to get me murdered in order to cover up his crimes and to obstruct me from presenting my 'Victim Impact Statement' in the 'Murder-for-Hire' criminal case, as I already explained in the above sections.

B. False Information on Who Initiated the Divorce Proceedings and the Reason

In the Order, the Court falsely stated that I was the one who initiated the divorce proceedings. The truth is that it was my husband, BHOGIREDDY who filed for Divorce on August 8, 2018 to cover up his criminal cases after Chicago police filed several felony criminal cases against him on May 3, 2018 and July 6, 2018 as I already stated in my OpeningBrief (**CCDkt. #14**, p.5-7).

C. False Expertise of Defendant BONZA

In the Order, the Court falsely referred to Defendant BONZA as a court-appointed 'psychiatrist'. The truth is that she is a 'clinical psychologist' as I already stated in '**Argument VI**' in my OpeningBrief (**CCDkt. #14**, p.39).



CONCLUSION

WHEREFORE, in the interest of upholding the ‘Rule of Law’ to administer justice, I pray the Honorable Court for a writ of certiorari.

Date: September 19, 2023

Respectfully submitted,

USHA SOUJANYA KARRI

pro se

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Apt. #1004

Chicago, IL 60640

Phone: 708-400-2967

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No. _____

—◆—
**In The
Supreme Court of the United States**
—◆—

USHA SOUJANYA KARRI,
Petitioner,

v.

MERRICK B. GARLAND, et al.,
Respondents.

—◆—
**On Petition For Writ Of Certiorari
To The United States Court Of Appeals
For The Seventh Circuit**
—◆—

**APPENDIX TO THE
PETITION FOR WRIT OF CERTIORARI**
—◆—

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APPENDIX A

NONPRECEDENTIAL DISPOSITION

To be cited only in accordance with FED. R. APP. P. 32.1

**United States Court of Appeals
For the Seventh Circuit
Chicago, Illinois 60604**

Submitted March 22, 2023*

Decided May 11, 2023

Before

MICHAEL Y. SCUDDER, *Circuit Judge*

THOMAS L. KIRSCH II, *Circuit Judge*

DORIS L. PRYOR, *Circuit Judge*

No. 22-2363

USHA SOUJANYA KARRI, <i>Plaintiff-Appellant,</i>	Appeal from the United States District Court for the Northern District of Illinois, Eastern Division.
<i>v.</i>	
MERRICK B. GARLAND, et al., <i>Defendants-Appellees.</i>	No. 22 C 55 Ronald A. Guzmán, <i>Judge.</i>

* We have agreed to decide the case without oral argument because the briefs and record adequately present the facts and legal arguments, and oral argument would not significantly aid the court. FED. R. APP. P. 34(a)(2)(C).

ORDER

Usha Karri suspected that her husband was orchestrating a wide-ranging conspiracy to kill her, take her property, and gain custody over their two children. She brought a sprawling civil-rights complaint against him and numerous others for their roles in the alleged scheme to deprive her of due process. *See* 42 U.S.C. § 1983. After providing Karri two opportunities to amend, the district court dismissed her complaint with prejudice because she failed to comply with pleading requirements and because the relief she sought was foreclosed on abstention grounds. We affirm.

We recount the facts based on Karri's complaint and appellate briefs. *Stanard v. Nygren*, 658 F.3d 792, 794 (7th Cir. 2011). She alleged that her husband abused and manipulated her for many years. As the abuse escalated, she initiated divorce proceedings and sought custody of their children. After the divorce proceedings began, her husband plotted to kill her and an uncle of hers. Her husband unwittingly contacted an undercover federal agent posing as a hitman and was arrested. He was convicted, after trial, of soliciting a crime of violence. *See United States v. Bhogireddy*, No. 1:19-cr-00769 (N.D. Ill. May 27, 2021). He remains in federal custody, and his sentencing hearing is scheduled to take place shortly.

Karri sees her husband's attempt to hire a hitman as part of a broader plot to deny her a fair divorce proceeding and cover up his wrongdoing. She says that he bribed and conspired with state judges and private

divorce attorneys to secure favorable custody decisions and conceal his abuse. She also says that her husband persuaded federal prosecutors and the Chicago police to cover up evidence of the attempted hit and past incidents of sexual assault and abuse. For all of this, Karri sought damages, an injunction ordering the U.S. Department of Justice and the Chicago police to investigate the cover-up, and an injunction to stay her divorce proceedings until that investigation ended.

The district court struck Karri's complaint, which ran 363 pages, for not complying with federal pleading requirements. The court explained that Rule 8(a)(2) of the Federal Rules of Civil Procedure requires a short and plain statement of the claim, and her complaint clearly violated that rule. The court invited her to amend her complaint but warned that it would strike any amended complaint if it were not "significantly shorter."

Karri submitted an amended complaint that was 194 pages, and the court struck this complaint too. The amended complaint was "unwieldy," and the court stated that it could not discern what claims she was alleging and against whom. To help her amend her complaint again, the court advised her that certain defendants named in the complaint may be entitled to absolute immunity from suit and that she may not bring unrelated claims against different defendants in the same case.

Karri then filed a 192-page, second amended complaint that repeated her due process claims against the

same defendants. The court described this filing as bulky and unmanageable, and dismissed it under Rule 8(a). To the extent she sought injunctive relief that would interfere with the ongoing state-court divorce proceeding, the court found it appropriate to abstain from ruling on her due process claims. *See J.B. v. Woodard*, 997 F.3d 714, 723 (7th Cir. 2021). The court ruled in the alternative that there were other grounds for dismissal of the suit: absolute immunity barred her claims against the state-court judges, the guardian ad litem, and the court-appointed psychiatrist; she failed to state a plausible claim against the police officers, the private attorneys, and her husband; and her conspiracy allegations were too conclusory to state a claim.

Karri filed a motion for reconsideration that the court denied based on her failure to identify any manifest error of law or fact.

On appeal, Karri generally challenges the district court's dismissal of her complaint, but we begin with her challenge to the court's ruling on abstention, which, as a non-merits threshold matter, we address first. *See Meyers v. Oneida Tribe of Indians of Wis.*, 836 F.3d 818, 823 (7th Cir. 2016). She argues that because she seeks an injunction only to pause the state divorce proceedings to allow for an investigation of her husband, the degree of federal intervention she seeks in the state-court case is minimal.

To the extent Karri seeks injunctive relief, the district court appropriately abstained from ruling on her due process claim. In our recent decision in *J.B.*, we

held that the principles underlying the abstention doctrines—the principles of comity, equity, and federalism—require federal courts to abstain from cases that might interfere with state domestic-court proceedings, even when none of the abstention doctrines is a perfect fit. 997 F.3d at 722. Karri argues that she seeks not to intervene in the state domestic-court case, but to spur an investigation into fraud and corruption by state officials. But the injunctive relief she seeks would intrude into an ongoing state domestic-court proceeding—an area of law traditionally reserved for the states—and in such circumstances federal courts must stay on the sidelines. *Id.* at 722–23.

As for the court’s ruling that her complaint violated Rule 8(a)(2), she asserts that she could not present a short and plain statement of her case because she needed to describe the conspiracy and fraud of 11 separate defendants with particularity. But Rule 8(a)(2)’s requirements to present a short and plain statement of the case do not conflict with Rule 9(b)’s heightened pleading requirements for fraud and conspiracy: “it is possible to write a short statement narrating the *claim*—which is to say, the basic grievance—even if Rule 9(b) requires supplemental particulars.” *U.S. ex rel. Garst v. Lockheed-Martin Corp.*, 328 F.3d 374, 376 (7th Cir. 2003). The court acted well within its discretion to dismiss the remainder of Karri’s complaint for failing to conform with Rule 8(a)(2).

AFFIRMED.

**UNITED STATES COURT OF APPEALS
FOR THE SEVENTH CIRCUIT**

Everett McKinley Dirksen United States Courthouse Room 2722 - 219 S. Dearborn Street Chicago, Illinois 60604	Office of the Clerk [SEAL] Phone: (312) 435-5850 www.ca7.uscourts.gov
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FINAL JUDGMENT

May 11, 2023

Before

MICHAEL Y. SCUDDER, *Circuit Judge*
THOMAS L. KIRSCH II, *Circuit Judge*
DORIS L. PRYOR, *Circuit Judge*

No. 22-2363	USHA SOUJANYA KARRI, Plaintiff - Appellant v. MERRICK B. GARLAND, et al., Defendants - Appellees
Originating Case Information:	
District Court No: 1:22-cv-00055 Northern District of Illinois, Eastern Division District Judge Ronald A. Guzmán	

7a

The judgment of the District Court is AFFIRMED,
with costs, in accordance with the decision of this court
entered on this date.

/s/ Christopher Conway
Clerk of Court

APPENDIX B

**United States Court of Appeals
For the Seventh Circuit
Chicago, Illinois 60604**

July 21, 2023

Before

MICHAEL Y. SCUDDER, *Circuit Judge*

THOMAS L. KIRSCH II, *Circuit Judge*

DORIS L. PRYOR, *Circuit Judge*

No. 22-2363

USHA SOUJANYA KARRI, <i>Plaintiff-Appellant,</i>	Appeal from the United States District Court for the Northern District of Illinois, Eastern Division.
<i>v.</i>	
MERRICK B. GARLAND, et al.,	No. 1:22-CV-00055
<i>Defendants-Appellees.</i>	Ronald A. Guzmán, <i>Judge.</i>

ORDER

On consideration of the petition for rehearing en bank: filed by Plaintiff-Appellant Usha Soujanya Karri in the above case on June 20, 2023, no judge in active service has requested a vote thereon.

Accordingly, the petition for rehearing en Banc is DENIED.

APPENDIX C

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Usha Soujana Karri,)	
Plaintiff,)	
v.)	No. 22 C 55
Merrick Garland, et al.,)	Judge
Defendants.)	Ronald A. Guzmán

ORDER

For the reasons stated below, Plaintiff’s second amended complaint [44] is dismissed. Based on the claims alleged and Plaintiff’s previous failure to address this Court’s concerns regarding the length of and lack of precision in the complaint, the Court concludes that further amendment is futile. Civil case terminated. All pending motions are stricken as moot.

After the Court struck Plaintiff’s initial complaint, which consisted of 363 pages and 615 paragraphs, for failing to comply with Federal Rule of Civil Procedure 8(a), Plaintiff filed an amended complaint. The amended complaint included allegations of due process violations against 11 defendants, including Merrick Garland, Attorney General of the United States; David Brown, Superintendent of the Chicago Police Department; three state-court judges; a court-appointed guardian ad litem; a court-appointed clinical psychologist; three private attorneys; and Plaintiff’s estranged

husband, Venkatesh Bhogireddy. Many, if not all, of the claims appeared to relate, at least tangentially, to Plaintiff's tumultuous relationship with Bhogireddy, an ongoing state-court divorce proceeding, and the federal criminal case against Bhogireddy.¹

Plaintiff's first amended complaint was 194 pages and 360 paragraphs. The Court noted that the amended complaint remained unwieldy and directed Plaintiff to condense her allegations even further, instructing Plaintiff that she need not detail the entirety of her relationship with Bhogireddy or the other proceedings in state and federal court. The Court told Plaintiff that she need only allege the *basic* facts supporting her due process claims. *In re Barr*, 188 B.R. 565, 570 (Bankr. N.D. Ill. 1995) ("‘Notice’ pleading merely requires that plaintiff give notice to defendant of the theory behind claims alleged and the *basic* facts supporting those allegations.") (emphasis added).

¹ On April 22, 2021, Bhogireddy was charged in a superseding indictment with five counts of using a facility of interstate commerce in furtherance of the murder-for-hire of Individual B (the uncle of Plaintiff in the instant case) (Counts One through Three, and Counts Five and Six), and with one count of causing another to travel in interstate commerce in furtherance of the murder-for-hire of Individual B. (*United States v. Bhogireddy*, No. 19 CR 769, (N.D. Ill.).) On May 27, 2019, after a jury trial, Bhogireddy was found guilty on Counts One, Two, Four, Five, and Six, and was acquitted on Count Three. He is currently awaiting sentencing. The government's sentencing memorandum indicates that Bhogireddy told the hitman that Bhogireddy also wanted to have Plaintiff killed at some point in the future. (*Id.*, Gov't's Sentencing Mem., Dkt. # 178, at 2-6.)

Plaintiff's second amended complaint again alleges due process claims under 42 U.S.C. § 1983 against the same individuals listed in the first amended complaint. While lengthy, wide-ranging, and incredibly detailed, Plaintiff generally alleges fraud, retaliation, conspiracy, and other forms of misconduct by the defendants and numerous other individuals with respect to her divorce proceeding and other court actions. As just one example, the second amended complaint states in part as follows:

... Defendant Bhogireddy while being incarcerated in Federal Prison, planned to get me murdered with the help of Judges, Lawyers and Court appointed psychologist (i.e., YU, HARACZ, WYPYCH, BUZINSKI AND BONZA) from Cook County Domestic Relations (Family) Court in Chicago, along with direct or indirect help from Chicago Police, in order to cover up his crimes and to obstruct me from presenting my 'Victim Impact Statement' [at Bhogireddy's sentencing].

(2d Am. Compl., Dkt. # 4, at 4-5.) Many of Plaintiff's allegations include claims that various parties acted "fraudulently" in the divorce proceeding, including at least one judge issuing rulings to "get [Plaintiff] killed" as part of a second conspiracy. (*See, e.g., id.* ¶¶ 36, 37, 39, 41, 45.) Plaintiff also alleges that she "reported the entire scandal with very serious fraud and crime to the court and all the way up to the U.S. Attorney General Merrick B. Garland," (*id.* ¶¶ 45, 234), and to Chicago Police Superintendent David Brown. (*Id.* ¶ 120.) These

statements are a small sample of the voluminous allegations against the defendants.

Though minimally shorter in length at 192 pages, the second amended complaint now contains nine more paragraphs (369) than the initial amended complaint, which the Court had directed Plaintiff to condense. Indeed, Plaintiff states that “additional information has been provided in order to address the observations made by the Court. . . .” (*Id.* ¶ 7.) The second amended complaint remains bulky and unmanageable. Thus, Plaintiff’s failure to comply with the Court’s orders and Rule 8(a) constitutes a basis for dismissal.

In any event, to the extent that Plaintiff seeks injunctive relief that would interfere with the ongoing state-court divorce proceeding, it is appropriate for the Court to abstain from ruling on Plaintiff’s due process claims. *See J.B. v. Woodard*, 993 F.3d 714, 723 (7th Cir. 2021) (concluding that federal court should abstain from presiding over the Plaintiff’s due process claims because “[t]he adjudication of [the Plaintiff’s] due process claims threaten interference with and disruption of local family law proceedings—a robust area of law traditionally reserved for state and local government—to such a degree as to all but compel the federal judiciary to stand down”). Plaintiff “cannot compel the adjudication of claims that would inject a federal court into a contested and ongoing family court . . . dispute.” *Id.* at 722.

Assuming arguendo that dismissal for failure to abide by the Court’s orders and Rule 8 or on abstention

grounds is inappropriate, the Court would dismiss the complaint. Plaintiff's claims against Circuit Judge Debra Walker, Associate Judge William Yu, and Associate Judge David Haracz, the three state-court judges who have issued rulings associated with Plaintiff's divorce proceeding, are dismissed because "judges are absolutely immune from liability for any acts carried out in a judicial capacity." *Collins v. Carroll*, No. 21-CV-497-JPS-JPS, 2022 WL 220173, at *2 (E.D. Wis. Jan. 25, 2022). The same is true for Plaintiff's claim against Lynn Wypych, the guardian ad litem in the state-court divorce case, who Plaintiff claims, among other things, filed a false report with the state court. (2d Am. Compl., Dkt. # 44, ¶ 166.) "The Seventh Circuit has conferred absolute immunity on guardians ad litem for conduct that is 'closely related to a [guardian ad litem's] judicial duties.'" *Id.* (alteration in original; citation omitted). Likewise, Plaintiff alleges misconduct against Stephanie Bonza, the court-appointed psychiatrist, regarding her role in Plaintiff's state-court divorce proceedings. Bonza is entitled to absolute immunity with respect to Plaintiff's allegations against her. *Cooney v. Rossiter*, 583 F.3d 967, 970 (7th Cir. 2009) (court-appointed experts, including psychiatrists, are absolutely immune from civil liability) (collecting cases).

With respect to the claim against Superintendent David Brown, Plaintiff alleges that various Chicago police officers did not pursue her reports of domestic violence and theft against Bhogireddy and subsequently covered up the inaction. (2d Am. Compl., Dkt. # 44, ¶ 120, at 56-63.) According to Plaintiff, she "reached

out to the current Chicago Police Superintendent David O. Brown, via social media accounts for him and Chicago police, to report the coverup of criminal cases by Chicago Police.” (*Id.* ¶ 120, at 63.) Plaintiff states no cognizable federal claim against Superintendent Brown, who Plaintiff appears to name solely because of his supervisory role over Chicago police officers. Section 1983, however, requires personal involvement in the alleged constitutional violation, *see Kuhn v. Goodlow*, 678 F.3d 552, 556 (7th Cir. 2012) (citations omitted), which Plaintiff does not allege. United States Attorney General Merrick Garland is dismissed as a defendant for the same reason.

Regarding the three private attorneys, Janet Boyle, Arin Fife, and Jami Buzinski, Plaintiff contends, in allegations too numerous to recount here, that practically every interaction with them was rife with fraud and misconduct as well as an intent to do her harm, both physically and in her divorce proceeding. “[S]ection 1983 does not apply to ‘merely private conduct, no matter how discriminatory or wrongful.’” *Livnjak v. Right Residential II-Fund2, LLC*, No. 16 C 1518, 2016 WL 4734404, at *2 (N.D. Ill. Sept. 12, 2016) (citation omitted). Plaintiff’s conclusory allegations of joint action are simply insufficient to raise a reasonable inference that the attorneys reached an understanding with state actors to deprive Plaintiff of her constitutional rights.

Similarly, Plaintiff’s failure to plausibly allege state action in connection with her allegations against

Bhogireddy, a private citizen, also doom her constitutional claims against him.

Finally, to the extent Plaintiff seeks to allege a conspiracy between any or all the defendants to violate her due process rights, “[a] mere conclusory allegation that a conspiracy was afoot is not sufficient to support a claim.” *Lester v. Walton*, No. 15-cv-1383-MJR, 2016 WL 617463, at *4 (S.D. Ill. Feb. 16, 2016). Plaintiff’s allegations of conspiracy are too conclusory and fantastical to state a claim. *See Scully v. Goldenson*, 751 F. App’x 905, 908 (7th Cir. 2018) (“[T]he[] allegations of a vast conspiracy among all the defendants, with a hint of paranoia to them, do not strike us as sufficiently plausible to state a claim.”)

For the reasons discussed above, the Court dismisses Plaintiff’s second amended complaint. Based on the claims alleged and Plaintiff’s previous failure to address this Court’s concerns regarding the length of and lack of precision in the complaint, the Court concludes that further amendment is futile. All pending motions are stricken as moot. Civil case terminated.

Date: May 3, 2022 /s/ Ronald A. Guzmán
Ronald A. Guzmán
United States District Judge

**IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN DISTRICT OF ILLINOIS**

Usha Soujanya Karri,
Plaintiff(s),
v.
Merrick B. Garland et al,
Defendant(s).

Case No. 22-cv-00055
Judge Ronald A. Guzmán

JUDGMENT IN A CIVIL CASE

Judgment is hereby entered (check appropriate box):

- ☐ in favor of plaintiff(s)
and against defendant(s)
in the amount of \$ _____,
which ☐ includes _____ pre-judgment interest.
☐ does not include pre-judgment interest.

Post-judgment interest accrues on that amount at
the rate provided by law from the date of this judg-
ment.

Plaintiff(s) shall recover costs from defendant(s).

-
- ☐ in favor of defendant(s)
and against plaintiff(s)

Defendant(s) shall recover costs from plaintiff(s).

- ☐ other
-

17a

This action was (*check one*):

- ☐ tried by a jury with Judge _____ presiding, and the jury has rendered a verdict.
- ☐ tried by Judge _____ without a jury and the above decision was reached.
- ☒ decided by Judge Guzmán on a motion to dismiss for lack of jurisdiction.

Date: 5/3/2022 Thomas G. Bruton, Clerk of Court
Kerwin Posley, Deputy Clerk

APPENDIX D
UNITED STATES DISTRICT COURT
FOR THE Northern District of Illinois –
CM/ECF NextGen 1.6.3
Eastern Division

Usha Soujanya Karri		
Plaintiff,		Case No.: 1:22-cv-00055
v.		Honorable
Merrick B. Garland, et al.		Ronald A. Guzman
Defendant.		

NOTIFICATION OF DOCKET ENTRY

This docket entry was made by the Clerk on Monday, June 6, 2022:

MINUTE entry before the Honorable Ronald A. Guzmán: Before the Court is Plaintiff's motion for reconsideration of the Court's order dismissing her case for failure to comply both with this Court's orders and Federal Rule of Civil Procedure ("Rule") 8(a), on abstention grounds, and for failure to state a claim under Rule 12(b)(6). Where a motion is filed within 28 days of entry of judgment, the court treats it as a Rule 59(e) motion to alter the judgment. Rule 59(e) authorizes relief only in "exceptional cases" and permits a court to amend an order or judgment only if the movant demonstrates a manifest error of law or fact, or if the movant presents newly discovered evidence that was not previously available. See *Willis v. Dart*, No. 16–1498, 671 F. App'x 376, 377 (7th Cir. Dec. 9, 2016) (quoting

GonzalezKoenke v. West, 791 F.3d 801, 807 (7th Cir. 2015)). The Court has carefully reviewed Plaintiff's lengthy filings in support of her motion for reconsideration, in which she primarily rehashes arguments she previously made; these are an improper basis for relief Von Ryburn v. Obaisi, 14 CV 4308, 2022 WL 1444309, at *2 (N.D. Ill. May 6, 2022) ("[M]otions for reconsideration are not at the disposal of parties who want to rehash old arguments."). With respect to Plaintiff's other arguments, the Court can discern no basis on which to reconsider its order. Plaintiff's motion to reconsider [55] is denied. Mailed notice. (kp,)

ATTENTION: This notice is being sent pursuant to Rule 77(d) of the Federal Rules of Civil Procedure or Rule 49(c) of the Federal Rules of Criminal Procedure. It was generated by CM/ECF, the automated docketing system used to maintain the civil and criminal dockets of this District. If a minute order or other document is enclosed, please refer to it for additional information.

For scheduled events, motion practices, recent opinions and other information, visit our web site at ***www.ilnd.uscourts.gov***.

APPENDIX E
IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN DISTRICT OF ILLINOIS

Usha Soujanya Karri,
Plaintiff(s),
v.
Merrick B. Garland et al,
Defendant(s).

Case No. 22-cv-00055
Judge Ronald A. Guzmán

AMENDED JUDGMENT IN A CIVIL CASE

Judgment is hereby entered (check appropriate box):

- ☐ in favor of plaintiff(s)
and against defendant(s)
in the amount of \$ _____,
which ☐ includes _____ pre-judgment interest.
☐ does not include pre-judgment interest.

Post-judgment interest accrues on that amount at
the rate provided by law from the date of this judg-
ment.

Plaintiff(s) shall recover costs from defendant(s).

-
- ☐ in favor of defendant(s)
and against plaintiff(s)

Defendant(s) shall recover costs from plaintiff(s).

21a

☒ other: Plaintiff's second amended complaint [44] is dismissed. Judgment is hereby entered in favor of defendants and against plaintiff.

This action was (*check one*):

- ☐ tried by a jury with Judge _____ presiding, and the jury has rendered a verdict.
- ☐ tried by Judge _____ without a jury and the above decision was reached.
- ☒ decided by Judge Guzman.

Date: 8/11/2022 Thomas G. Bruton, Clerk of Court
Kerwin Posley, Deputy Clerk

APPENDIX F
UNITED STATES DISTRICT COURT
FOR THE Northern District of Illinois –
CM/ECF LIVE, Ver 6.3.3
Eastern Division

Usha Soujanya Karri Plaintiff,	Case No.: 1:22-cv-00055
v.	Honorable
Merrick B. Garland, et al.	Ronald A. Guzman
Defendant.	

NOTIFICATION OF DOCKET ENTRY

This docket entry was made by the Clerk on Tuesday, February 15, 2022:

MINUTE entry before the Honorable Ronald A. Guzman: Plaintiff has filed a 363—page, 615—paragraph complaint against various individuals for allegedly violating her due process rights with respect to actions they took both during her divorce proceedings and other pending court matters. Federal Rule of Civil Procedure (“Rule”) 8(a)(2) requires a “short and plain statement of the claim showing that the pleader is entitled to relief. . . .” Plaintiff’s complaint clearly violates this rule, so the complaint is stricken. Plaintiff is granted leave to file an amended complaint that complies with Rule 8(a)(2); any amended complaint shall be filed no later than March 18, 2022. The Court admonishes Plaintiff that it will strike the amended complaint if it is not significantly shorter. Defendant Jami

Budzinski's motion to dismiss [18] is stricken without prejudice to renewal at a later date, if necessary. Mailed notice. (kp,)

ATTENTION: This notice is being sent pursuant to Rule 77(d) of the Federal Rules of Civil Procedure or Rule 49(c) of the Federal Rules of Criminal Procedure. It was generated by CM/ECF, the automated docketing system used to maintain the civil and criminal dockets of this District. If a minute order or other document is enclosed, please refer to it for additional information.

For scheduled events, motion practices, recent opinions and other information, visit our web site at ***www.ilnd.uscourts.gov***.

APPENDIX G

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Usha Soujana Karri,)	
Plaintiff,)	
v.)	No. 22 C 55
Merrick Garland, et al.,)	Judge
Defendants.)	Ronald A. Guzmán

ORDER

For the reasons stated below, Plaintiff's amended complaint [27] is stricken. Plaintiff's second amended complaint shall be filed no later than April 29, 2022.

After the Court struck Plaintiff's initial complaint, which consisted of 363 pages and 615 paragraphs, for failing to comply with Federal Rule of Civil Procedure 8(a), Plaintiff filed an amended complaint. The amended complaint includes allegations of due process violations against 11 defendants, including Merrick Garland, Attorney General of the United States; David Brown, Superintendent of the Chicago Police Department; three state-court judges; a court-appointed guardian ad litem; a court-appointed clinical psychologist; three private attorneys; and Plaintiff's estranged husband, Venkatesh Bhogireddy. Many, if not all, of the claims appear to relate, at least tangentially, to Plaintiff's ongoing divorce proceeding from Bhogireddy and the federal criminal case against him.

Plaintiff's amended complaint is 194 pages and 360 paragraphs. The Court admonished Plaintiff that it would strike the amended complaint if it was not considerably shorter. While the amended complaint is shorter than the first one, it remains unwieldy, and the Court is unable to discern what claims Plaintiff is alleging and against whom. "Rule 8(a) requires parties to make their pleadings straightforward, so that judges and adverse parties need not try to fish a gold coin from a bucket of mud." *U.S. ex rel. Garst v. Lockheed-Martin Com.*, 328 F.3d 374, 378 (7th Cir. 2003). Plaintiff is once again directed to further condense her allegations. One way Plaintiff might do this is to list the specific conduct by each defendant that she believes violated her constitutional rights. Plaintiff need not detail the entirety of her relationship with Bhogireddy or the other court proceedings; she need only allege the *basic* facts supporting her due process claims. *In re Barr*, 188 B.R. 565, 570 (Bankr. N.D. Ill. 1995) ("‘Notice’ pleading merely requires that plaintiff give notice to defendant of the theory behind claims alleged and the *basic* facts supporting those allegations.") (emphasis added).

Without opining on the merits of Plaintiff's claims, the Court makes several observations, which may assist Plaintiff as she drafts her second amended complaint. First, "judges are absolutely immune from liability for any acts carried out in a judicial capacity." *Collins v. Carroll*, No. 21-CV-497-JPS-JPS, 2022 WL 220173, at *2 (E.D. Wis. Jan. 25, 2022). Moreover, "[t]he Seventh Circuit has conferred absolute immunity on

guardians ad litem for conduct that is ‘closely related to a [guardian ad litem’s] judicial duties.’” *Id.* (alteration in original). Finally, “a plaintiff cannot bring *unrelated* claims against different defendants in the same case.” *Ducksworth v. Utter*, No. 21-CV-197-PP, 2022 WL 394991, at *4 (E.D. Wis. Feb. 9, 2022) (“A plaintiff may join multiple defendants in a single case only if the plaintiff asserts at least one claim against each defendant that arises out of the same events or incidents and involves questions of law or fact that are common to all the defendants.”) (emphasis in original).

Date: April 1, 2022 /s/ Ronald A. Guzmán
Ronald A. Guzmán
United States District Judge

APPENDIX H

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA		No. 19 CR 769
v.		
VENKATESH BHOGIREDDY		Hon. Andrea R. Wood

GOVERNMENT'S POSITION PAPER
AS TO SENTENCING FACTORS

The UNITED STATES OF AMERICA, by its attorney, JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, hereby submits its sentencing memorandum with respect to defendant Venkatesh Bhogireddy. The government respectfully requests that the Court sentence Bhogireddy within the applicable Guidelines range of 210 to 262 months' imprisonment. Further, the government requests that the Court sentence Bhogireddy to at least 70 months on Counts One and Two, at least 70 months on Counts Four and Five, and at least 70 months on Count Six, to be served consecutively.

I. BACKGROUND

On November 1, 2019, Venkatesh Bhogireddy was charged in a six-count indictment with soliciting the murder of Individual B over a period of approximately four months, in violation of Title 18, United States Code, Section 373(a) (Count One); using a facility of

interstate commerce in furtherance of the murder-for-hire of Individual B, in violation of Title 18, United States Code, Section 1958(a) (Counts Two through Four, and Six); and causing another to travel in interstate commerce in furtherance of the murder for hire of Individual B, in violation of Title 18, United States Code, Section 1958(a) (Count Five). *See* R. 12.

On April 22, 2021, Bhogireddy was charged in a superseding indictment with five counts of using a facility of interstate commerce in furtherance of the murder-for-hire of Individual B (Counts One through Three, and Counts Five and Six), in violation of Title 18, United States Code, Section 1958(a), and with one count of causing another to travel in interstate commerce in furtherance of the murder-for-hire of Individual B (Count Four), in violation of Title 18, United States Code, Section 1958(a). *See* R. 127.

On May 27, 2019, after a jury trial, Bhogireddy was found guilty on Counts One, Two, Four, Five, and Six, and was acquitted on Count Three. *See* R. 160. Bhogireddy is currently scheduled to be sentenced by the Honorable Andrea R. Wood on October 28, 2021, at 1:30 p.m. R. 177.

II. THE OFFENSE¹

In May 2019, Bhogireddy tasked an acquaintance with locating a hitman for Bhogireddy. Unbeknownst to Bhogireddy, the acquaintance contacted law enforcement. The acquaintance eventually gave Bhogireddy the telephone number for a “hitman.” However, the “hitman” was actually an undercover ATF special agent. Bhogireddy met with the hitman on June 6, 2019, in Joliet, and told the hitman that he wanted to kill his wife, with whom he was going through a contentious divorce. But Bhogireddy did not want to get caught. Thus, Bhogireddy told the hitman, after consulting with his father on the matter, Bhogireddy wanted to kill his wife’s uncle, Individual B, instead. Bhogireddy told the hitman that he wanted to kill Individual B because Bhogireddy believed Individual B was supporting Bhogireddy’s wife financially in the divorce, and also putting ideas into her head that were causing problems for Bhogireddy vis-à-vis the divorce proceedings.

During the recorded meeting, Bhogireddy and the hitman agreed upon a price to murder Individual B—\$8,000. Bhogireddy told the hitman that he would provide him with Individual B’s home address in New Jersey, and would pay the hitman some up-front money to go to New Jersey and plan out how he could murder Individual B. Bhogireddy and the hitman also

¹ The version of facts set forth below comes from the Government’s Version of the Offense, referred to in the Presentence Investigation Report (“PSR”). See PSR ¶ 8.

discussed getting “drop” phones that were not connected to them, to aid in getting away with the murder. Bhogireddy and the hitman discussed meeting again once Bhogireddy had activated a drop phone and had gathered the information about Individual B to provide to the hitman.

A. Counts One and Two

On July 1, 2019, at approximately 2:56 p.m., Bhogireddy called the hitman from his drop phone. During the recorded phone call, Bhogireddy told the hitman that he had the money and photos of Individual B, and asked when he and the hitman could meet again. They agreed to meet the same day. Later that day, at about 5:59 p.m., Bhogireddy called the hitman back and asked to reschedule the meeting to the following day, July 2, 2019. These calls are Count One and Count Two, respectively.

Bhogireddy and the hitman met on July 2, 2019, in Joliet. During the meeting, Bhogireddy gave the hitman an envelope containing: (1) a piece of paper with Individual B’s name and address on it; and (2) two photographs of Individual B. Bhogireddy also gave the hitman \$1,500 in up-front costs to travel to New Jersey. Bhogireddy asked the hitman to watch Individual B, follow his movements, and plan to come back to Chicago to meet with Bhogireddy again to discuss how the hitman could murder Individual B. During the meeting on June 6, 2019, and again during this meeting, Bhogireddy told the hitman to plan the murder and to

take his time. Bhogireddy told the hitman during this meeting that he thought murdering Individual B would solve his problems, because with Individual B gone, his wife's bank would be gone. Bhogireddy told the hitman that later he would want his wife killed, and that he would want her death to look like an accident.

B. Counts Four and Five

The hitman went to Individual B's home in New Jersey on July 22, 2019. This travel in interstate commerce in furtherance of the murder-for-hire is Count Four. At approximately 5:16 p.m., the hitman called Bhogireddy from a convenience store parking lot down the street from Individual B's home. During the recorded conversation, Bhogireddy asked the hitman if he would be taking pictures (the hitman did take pictures). Bhogireddy also told the hitman to follow Individual B to try and see where he goes, adding: "[W]e need to know where he is going. What way is easy for us[,] all these things." This phone call is Count Five. The hitman texted Bhogireddy a picture of Individual B's home after this call ended.

Bhogireddy met with the hitman again on August 26, 2019, in Joliet, after the hitman had returned from New Jersey. During this meeting, the hitman told Bhogireddy that he could have killed Individual B while he was in New Jersey; specifically, that he could have shot Individual B at a convenience store and made it look like a robbery. Bhogireddy reiterated to the hitman

during this meeting that he wanted to kill both Individual B and his wife. Specifically, that Bhogireddy wanted to kill Individual B first, and then one year later when things had cooled down, he wanted to kill his wife. Bhogireddy told the hitman that he wanted to move forward with the plan to murder Individual B in a month or two, after a court date in the divorce proceeding that was coming up in September. Bhogireddy and the hitman discussed that the hitman required half of the \$8,000 up front to murder Individual B, and that Bhogireddy had already paid the hitman \$1,500.

C. Count Six

Bhogireddy agreed to meet with the hitman on October 2, 2019. At approximately 6:28 p.m., Bhogireddy called the hitman and told him that Bhogireddy was outside of their normal meeting place. But because the hitman had not heard from Bhogireddy that day, the hitman had gone to a restaurant with some other ATF agents. After clearing it with his supervisor, the hitman called Bhogireddy back at approximately 6:32 p.m., and told Bhogireddy during this recorded phone call to meet him at the restaurant instead of at their normal meeting place.

The hitman set up a portable audio and video recorder and waited for Bhogireddy. When Bhogireddy arrived at the restaurant, Bhogireddy immediately handed the hitman \$2,000 (at this point, \$3,500 in total) and told the hitman to murder Individual B and to make it look like an accident. Bhogireddy told the

hitman that he had again consulted with his father on how to murder Individual B, and that his father told him that it had to look like an accident. Bhogireddy and the hitman discussed the ways the hitman could make the murder of Individual B look like an accident. At one point during the meeting, the hitman threw out the idea of pushing Individual B in front of a train. Bhogireddy told the hitman to go to New Jersey and to take his time and plan out the murder, and that if it cost more than they had agreed upon as a result that wasn't a big deal to Bhogireddy.

The hitman asked Bhogireddy whether Bhogireddy agreed that the hitman could proceed with murdering Individual B if the hitman went to New Jersey and saw an opportunity to do so, to which Bhogireddy replied that he was in agreement. Bhogireddy and the hitman went on to discuss getting rid of their drop phones after the murder was complete, and how they would arrange to meet after the murder so that Bhogireddy could pay the hitman the remainder of the money for the murder. Bhogireddy reiterated to the hitman during this meeting that, in the future, he wanted his wife killed by way of making it look like an accident as well. As the meeting was concluding, the hitman said to Bhogireddy, "So, the next time you hear from me it will be over, right?" Bhogireddy responded by telling the hitman to tell Bhogireddy when he was going to New Jersey. The hitman responded, "But you are good with it?" Bhogireddy replied that he was, and went on to tell the hitman to plan and take his time.

After Bhogireddy walked away from the table, he stopped in the parking lot, turned around, and came back to the table where the hitman was sitting. When Bhogireddy got back to the table, he told the hitman that he liked the idea of pushing Individual B in front of a train. But he admonished the hitman that he should not be seen pushing Individual B in front of a train. The hitman told Bhogireddy that he would “get some crazy guy to do it.” Bhogireddy was arrested shortly after this meeting concluded.

The phone call at approximately 6:32 p.m. between Bhogireddy and the hitman to coordinate this meeting is Count Six.

III. SENTENCING GUIDELINES CALCULATION

The government agrees with the criminal history and offense level calculations set forth in the PSR submitted by the United States Probation Office.

A. Bhogireddy’s Total Offense Level

Bhogireddy’s total offense level is **37** based upon the following:

- The base offense level is 33, pursuant to Guideline § 2A1.5(a). *See* PSR ¶ 21.
- Because the offense involved the offer or the receipt of anything of pecuniary value for undertaking the murder, 4 levels are added,

pursuant to Guideline § 2A1.5(b)(1). *See* PSR ¶ 22.

B. Bhogireddy's Criminal History Category

Bhogireddy's criminal history category is **I** because Bhogireddy did not have any criminal convictions prior to committing the instant offense.

Bhogireddy's total offense level of 37, when combined with his criminal history category of I, results in an advisory Sentencing Guidelines imprisonment range of 210 to 262 months.

IV. APPLICATION OF THE STATUTORY SENTENCING FACTORS

A. The Seriousness of the Offense and the Need to Promote Respect for the Law, Provide Just Punishment, and Afford Adequate Deterrence

A sentence within the applicable Guidelines range of 210 to 262 months' imprisonment would reflect the seriousness of Bhogireddy hiring a hitman to murder Individual B, provide just punishment, afford adequate deterrence, and promote respect for the law. Bhogireddy asked his acquaintance from the tire shop to locate a hitman for him. Instead, Bhogireddy's acquaintance contacted law enforcement. But for Bhogireddy's acquaintance contacting law enforcement instead of finding an actual hitman, Individual B might very well be dead. Individual A might be dead

as well, as Bhogireddy told the hitman that he wanted to kill Individual A about one year later after things cooled down.

Bhogireddy repeatedly met in person and spoke on the phone with who Bhogireddy believed was a hitman over a four-month period. Bhogireddy twice paid the “hitman,” asked the hitman to go to Individual B’s house in New Jersey, and took steps to avoid detection by law enforcement, such as purchasing a “drop phone.” All of which is to say: Bhogireddy’s plan to murder Individual B was a premeditated one. Bhogireddy repeatedly asked the hitman to “plan” and to “take his time.” At the first meeting between Bhogireddy and the hitman, Bhogireddy told the hitman that Bhogireddy had discussed with his father who to murder (Individual B as opposed to Individual A) before Bhogireddy had ever met the hitman. At the last meeting, Bhogireddy told the hitman that Bhogireddy had again discussed the plan to murder Individual B, with his father, and that this time the topic of discussion was how to murder Individual B (making it look like an accident).

Further, Bhogireddy drove from Deerfield to Joliet each time Bhogireddy met with the hitman. With no traffic, this commute is at least two hours roundtrip. In order to meet the hitman between approximately 6:00 p.m. and 7:00 p.m. on a weekday, Bhogireddy would have had to commute for several hours in order to meet with the hitman on any given occasion. This underscores how serious Bhogireddy was about planning to have Individual B murdered. Bhogireddy’s sentence

should reflect the serious nature of hiring a professional to murder someone, and then consulting with the hitman for four months.

Counts One and Two were committed on the same day within hours of each other. The Court could make Bhogireddy's sentence on these two counts run concurrently. However, weeks had passed between the conduct giving rise to Counts One and Two and the conduct giving rise to Counts Four and Five. For Counts One and Two, Bhogireddy was setting up the second meeting with the hitman on the following day. For Counts Four and Five, Bhogireddy had actually paid the hitman, had given the hitman pictures of Individual B and Individual B's address, sent the hitman to New Jersey, and had asked the hitman to follow Individual B while the hitman was in New Jersey.

Bhogireddy's sentence on Count Six should be served consecutively to his sentence on the other counts of conviction. Over two months had passed in between the hitman speaking to Bhogireddy from New Jersey on July 22, 2019, and Bhogireddy meeting with the hitman for the final time on October 2, 2019. Structuring Bhogireddy's sentence in this way reflects the escalation of Bhogireddy's conduct in planning to murder Individual B. Sentencing Bhogireddy to at least 70 months' imprisonment on these three groupings would allow the Court to render a sentence within the Guidelines range.²

² The United States Probation Office has recommended that the Court sentence Bhogireddy to 42 months' imprisonment on

B. The History and Characteristics of the Defendant

Bhogireddy only has one criminal conviction, which is a conviction for the instant offense, a premeditated plan to murder Individual B. This is extremely serious conduct. The fact that Bhogireddy only has one conviction is mitigating in some ways; it is aggravating in other ways. As set forth in the PSR, Bhogireddy had a “good” childhood and was raised in a stable family environment. *See* PSR ¶ 45. Bhogireddy is a father to two young children and was working for a technology company that paid him approximately six figures annually. *See* PSR ¶ 69. In spite of these advantages in life, Bhogireddy chose to embark on a plan that would have had his children’s great uncle and possibly their mother murdered merely because Bhogireddy did not like the way his divorce from Individual A was going.

Further, there are other troubling allegations relating to Bhogireddy’s history and characteristics. *See* PSR ¶ 38. The nature and circumstances of the instant offense tends to color at least some of those allegations, though they are only allegations.

Despite not having a history of criminal convictions prior to committing the instant offense, the Guidelines already take that into account when

each count of conviction, each to be served consecutively. Structuring Bhogireddy’s sentence in this way would also allow the Court to render a sentence within the applicable Guidelines range.

setting forth Bhogireddy's Guidelines range of 210 to 262 months' imprisonment. The Guidelines range merely underscores the seriousness of the conduct for which Bhogireddy has been convicted.

V. SUPERVISED RELEASE CONDITIONS

The government agrees with all of the conditions of supervised release proposed by U.S. Probation, including that the Court impose a three-year term of supervised release on each count to run concurrently. In particular, discretionary conditions 6 and 8 (prohibiting Bhogireddy from meeting or communicating with anyone known to be engaging in criminal activity and prohibiting Bhogireddy from possessing a dangerous weapon) are of paramount importance to Bhogireddy's supervision given the nature of this offense.

VI. CONCLUSION

For the reasons stated above, the government respectfully requests that the Court sentence Bhogireddy within the applicable Guidelines range of 210 to 262 months' imprisonment. Further, the government requests that the Court sentence Bhogireddy to at least 70 months on Counts One and Two, at least 70

40a

months on Counts Four and Five, and at least 70 months on Count Six, to be served consecutively.

Respectfully submitted,

JOHN R. LAUSCH, JR.
United States Attorney

By: */s/ Jason A. Julien*

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APPENDIX I

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 Pro Se

**UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF ILLINOIS
 EASTERN DIVISION**

USHA SOUJANYA KARRI,)	Case No. 1:22-cv-00055
Plaintiff,)	
)	Judge:
vs.)	Ronald A. Guzman
)	
MERRICK B. GARLAND,)	Magistrate Judge:
Attorney General of the)	Jeffrey Cummings
United States,)	
)	SECOND AMENDED
DAVID O. BROWN,)	COMPLAINT FOR
Superintendent of Chicago)	DECLARATORY
Police Department,)	AND INJUNCTIVE
)	RELIEF AND,
DEBRA B. WALKER,)	DAMAGES UNDER
Circuit Judge)	THE CIVIL RIGHTS
)	ACT, 42 U.S.C. § 1983
WILLIAM YU,)	
ASSOCIATE JUDGE,)	DEMAND FOR
)	JURY TRIAL
DAVID E. HARACZ,)	
Associate Judge,)	(Filed Apr. 27, 2022)
)	
LYNN WYPYCH,)	
Guardian ad Litem,)	
)	
JANET E. BOYLE, Attorney,)	
)	
ARIN R. FIFE, Attorney,)	

STEPHANIE BONZA,)
Psychologist,)
JAMI M. BUZINSKI,)
Attorney,)
and VENKATESH)
BHOGIREDDY,)
Defendants.)

I. NATURE OF THE ACTION

1. I, the Plaintiff Usha Soujanya Karri as Pro Se, bring this Action for Declaratory Judgment and Declaratory Relief with Injunction pursuant to 28 U.S.C. §§ 2201 and 2202 and, for Damages pursuant to 42 U.S.C. § 1983, requesting relief from deprivation and conspiracy to deprive me of my civil rights as protected by the Fourteenth Amendment of the US Constitution, without ‘Due Process of Law under ‘Color of State Law’, as there is a serious threat to my life and safety of my 2 children, from actions of the defendants as part of their retaliation against me for reporting serious fraud and crime including the ‘coverup of crime’ by Chicago Police, to the court and to obstruct me from presenting my ‘Victim Impact Statement’ during ‘Sentencing Hearing’ in a ‘Murder-for-Hire’ federal criminal case against Defendant BHOGIREDDY. This is part of the second attempt and conspiracy to get me murdered to cover up the crimes of Defendant BHOGIREDDY in order to rig the State Court and this Federal Court in Chicago in his favor fraudulently, driven by bribery in millions of Dollars using illegal money from India, as part of an international scandal spanning from India to the United States.

2. The reason for obstruction of me from the above mentioned 'Sentencing Hearing' is that serious felony Domestic Violence crimes underlying the above 'Murder-for-Hire' criminal case were covered up fraudulently during the Trial in this Federal Court, which shows the seriousness and urgency of this 'Action' as explained below:

- (i) The Federal Prosecutor and Assistant US Attorney, Jason Julien knowingly and fraudulently concealed the information about serious Domestic Violence inflicted on me and the corresponding felony criminal cases for Battery, Criminal Sexual Assault (**Police Report RD# JB337844**) and Theft of my Gold Jewelry (**RD# JB337916**) against Defendant BHOGIREDDY (which were covered up by Chicago Police fraudulently), from presenting to Federal Jury during the Trial in the above mentioned 'Murder-for-Hire' case (**USA v. BHOGIREDDY – Case# 1:19-CR-00769, filed on October 3, 2019**) in May 2021, with the help of Federal Judge, Andrea R. Wood, who was presiding over the federal criminal case and the Trial (as explained in Paragraph **#268** on **Page 148** with details).
- (ii) Even the Federal Judge Andrea Wood mentioned the above Domestic Violence crime during the Jury selection process on May 19, 2021.
- (iii) The Federal Prosecutor tried to influence the Jury in favor of Defendant BHOGIREDDY: by obstructing me by not calling me to testify (as I was the main victim in the above criminal

case, identified as ‘Individual A’) during the Trial, to conceal the real motive and to cover up the crimes like severe Domestic Violence, theft of my gold jewelry, plans to get me murdered and the criminal actions by Defendant BHOGIREDDY while he was being out on bail in this criminal case including plans to kidnap and murder my parents in India; by providing wrong dates to my uncle ‘Seetaram Ganiseti’ (the other victim in the case, identified as ‘Individual B’) for him to testify, so that he would miss the actual date during the Trial and by allowing Defense lawyer to use fraudulent court orders from Family court as evidence in support of Defendant BHOGIREDDY.

- (iv) Since my uncle planned for extended stay on his own, he could testify during the Trial the following week (i.e., on May 26, 2021) and Defendant BHOGIREDDY was found ‘guilty’ by the Federal Jury on May 27, 2021 and was sent to Federal Prison immediately. **The outcome of the verdict was not as expected and as planned by Defendant BHOGIREDDY, his Defense lawyers, Federal Prosecutor Jason Julien and the Federal Judge Andrea Wood.**
- (v) The conviction was not even published on the website of the US Attorney’s Office of Northern District of Illinois.
- (vi) **The whole process followed as above raises serious questions and jeopardizes the integrity of Federal Prosecutors from US Attorney’s Office and this Federal**

Court in Chicago, by obstructing and misleading the crime victims, in violation of Crime Victims' Rights Act, 18 U.S.C. § 3771, to make sure that real truth and, serious fraud and crime are not reported to this same Federal Court and the Federal Jury during the Trial, which resulted in further more crime as explained below. This also raises questions about fairness in adjudication of past, ongoing and future cases in this Federal Court.

- (vii) In order to obtain favorable sentence (like No More Jail Time') in the Federal Court with the help of Federal Prosecutors and Federal Judge, by making sure that history of Domestic Violence criminal cases and other serious crimes are not revealed and not recorded again (similar to the Federal Trial) during the presentation of my 'Victim Impact Statement' in the Court, Defendant BHOGIREDDY while being incarcerated in Federal Prison, planned to get me murdered with the help of Judges, Lawyers and Court appointed psychologist (i.e., Defendants YU, HARACZ, WYPYCH, BUZINSKI and BONZA) from Cook County Domestic Relations (Family) Court in Chicago, along with direct or indirect help from Chicago Police, in order to cover up his crimes and to obstruct me from presenting my 'Victim Impact Statement'.
- (viii) As Defendant BHOGIREDDY has been waiting for the above planned murder of me, he got the last 'Sentencing Hearing scheduled for

November 19, 2021', cancelled with the excuse of changing his Defense lawyers in this Federal Court on November 12, 2021 with no further date set for the 'Sentencing Hearing' so far (i.e., it has been close to 1 year since the conviction on May 27, 2021).

- (ix) As I already reported (for 2 times) to COPA against Chicago Police for their misconduct of covering up the criminal cases against Defendant BHOGIREDDY, Chicago Police are waiting for the planned murder of me. as retaliation against me and to cover it up similar to the way they covered up the felony Domestic Violence criminal cases against Defendant BHOGIREDDY.
- (x) On October 8, 2021 and April 1, 2021, I reported the above coverup of serious fraud and crime by Federal Prosecutors, Chicago Police, Judges, Lawyers and Court appointed experts to the US Attorney General. Merrick Garland, with no action so far.

3. Similar to the way I explained above, the deprivation of my rights was done through a series of criminal actions against me like 'marriage scam' to have babies as US Citizens, severe domestic violence, coverup of felony criminal cases by Chicago Police, as I reported against Chicago Police, by filing for Divorce, Defendant BHOGIREDDY used the family court for further coverup of the crime through conspiracy to get me murdered, 'Murder-for-Hire' to get me and my uncle murdered to eliminate the witnesses, depriving me of my personal property and temporary child support

for my children, coverup of the crime during the Trial for 'Murder-for-Hire' federal criminal case (as mentioned above) and, the latest and second conspiracy to get me murdered, with the help of Judges, lawyers and court appointed experts in Cook County Domestic Relations (Family) Court and Chicago Police, **along with well coordination of this crime by Federal Prosecutors from US Attorney's Office in Chicago and Defense lawyers of Defendant BHOGIREDDY.**

4. And, the Federal Judge Andrea Wood is completely aware of this whole scheme with serious fraud and crime to rig this Federal Court in favor of Defendant BHOGIREDDY in order to release him from the Federal Prison. This can be verified based on the Docket filings made in the above federal criminal case.

5. According to the Fed. R. Civ. P. 9(b) for Pleading Special Matters:

9(b) FRAUD OR MISTAKE; CONDITIONS OF MIND. In alleging fraud or mistake, a party must state with particularity the circumstances constituting fraud or mistake. Malice, intent, knowledge, and other conditions of a person's mind may be alleged generally.

6. Since the defendants are very powerful people like officers from Chicago Police, Judges, Lawyers and Court appointed experts, and the allegations include serious fraud and crime including murder plans and bribery with wide range and large number of Defendants and their conducts are interconnected, and prior

decisions by US Supreme Court in the past cases required the pleading to be of high standard with sufficient facts, I provided the supporting facts as per the Fed. R. Civ. P. 9(b), in addition to Fed. R. Civ. P. 8(a) accordingly.

Court Order as of April 1, 2022, Ordering Me to Amend the First Amended Complaint:

7. As per the Court Order as of April 1, 2022 (Docket #30), the First Amended Complaint filed on March 16, 2022 (Docket #27) has been amended to shorten it. And at the same time, additional information has been provided in order to address the observations made by the Court in the above order, which brought this Second Amended Complaint to 192 pages due to the reasons mentioned in **Paragraph #6** above, from the First Amended Complaint of 194 pages. Any further removal of facts will result in serious injustice to me and further coverup of the serious fraud and crime being reported to this Court.

8. As raised in the above Court Order, I only provided the main incidents from my marriage with Defendant BHOGIREDDY to support the allegations of marriage scam and severe Domestic Violence, which led to further fraud and crime in covering up the Domestic Violence crimes by all Defendants. including during the Federal Trial in this Court. This is the common fact for all Defendants against whom I have listed the related claims accordingly.

9. As suggested in the above Court Order, for clarity in the allegations and facts listed in this Complaint, I have provided '**Table 1**' and '**Table 2**' with conducts of all Defendants along with their page location in **Paragraph #30**. I have also listed the high-level summary of conducts of all Defendants in **Subsection 'A' of Section V**, starting from **Paragraph #31 on Page 17**.

10. As pointed out in the above Court Order, I completely understood the fact that Judges and Guardian ad Litem have absolute immunity and hence, I did not demand any damages from them right from the start of this lawsuit. I only demanded damages from Defendants who conspired with the Judges and Guardian ad Litem in committing crimes against me as part of depriving my rights without Due Process of Law, under Color of Law.

11. However, Judges and Guardian ad Litem do not have immunity from Declaratory Relief and for their criminal actions. In this case, they helped one parent (Defendant BHOGIREDDY) with his plans to get the other parent (me) murdered as part of 2 conspiracies to get me murdered, putting my life and safety of my children at risk by depriving me of my right to liberty' and conspiring to deprive me of my right to 'Live' without Due Process of Law under Color of Law, which is a violation of **18 U.S.C. § 242**.

12. According to 18 U.S.C. § 242:

Whoever, under color of any law, statute, ordinance, regulation, or custom, willfully subjects

any person in any State, Territory, Commonwealth, Possession, or District to the deprivation of any rights, privileges, or immunities secured or protected by the Constitution or laws of the United States, . . . shall be fined under this title or imprisoned not more than one year, or both; and if bodily injury results from the acts committed in violation of this section or if such acts include the use, attempted use, or threatened use of a dangerous weapon, explosives, or fire, shall be fined under this title or imprisoned not more than ten years, or both; and if death results from the acts committed in violation of this section or if such acts include kidnapping or an attempt to kidnap, aggravated sexual abuse, or an attempt to commit aggravated sexual abuse, or an attempt to kill, shall be fined under this title, or imprisoned for any term of years or for life, or both, or may be sentenced to death.

13. According to the website of Department of Justice (DOJ) in reference to the 18 U.S.C. § 242:

Persons acting under color of law within the meaning of this statute include police officers, prisons guards and other law enforcement officials, as well as judges, care providers in public health facilities, and others who are acting as public officials.

14. Hence, in the interest of Justice and in the interest of integrity of this Federal Court system and considering the large number of Defendants involved in this serious scandal, I respectfully request the Honorable Court to allow this Second Amended Complaint with facts listed as per Fed. R. Civ. P. 8(a) in

conjunction with Fed. R. Civ. P. 9(b), to proceed in this Action based on merits of the facts related to serious fraud and crime provided to the Court, as this serious fraud and crime were previously covered up fraudulently by Defendants in State Court and Law Enforcement Agencies and in this Federal Court by Federal Judge and Federal Prosecutors from the US Attorney's Office (from DOJ) in Chicago.

15. Therefore, I respectfully request the Honorable Court to grant me the Declaratory Judgment and Declaratory relief through permanent Injunction by ordering for investigation of the serious fraud and crime committed under Color of Law by depriving me of my rights, in order to stop and address it, and grant me Damages from Defendants who conspired with Judges and Guardian ad Litem in depriving me of my rights under Color of Law, as determined by the Jury.

* * *

APPENDIX J

	<u>Conduct</u>	<u>Defendants Involved</u>
A	Summary of Conducts of all Defendants	
B	A Scam in the Name of Marriage to Have Babies as US Citizens	BHOGIREDDY
C	Domestic Violence Even During Pregnancy and False Police Report Filed Against Me	BHOGIREDDY
D	Assault with Threats to My Life, Destroying Evidence, and Theft of My Gold Jewelry	BHOGIREDDY
E	Influencing the Shelter Staff to Obtain Information About Me Fraudulently and Illegally	BUZINSKI and BHOGIREDDY
F	Coverup of Crimes with the Help of Attorneys I Hired to Represent Me Like Joshua Haid and Morgan Gay, by Getting My Order of Protection Terminated Fraudulently, with the Help of Judge Marya Nega	BUZINSKI, WYPYCH and BHOGIREDDY
G	Coverup of Domestic Violence Criminal Cases by Chicago Police	BHOGIREDDY and BROWN

H	Coverup of Crime and First Criminal Conspiracy to Get Me Murdered Using Fraudulent and Forged Court Orders and Murder-for-Hire Federal Case Against BHOGIREDDY as He Hired Hit-men	WALKER, WYPYCH, BUZINSKI, BHOGIREDDY, BOYLE and FIFE
I	Continued Retaliation While Being Out on Bail	BHOGIREDDY
J	Evading Rulings to Deprive Me of Temporary Child Support and Arrears, to Cover up the Crime	YU, BUZINSKI and BHOGIREDDY
K	Serious Fraud and Second Conspiracy to Get Me Murdered with the Help of Psychologist in Order to Get BHOGIREDDY Released from Federal Prison by Covering up the Domestic Violence and Theft Crimes	YU, HARACZ, WYPYCH, BUZINSKI, BHOGIREDDY and BONZA
L	Coverup or Domestic Violence and Theft Crimes During Trial, by Federal Prosecutors from US Attorney's Office in Chicago and Inaction by US Attorney General Merrick Garland on the Coverup and, Reporting the Coverup to US Lawmakers	GARLAND

Table: 2

	<u>Conduct / Element of Action</u>	<u>Defendants Involved</u>	<u>Page Range</u>
A	Factual Introduction at High Level		17 to 24
B	A Scam in the Name of Marriage to Have Babies as US Citizens	BHOGIREDDY	24 to 29
C	Domestic Violence Even During Pregnancy and False Police Report Filed Against Me	BHOGIREDDY	29 to 35
D	Assault with Threats to My Life, Destroying Evidence, Reporting to Chicago Police, Order of Protection and Theft of My Gold Jewelry	BHOGIREDDY	35 to 38
F	Influencing the Shelter Staff to Obtain Information About Me Fraudulently and Illegally	BHOGIREDDY and BUZINSKI	38 to 40
F	Coverup of Crimes with the Help of Attorneys I Hired to Represent Me	BHOGIREDDY and BUZINSKI	40 to 55

	F(i). Defendant BHOGIREDDY was Arrested by Chicago Police	BHOGIREDDY	45 to 46
	F(ii). Termination of My Order of Protection Fraudulently with the Help of My Attorneys Joshua Haid and Morgan Gay and Judge Marya Nega	BHOGIREDDY, BUZINSKI and WYPYCH	46 to 51
	F(iii). Threatening of Witnesses	BHOGIREDDY	51 to 54
	F(iv). Fraudulent Report by Psychologist. Dr. Kerry Smith	BHOGIREDDY, BUZINSKI and WYPYCH	54 to 55
G	Coverup of Domestic Violence Criminal Cases by Chicago Police	BHOGIREDDY and BROWN	56 to 65
H	Serious Fraud and First Criminal Conspiracy to Get Me Murdered		65 to 93
	H(i). Serious Fraud with the Help of My Personal Injury Attorney Charles Adler	BOYLE, FIFE, BUZINSKI and BHOGIREDDY	65 to 68

	H(ii). Continuation of Serious Fraud and First Conspiracy to Get Me Murdered	WALKER, WYPYCH, BUZINSKI, BOYLE, FIFE and BHOGIREDDY	68 to 86
	H(iii). Death Threats Again upon Unsupervised Visitation Granted by the Court	BHOGIREDDY	86 to 87
	H(iv). Murder-for Hire Federal Criminal Charges	BHOGIREDDY	87 to 88
	H(v). Another Team of People Hired to Get Me Murdered	BHOGIREDDY	88 to 90
	H(vi). Fraudulent Court Orders to Influence the Federal Criminal Court	WALKER, BUZINSKI and BHOGIREDDY	90 to 93
I	Continued Retaliation While Being Out on Bail	BHOGIREDDY	93 to 99
J	Evading Rulings to Deprive Me of Temporary Child Support and Ar-rears		99 to 109

	J(i). Evading Rulings on Response and Motion for Temporary Child Support	YU, BUZINSKI and BHOGIREDDY	99 to 103
	J(ii). Fraudulent Report by Guardian ad Litem (GAL) Submitted to the Court	WYPYCH	103 to 106
	J(iii). Trial and Conviction in the 'Murder-for-Hire' Federal Criminal Case	BHOGIREDDY	106 to 109
K	Serious Fraud and Second Conspiracy to Get Me Murdered	YU, WYPYCH, BUZINSKI, BHOGIREDDY and BONZA	109 to 139
	K(i). Fraudulent Recommendation for Zoom Parenting Time	WYPYCH	110 to 112
	K(ii). Fraudulent Actions by Psychologist	BONZA	113 to 115
	K(iii). Retaliation Against me	YU, WYPYCH and BUZINSKI	115 to 118
	K(iv). Reporting the Serious Fraud and Crime Committed by Judges to Chief Judge, Timothy C. Evans	WALKER and YU	118 to 119

	K(v). Reporting the Serious Fraud and Crime Committed by Judges to Judicial Inquiry Board	WALKER and YU	119 to 119
	K(vi). Petition filed to Substitute Judge for Cause. to Substitute Defendant YU	YU	120 to 122
	K(vii). Coverup of Crime by Defendant HARACZ	HARACZ, YU, WYPYCH and BUZINSKI	122 to 125
	K(viii). Second Conspiracy to Get Me Murdered	YU, WYPYCH, BUZINSKI, BHOGIREDDY and BONZA	125 to 139
	K(ix). Influencing the 'Sentencing Hearing' in 'Murder-for-Hire' Federal Criminal Case	BHOGIREDDY	133 to 133
L	Coverup of Crime by Federal Prosecutors and Inaction by US Attorney General	GARLAND	139 to 155
	L(i). Reporting to Other Authorities and Lawmakers		139 to 147

	L(ii). Coverup of Domestic Violence Crimes During Federal Trial by Prosecutors from US Attorney's Office	BHOGIREDDY	148 to 155
VI	Claims 1 to 10 for Relief		155 to 189

A. Factual Introduction at High Level

31. My husband, Defendant BHOGIREDDY scammed me in the name of marriage just to have babies as US Citizens. As I questioned him about a sex video of him with a woman, he physically hit me and he filed a false complaint with Chicago Police against me saying that I

* * *

APPENDIX K

I was completely shocked, terrified and devastated to find that I got trapped in a danger in the name of marriage.

65. Around the middle of November 2016, Defendant BHOGIREDDY visited India.

66. In December 2016 (just before leaving for the US), when I asked Defendant BHOGIREDDY for registering our marriage in India, he had his father PRUDHVI attack me verbally, saying that I was looking to harass them for their property. During the attack, PRUDHVI asked me to wait for another baby to be born before they could register the marriage in India. At that time, he insulted me with very foul language and threatened me that if I went against their will, they could harm me and my parents.

Note: PRUDHVI also confirmed the fact of ‘rejecting to register the marriage in India’ as part of his interview with Dr. Kerry Smith as part of her 604.10b Custody evaluation for Cook County Domestic Relations court, conducted between November 2018 and April 2019.

67. Based on the above, my parents and I understood that Defendant BHOGIREDDY and his family deceived and scammed us in the name of marriage and took advantage of us being soft people, by dominating us using their cunning tactics. I also understood that Defendant BHOGIREDDY and his family did not bring me to

their home as a daughter-in-law. They just brought me to the US from India to have babies as US Citizens and to get rid of me when they are done with me.

Illegal Money. from India in the Form of Gold Items:

68. As the Indian Government made an announcement on November 8, 2016 to cancel the 500 and 1,000 Indian Rupee currency bills to fight illegal money. PRUDHVI and LEELA converted their illegal money into gold items (worth more than 120,000 USD) by working with Gold Jewelry shops using their police connections. Defendant BHOGIREDDY brought the gold items to the US when we traveled back to Chicago from India in December 2016.

69. On December 11, 2016, I came back to the US (Chicago) from India along with Defendant BHOGIREDDY and our baby (SB), just for the sake of the baby, and on December 14, 2016, we were back to our own apartment in Chicago.

C. Domestic Violence and False Police Report Filed Against Me

70. On December 14, 2016, I found a sex video of Defendant BHOGIREDDY with a woman and I got upset and called Defendant BHOGIREDDY at his work. Our conversation continued in the form of text messages. During that exchange, I clearly told him that I

lost trust in him and wanted to leave him. I told him that he could have the 10 lakhs cash (1,000,000 Indian rupees I gave to LEELA) and the gold jewelry given by my parents and in return, I asked him to send me and my son back to India. Understanding the scam I got trapped in, and as I could not trust Defendant BHOGIREDDY and his family, I saved the text messages in my email in the form of screenshots of the text messages from my cell phone.

71. On December 14, 2016 night, as a counter attack to my questioning about his affairs, Defendant BHOGIREDDY threatened me that he could fabricate affairs for me and it

* * *

APPENDIX L

of 1,000 USD per month as per the court order as of September 11, 2018. The truth is that he was paying 1,597 USD (rounded to 1,600 USD) per month as per the modified court order as of January 14, 2020 (**as mentioned in the Paragraph #141 above**) and he was the one who requested the court to modify the previous court order (as of September 11, 2018) in January 2020.

(iii) Defendant BHOGIREDDY along with his attorney, Defendant BUZINSKI made the false statements to the court to fraudulently understate the amount for Child Support in order to manipulate the court to either reduce the child support amount further (from 1,000 instead of 1,597 USD) or cancel it temporarily.

(iv) I reported the above fraud by Defendant BHOGIREDDY and his attorney, Defendant BUZINSKI and other serious fraud and crime by judges, lawyers and court appointed experts committed during the proceedings of the case to the court by filing my 'Objection and Response to the Motion to Modify and Abate Child Support' on December 9, 2020.

(v) Based on the bank statements provided, Defendant BHOGIREDDY had a substantial amount of money in the form of unemployment benefits and third-party deposits with an average total monthly deposit of **\$12,965** for the last 12 months (as of March 2021). He chose to pay only \$800 per month and sometimes \$1,100 per month. without following the court order as of January 14, 2020. There were pending arrears of child support in the amount of **\$6,668.50** as of May 19, 2021. For example, for the

Year 2020, there was a total account balance of **\$168,327.66** with **\$54,565** from job/unemployment benefits and **\$113,762.66** from other deposits in his 'Bank of America' account. I have reported the same to the court accordingly. The bank statements also show the third-party deposits. For example, **an individual 'Venkat My-nampati'** made deposits in a total amount of **\$92,500** between 2016 and 2020, in various transactions. And, there are no transactions to indicate that Defendant BHOGIREDDY paid this money back to that individual. These are the deposits in US dollars by individuals in the US for whom the corresponding money converted into Indian Rupees (not reported for taxation in India) is paid back to their families in India, by Defendant BHOGIREDDY's parents in India. **That is how, Defendant BHOGIREDDY is able to bring untaxed money from India without paying taxes in the US and in India.** There were also deposits from a hidden account with name **'CA TLR Transfer'** in a total amount of **\$96,000** during the above time period. At the same time, Defendant BHOGIREDDY was leading a lavish lifestyle and paying all his other obligations for personal spending, fees for multiple high-power attorneys without any problem. **As explained above, Defendant BHOGIREDDY influenced people with power through bribes, which could run to millions of dollars using illegal money from India, to cover up his criminal actions from getting reported to the courts.**

65a

(i) **According to 735 ILCS 5/109:**

“Any person who makes a false statement, material to the issue or point in question, which he does not believe to be true, in any pleading, affidavit or other

* * *

APPENDIX M

Constitution, without ‘Due Process of Law’, under ‘Color of Law’, in violation of the 18 U.S.C. § 242.

VII. PRAYER FOR RELIEF

WHEREFORE, I, the Plaintiff Usha Soujanya Karri, pray the Honorable Court for the following relief:

- A. A declaration that my civil rights as protected by Fourteenth Amendment of the US Constitution, have been violated by Chicago Police Officers, Defendants WALKER, YU. HARACZ, WYPYCH, BOYLE, FIFE, BONZA, BUZINSKI and BHOGIREDDY, under Color of State Law.
- B. To enter an order for Declaratory relief, which includes
 - 1. A preliminary and permanent injunctive relief by ordering Defendant GARLAND to stop and address the serious fraud and crime including bribery using illegal money from India and, 2 conspiracies to get me murdered and coverup of the crime (including the coverup by Federal Prosecutors from US Attorney’s Office in Chicago with the help of Federal Judge Andrea Wood), committed under Color of Law. in order to safeguard the public trust and respect in this Federal Court and State Court Systems, Law Enforcement and ‘Rule of Law’, by ordering for a federal investigation.

2. A preliminary and permanent injunctive relief by ordering Defendant GARLAND to disclose to this Honorable Court the information collected by a separate team of federal agents from ATF regarding the plans by Defendant BHOGIREDDY to get me murdered.
3. A preliminary and permanent injunctive relief by ordering Defendant BROWN to complete the investigation on all Domestic Violence criminal cases for Battery, Criminal Sexual Assaults and Theft of my personal property. against Defendant BHOGIREDDY as covered up by Chicago Police and also on the 2 conspiracies to get me murdered and, file the charges accordingly.
4. A preliminary and permanent injunctive relief by ordering Cook County Domestic Relations Court to schedule the trial to a date until after the investigation by Defendant GARLAND is complete, to ensure a fair trial in the case in the Cook County Domestic Relations Court.
5. A preliminary and permanent injunctive relief by prohibiting the Cook County Domestic Relations court from any further violation of my civil rights.
6. A preliminary and permanent injunctive relief by prohibiting all Defendants and any persons or entities or agencies related to the Defendants, from any retaliatory actions against me and my family members.

- C. Order Defendants BOYLE and FIFE to pay the damages for emotional distress, physical pain and suffering, loss of my personal property, loss of money in the form of legal fees and costs and loss of money in the form of potential damages due to fraud committed in the civil lawsuit for Domestic Violence, they inflicted against me and, punitive damages, as determined by the Jury.
- D. Order Defendant BUZINSKI to pay the damages for emotional distress, physical pain and suffering, loss of my personal property, loss of money in terms of legal costs, child support and its pending arrears and loss of money in the form of potential damages due to fraud committed in the civil lawsuit for Domestic Violence, she inflicted against me and, punitive damages, as determined by the Jury.
- E. Order Defendant BHOGIREDDY to pay the damages for emotional distress, physical pain and suffering, loss of my personal property, loss of money in the form of lost wages, legal fees and costs, child support and its pending arrears, loss of money due to COVID-19 stimulus checks from Federal Government received by Defendant BHOGIREDDY and loss of money in the form of potential damages due to fraud committed in the civil lawsuit for Domestic Violence, he inflicted against me and, punitive damages, as determined by the Jury.
- F. Order Defendant BONZA to pay the damages for serious fraud, intimidation, emotional

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distress and suffering she inflicted against me and, punitive damages, as determined by the Jury.

- G. For such other relief as the Honorable Court deems just and appropriate under the circumstances.

Dated: April 27, 2022

Respectfully Submitted,

Usha Soujanya Karri

By: /s/ Usha Soujanya Karri

APPENDIX N**Request Appointment****MY BACKGROUND**

I am a licensed clinical psychologist and the founder of Zeal Family Wellness, LLC. I hold a Doctoral degree of Clinical Forensic Psychology with a law enforcement concentration from The Chicago School of Professional Psychology, a Bachelor degree from University of Michigan Dearborn, and an Associate degree of Criminal Justice.

I provide individual and family counseling services to adults, children, and adolescents who are seeking to build healthy relationships and authentic lives. I also work with couples and co-parents who are experiencing communication problems. My areas of specialization include life transitions with an emphasis on divorce and separation, relationship conflict, and childhood trauma. I typically help people overcome feelings of shame, sadness, self-doubt, denial, powerlessness, hopelessness, fear, anxiety, grief, or anger.

Some of my work is with individuals and families involved in the criminal and family court systems. I have ten years of experience providing court mandated psychological evaluations, co-parent counseling, supervised and therapeutic supervised visitation, domestic violence counseling, anger management counseling, and parent-child reunification services. The evaluations I have conducted include psychological assessments, parenting capacity evaluations, competency

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evaluations, and sex offender evaluations. I am currently accepting referrals for evaluations, including 604b evaluations, on a case-by-case basis.

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APPENDIX O

CHICAGO POLICE DEPARTMENT

RD #: HZ552966

ORIGINAL CASE

EVENT #: 1635010855

INCIDENT REPORT

Case ID: 10787345

3510 S. Michigan Avenue,

CASR229

Chicago, Illinois 60653

(For use by Chicago Police

Department Personnel Only)

CPO-11.388(6/03)-C)

INCIDENT	ASSIGNED TO ADMINISTRATIVE PERSONNEL	
	IUCR: 0486 - Battery - Domestic Battery Simple	
	Occurrence	Beat: 1225
	Unit Assigned: 1202	
	RO Arrival Date: 15 December 2016 18:40	
	1026 W Harrison St, #1815	
	Location: Chicago IL 290 - Residence	
	Occurrence Date: 14 December 2016 20:30	
	Domestic Related Incident# Offenders: 1	

NON OFFENDER	CHILD AT RISK	
	Name: [REDACTED]	Demographics
	Beat: 5100	Male Age: 1 Years
	VICTIM - Individual	
	Name: BHOGIREDDY, Venkatesh	Demographics
	Res: 1926 W Harrison St #1815 Chicago IL	Male Asian/Pacific Islander DOB: [REDACTED] Age: [REDACTED] DLN: [REDACTED] 245 - IL
	Beat: 5100	
	Sobriety: Sober	

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	Other Communications and Availability
	Cellular Phone: 773-612-4567

INJURIES	Injury Info ([REDACTED] - Child At Risk)
	Responding Unit:
	Injury Info (BHOGIREDDY, Venkatesh - Victim)
	Injured by offender Responding Unit:

SUSPECTS	Suspect # 1	
	Name: KARRI, Usha	Demographics
	Res: 1926 W Harrison St	Female
	Beat: 1225	Asian/ Pacific Islander
	#1815	DOB: [REDACTED]
	Chicago IL	Age: [REDACTED] years
	Other Communications and Availability	
	Cellular Phone: 773-612-4567	
	Injury Info	
	Responding Unit:	

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RELATIONSHIP	RELATIONSHIP
	(Victim) BHOGIREDDY, Vankatesh (Offender) is a Victim Was Offender of KARRI, Usha

DOMESTIC INFO	Order of Protection Info	
	Order of Protection #: - IL	
	Procedure Notifications	
	Children Present: 1	
	Transportation arranged/Provided to Relocate? Declined	
	Victim Advised of Hotline: Yes	
	#?	
	Domestic Info Notice Provided?	Yes
	Victim Advised of OOP Procedures?	Yes
	Victim Advised of Warrant Procedures?	Yes

OTHER	Miscellaneous
	Victim Information Provided Flash Message Sent: No

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NARRATIVE	<p>IN SUMMARY: VENKATESH BHOGIREDDY (VICTIM AND COMPLAINANT) RELATED HE HAD A VERBAL ALTERCATION WHICH BECAME PHYSICAL WHEN USHA KARRI(OFFENDER) GRABBED HIM BY THE EARS CAUSING MINOR SCRATCHES BEHIND HIS EARS. VENKATESH BHOGIREDDY (VICTIM AND COMPLAINANT) FURTHER RELATED HE PUSHED HER OFF HIM IN ORDER TO GET AWAY FROM OFFENDER. R/O ADVISE WARRANT AND ORDER OF PROTECTION. DOMESTIC NOTICED GIVEN</p>
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PERSONNEL	Star No Emp No Name			
	Approving Supervisor	2577	#37756	MEDINA, Victor, M.
	Reporting Officer	11009	#13893	ENG, Marvin
	User	Date	Unit	Beat
	(PCOT312)	18 Dec 2016 20:35	C12	
	(PCOU778)	15 Dec 2016 19:06	C24	1202

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APPENDIX P

CHICAGO POLICE DEPARTMENT **RD #:** JB248086
ORIGINAL CASE **EVENT #:** 1812305113
INCIDENT REPORT Case ID: 11303546
 3510 S. Michigan Avenue, CASR229
 Chicago, Illinois 60653
 (For use by Chicago Police
 Department Personnel Only)
 CPO-11.388(6/03)-C)

INCIDENT	ASSIGNED TO FIELD	
	IUCR: 0560 - Assault - Simple	
	Occurrence	Beat: 1221 Unit Assigned: 1233
	1926 W Hubbard St, #1815	RO Arrival Date: 03 May 2018 10:50
	Location: Chicago IL 60612 290 - Residence	Domestic Related In- cident# Offenders: 1
	Occurrence Date: 03 May 2018 06:00 - 03 May 2018 08:00	

NON OFFENDER	VICTIM - Individual	
	Name: [REDACTED]	Demographics
	Res:	Male
	Beat: 1221	Asian/Pacific Islander
	1926 W Hubbard St #1815 Chicago IL 60612	DOB: [REDACTED]
	Beat: 5100	Age: 2 Years
	Sobriety: Sober	Birth Place: Illinois
	VICTIM - Individual	
	Name: [REDACTED]	Demographics Juvenile

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	Res: 1926 W Hubbard St #1815 Chicago IL 60612 773 - 999 - 8249 Beat: 1221 Sobriety: Sober	Male Asian/Pacific Islander DOB: [REDACTED] Age: 0 Years Birth Place: Illinois
	VICTIM - Individual	
	Name: KARRI, Usha S Res: 1926 W Hubbard St #1815 Chicago IL 60612 773 - 999 - 8249 Beat: 1221 Sobriety: Sober	Demographics Juvenile Female Asian/Pacific Islander Black Hair Bun Hair Style Medium Complexion DOB: [REDACTED] Age: [REDACTED] Years

INJURIES	Injury Info ([REDACTED] - Victim)
	Responding Unit:
	Injury Info ([REDACTED] - Victim)
	Responding Unit:
	Injury Info (KARRI, Usha S - Victim)
	Responding Unit:

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SUSPECTS	Suspect # 1	
	Name: BHOGIREDDY, Vankatesh Res: 1926 W Hubbard St #1815 Chicago IL 60612 Beat: 1221	Demographics Male Asian/ Pacific Islander 6'02, 221 lbs Brown Eyes Medium Complexion DOB: [REDACTED] Age: [REDACTED] years DLN: [REDACTED] 45 - IL

SUSPECTS	Injury Info
	Responding Unit: <div style="background-color: #cccccc; height: 40px; width: 100%;"></div>

RELATIONSHIP	RELATIONSHIP	
	(Victim) [REDACTED]	(Offender) BHOGIREDDY, Venkatesh
	is a Son of	
	(Victim) [REDACTED]	(Offender) BHOGIREDDY, Venkatesh
	is a Son of	
(Victim) KARRI, Usha,S	(Offender) BHOGIREDDY, Venkatesh	
is a Wife of		

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DOMESTIC INFO	Order of Protection Info		
	Order of Protection #: - IL		
	Procedure Notifications		
	Past Abuses: 5		
	Transportation arranged/Provided to Relocate? Yes		
	Victim Advised of Hotline: Yes		
OTHER	#?		
	Domestic Info Notice Provided?		Yes
	Victim Advised of OOP Procedures?		Yes
	Victim Advised of Warrant Procedures?		Yes

OTHER	Miscellaneous		
	Victim Information Provided		
	Flash Message Sent: No		

NOTIFICATIONS	Request Type	Date	Name
	Notification	03 May 2018 11:30	Lisa

NARRATIVE	<p>EVENT#015113 IN SUMMARY, R\O'S RESPONDED TO A DOMESTIC DISTURBANCE AT 1916 W. HARRISON ST. UPON ARRIVAL, USHA KARRI (VICTIM AND COMPLAINANT) STATES TO R\O'S THAT VENKATESH BHOGIREDDY(OFFENDER) HAS VERBALLY THREATENED HER MULTIPLE TIMES SAYING HE IS GOING TO BEAT HER, CUT HER, AND CHOP HER UP INTO PIECES. USHA KARRI (VICTIM AND COMPLAINANT) ALSO STATED THAT VENKATESH BHOGIREDDY(OFFENDER) HAS PHYSICALLY ABUSED HER IN THE PAST SEVERAL TIMES, LAST PHYSICAL OCCURRENCE HAPPENED ON JUNE OF 2017. USHA KARRI (VICTIM AND COMPLAINANT) ALSO STATED THAT VENKATESH BHOGIREDDY(OFFENDER) IS A POWERFUL AND WEALTHY MAN IN INDIA AND HAS MADE LIFE THREATS TO KILL HER FAMILY IN INDIA, USHA KARRI (VICTIM AND COMPLAINANT) IS IN FEAR OF HER SAFETY AND WANTED TO BE RELOCATED. R\O'S CONTACTED 24HR HOTLINE AND MADE ARRANGEMENTS TO RELOCATE HER. R\O'S PROVIDED USHA KARRI (VICTIM AND COMPLAINANT) WITH VICTIM INFORMATION NOTICE AND DOMESTIC INFORMATION NOTICE.</p> <p>- STAR#: 6067 NAME: JUAN GONZALEZ BEAT: 1233</p> <p>- STAR#: 6448 NAME: JESSE SANTILLAN BEAT: 1233</p>
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PERSONNEL		Star No	Emp No	Name		
	Approving Supervisor	1066	#37486	O CONNOR, John, P.		
	Detective/ Investigator	20583	#102687	MCCRILLIS, James, B.		
	Reporting Officer	6448	#121817	SANTILLAN, Jesse,		
	Reporting Officer	6067	#20367	GONZALEZ, Juan, I		
	User	Date		Unit	Beat	
	(PC0T119)	03 May 2018 13:47		012		
	(PC0Z065)	04 May 2018 10:16		610		
	(PC0BQ82)	03 May 2018 12:57		022	1233	
	(PC0U303)	03 May 2018 12:57		012	1233	

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CHICAGO POLICE DEPARTMENT

RD #: JB337844

ORIGINAL CASE

EVENT #: 1818708105

INCIDENT REPORT

Case ID: 11371322

3510 S. Michigan Avenue,

Chicago, Illinois 60653

(For use by Chicago Police

Department Personnel Only)

CPO-11.388(6/03)-C)

INCIDENT	ASSIGNED TO FIELD	
	IUCR: 0281 - Crim Sexual Assault - Non-Aggravated	
	Occurrence Beat: 1225 1926 W Harrison St, #1815 Location: Chicago IL 60612 290 - Residence	Unit Assigned: 0202 RO Arrival Date: 06 July 2018 12:15 Domestic Related Incident # Offenders: 1
	Occurrence Date: 27 January 2017 00:15 - 26 March 2017 23:30	

NON OFFENDER	CHILD AT RISK	
	Name: [REDACTED] Beat: 5100	Demographics Male Age: 3 Years
	VICTIM - Individual	
	Name: KARRI, Usha S Res: Beat: 1225 1926 W Harrison St #1815 Chicago IL 60612 Beat: 5100 Sobriety: Sober	Demographics Female Unknown 5'09, 176 lbs Brown Eyes Black Hair Pony Tail Hair

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	Style Light Complexion DOB: [REDACTED] Age: [REDACTED] Years Identification: Type State Other Id Number C65446813
	Other Communications and Availability
	Other: 773-375-8400

INJURIES	Injury Info ([REDACTED] - Child At Risk)
	Responding Unit:
	Injury Info (KARRI,Usha S - Victim)
	Injured by offender Responding Unit:

SUSPECTS	Suspect # 1	
	Name: BHOGIREDDY, Venkatesh Res: 1926 W Harrison St #1815 Chicago IL Beat: 1225	Demographics Male Asian/ Pacific Islander 6'02, 221 lbs Brown Eyes Black Hair Short Hair Style Medium Complexion DOB: [REDACTED]

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		Age: 40 years
	Other Communications and Availability	
	Injury Info	
Responding		

SUSPECTS	Unit:

RELATION-	RELATIONSHIP
	(Victim) (Offender) KARRI, Usha,S is a Husband of BHOGIREDDY, Venkatesh

DOMESTIC INFO	Order of Protection Info
	Order of Protection #: - IL
	Procedure Notifications
	Past Abuses: 1 Past Case Reports: 1
	Children Present? 1
	Transportation Arranged/Provided to Relocate? Decl ined
Victim Advised of Hotline: Yes	
#?	
Domestic Info Notice Provided?	Yes

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	Victim Advised of OOP Procedures? Yes
	Victim Advised of Warrant Procedures? Yes

OTHER	Miscellaneous
	Victim Information Provided Flash Message Sent ? No

NARRATIVE	IN SUMMARY:USHA KARI (VICTIM AND COM- PLAINANT) RELATED TO R/O THAT HER HUS- BAND VENKATESH BHOGIREDDY(OFFENDER) HAS ON SEVERAL OCCATIONS FORCED HER TO HAVE SEX WITH HIM AND ALSO TRIED TO FORCE HER TO TAKE OVUALUTION TABLETS IN AN ATTEMPT TO IMPREGNATE VICTIM WHICH VICTIM REFUSED TO TAKE, AT ONE POINT OFFENDER HELD VICTIM BY HER FACE AND FORCED A PILL INTO HER MOUTH. OFFENDER CONTINUED TO ABUSE VICTIM BOTH PHYSICALLY AND MENTALLY BY STRIKING HER WITH HIS HANDS AND THREATING TO KILL HER. VICTIM HAS SINCE MOVED OUT AND STAYING IN A SHEL- TER AND HAS OBTAINED AN ORDER OF PRO- TECTION. UNDER CASE# 18OP73493. VICTIM #1 HAS ALSO ACCUSED OFFENDER OF MAK- ING THEIR SON [REDACTED] BHOGIREDDY WATCH PORN WITH HIM. AREA CENTRAL NOTIFIED SGT RONEY#2244 BEAT#5130. PREVIOUS RD#: JB248086
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PERSONNEL		Star No	Emp No	Name		
	Approving Supervisor	2670	#54404	WILLIAMS, Troy, V.		
	Detective/ Investigator	20816	#100631	TRUESDALE, Samuel, K.		
	Detective/ Investigator	20583	#102687	MCCRILLIS, James, B		
	Reporting Officer	3719	#46726	NORMAN, David		
	User	Date		Unit	Beat	
	(PC0J879)	06 Jul 2018 14:58		002		
	(PC0Y673)	16 Jul 2018 15:09		610		
	(PC0Z065)	07 Jul 2018 12:18		610		
	(PC0H486)	06 Jul 2018 13:18		002	0202	

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CHICAGO POLICE DEPARTMENT
ORIGINAL CASE
INCIDENT REPORT
 3510 S. Michigan Avenue,
 Chicago, Illinois 60653
 (For use by Chicago Police
 Department Personnel Only)
 CPO-11.388(6/03)-C)

RD #: JB337916
EVENT #: 1818708875
Case ID: 11371321
 CASR229

INCIDENT	ASSIGNED TO ADMINISTRATIVE PERSONNEL	
	IUCR: 4387 - Other Offense - Violate Order Of Protection	
	Occurrence Beat: 1225 1026 W Harrison St, #1815 Location: Chicago IL 290 - Residence Occurrence Date: 27 June 2018 10:30	Unit Assigned: 0220 RO Arrival Date: 06 July 2018 12:15 Domestic Related Incident # Offenders: 1

NON OFFENDER	VICTIM - Individual	
	Name: KHARRI, Usha S Res: Beat: 1225 1926 W Harrison St #1815 Chicago IL Beat: 5100 Sobriety: Sober	Demographics Female 5'08, 176 lbs Brown Eyes Black Hair Pony Tail Hair Style Medium Complexion DOB: [REDACTED] Age: [REDACTED] Years Identification:

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		Type Other Id Number 065446813
	Other Communications and Availability	
	Other: 773-375-8400	

INJURIES	Injury Info (KARRI,Usha S - Victim)
	Responding Unit:

SUSPECTS	Suspect # 1	
	Name: BHOGIREDDY, Venkatesh	Demographics
	Res: 1926 W Harrison St #1815 Chicago IL	Male
	Beat: 1225	221 lbs
		Brown Eyes
		Black Hair
		Short Hair Style
	Medium Complexion	
	DOB: [REDACTED]	
	Age: [REDACTED] years	
	Other Communications and Availability	
	Injury Info	
	Responding Unit:	

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RELATIONSHIP	RELATIONSHIP	
	(Victim)	(Offender)
	KARRI, Usha, S	BHOGIREDDY, Venkatesh
	is a Husband of	
RELATIONSHIP	(Victim)	(Offender)
	KARRI, Usha, S	BHOGIREDDY, Venkatesh
	is a Petitioner of	

DOMESTIC INFO	Order of Protection Info	
	Order of Protection #: 18op73493 - IL	
	Expires:	20-SEP-18
	Respondent:	KARRI, Usha - (Non Offender)
	Petitioner:	BHOGIREDDY, Vankatest - (Suspect)
	Procedure Notifications	
	Transportation Arranged/Provided to Relocate? Decl ined	
	Victim Advised of Hotline: Yes #?	
	OOP Notice Served?	Yes
	OOP Notice Verified?	Open Court
Domestic Info Notice Provided?	Yes	
Victim Advised of Warrant Procedures?	Yes	

OTHER	Miscellaneous
	Victim Information Provided Flash Message Sent ? No

OTHER PROPERTIES	Property #1	Possessor/User	KARRI, Usha S
	Type:	Other	Used as Weapon? No
	Description:	Misc. Item	Taken/Stolen? Yes
	Owner:	Usha Karri	Recovered? No
			Damaged? No

NARRATIVE	IN SUMMARY: USHA KARRI (VICTIM AND COMPLAINANT) RELATED TO R/O THAT PER LISTED ORDER OF PROTECTION VEN-KATESH BHOGIREDDY(OFFENDER) CAN NOT REMOVE OR TAKE ANY OF USHA KARRI (VICTIM AND COMPLAINANT) PERSONAL BELONGINGS. VICTIM STATED THAT WHEN SHE WENT BY ALONG WITH THE POLICE TO RETRIVE HER BELONGING VARIOUS ITEMS WERE MISSING TAKEN BY OFFENDER.

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PERSONNEL	Star No Emp No Name			
	Approving Supervisor	2670	#54404	WILLIAMS, Troy, V
	Reporting Officer	3719	#46726	NORMAN, David
	User	Date		Unit Beat
	(PC0J879)	06 Jul 2018 14:57		002
	(PC0H486)	06 Jul 2018 13:38		002 0220

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APPENDIX Q

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT – DOMESTIC RELATIONS DIVISION

42481

In Re: The Marriage of)
Venkatesh Bhogiredy,)
Petitioner,)
And,)
Usha S. Karri,)
Respondent.)

Case No. 18 OP 73493
consolidated with
18 D 6785

~~AGREED ORDER~~

This matter coming on to be heard by agreement of parties, and the Court being fully advised, *on Venkatesh's Emergency Motion for unsupervised Parenting Time*

^ and over Usha's counsel vehement objection,

IT IS HEREBY ORDERED: Usha's attorney having filed a Motion to Withdraw, brought to the attention of the court the videos tendered by Venkatesh's counsel, the boy, 10, and the allegations of domestic violence raised throughout this case; Usha not appearing, the court finding

1. Venkatesh shall have parenting time effective upon entry of this Order, *it to be an emergency* every Saturday and Sunday from 9:00 a.m. to 6:00 p.m. For the first two (2) weeks, the supervisor/nanny shall continue to be present at all times and to follow the directions provided in the Affidavit previously herein. Thereafter, said supervisor/nanny shall only need to be present at the transitions of the children between the parties.

2. Venkatesh shall be primarily responsible for the children's care during all of his parenting time.
3. Both parties shall immediately engage in individual therapy as the therapist directs. Both therapists shall receive a copy of the evaluation prepared by Dr. Kerry Smith. Both parties shall execute releases allowing Lynn Wypych to speak with their therapist.
4. Both parties shall sign up for Our Family Wizard within the next seven (7) days. Both parties shall communicate using Our Family Wizard in all respects related to the children, including but not limited to appointments for the children and illness or diagnosis' for the children.

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5. Both parties shall attend a more in-depth parent education program as approved by the Guardian ad Litem.

6. The minor child, [REDACTED] shall be enrolled in one-on-one speech therapy with Clubhouse Therapy at Venkatesh's sole cost. Both parties shall fully cooperate with the therapist.

7. [REDACTED] shall attend the St. John EV Lutheran School for Pre-K at Venkatesh's sole cost.

8. ~~Venkatesh's Emergency Motion is withdrawn without prejudice.~~ Usha shall have twenty-right (28) days to respond to the Petition to Modify and Motion to Compel Job Diary.

9. ~~The hearing set for August 2, 2019 is hereby stricken.~~

10. This matter is continued ~~for status and presentation of Boyle and Penberg's Motion to Withdraw as Counsel for USHA)~~ ^{for status} to September 8/12, 2019 at 10:00 a.m. for ^{Status Hearing} on Venkatesh's Petition to Modify and Motion to Compel Job Diary and ~~for Status on~~ parenting issues.

Judge Debra B. Walker

ENTERED:

JUL 25 2019

JUDGE

Circuit Court – 2010

Rosenberg Wypych LLC
Guardian ad Litem
3601 Algonquin Rd., Suite 801
Rolling Meadows, IL 60008
(847) 758-1800
admin@rwlawllc.com
Atty. No. 42481

11/28/21, 2:34 PM

Gmail – Court Today

[LOGO] Gmail

Karri Soujanya
<soujkarri11@gmail.com>

Court Today
1 message

Arin Fife <Arin@bfsfamlaw.com> Thu, Jul 25, 2019
at 1:25 PM

To: Karri Soujanya <soujkarri11@gmail.com>
Cc: "Janet E. Boyle" <Janet@bfsfamlaw.com>,
Lori Goelz <lori@bfsfamlaw.com>

Usha,

As you were aware, your husband's attorney proceeded with their Emergency Motion today. I was surprised that you were not present. As I told you I would do, I asked the Judge to grant our Motion to Withdraw. The Judge did not grant our Motion today as you were not present to express your agreement and she stated she believed that you were manipulating the Court by attempting to postpone any issues regarding expanded parenting time. After hearing our lengthy arguments during the pretrial and again today the Judge entered the attached order which is essentially the order prepared by Lynn showing the Judge's recommendations at the pretrial. I again brought up today the issues of domestic violence and the videos taken of the children to the Judge. Usha, we are your attorneys until there is an order allowing us to withdraw. I told the Judge that we had a breakdown in our relationship with you and there was a lack of trust. You have previously received Notice that we will be proceeding with our

Motion to Withdraw on August 2, 2019. We will be proceeding with our request that day. You should be in court to allow this to proceed.

Best regards,

Arin R. Fife, Partner
Boyle Feinberg Sharma, P.C.
2 North La Salle Street, Suite 1600
Chicago, Illinois 60602
(312) 376-8860 voice
(312) 291-9336 fax
Arin@BFSfamlaw.com

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IRS CIRCULAR 230 NOTICE: To ensure compliance with requirements imposed by the Internal Revenue Service, we inform you that any US tax advice contained in this communication (or in any attachment) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or

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matter addressed in this communication (or in any attachment).

[LOGO] Bhogireddy_07252019_0103PM.pdf
133K

APPENDIX R

Order

(Rev. 02/24/05) CCG N002

**IN THE CIRCUIT COURT
OF COOK COUNTY, ILLINOIS**

Venkatesh Bhogireddy

v.

Usha Karri

No. 18 D 6785

ORDER

This matter coming on to be heard for status Usha's motion for additional time and Venkatesh's Emergency Verified Petition for Rule, Immediate Turn-over of the Minor Children, and to be awarded temporary possession; be allocated temporary decision making as it pertains to significant decisions and other relief and the Court hearing argument and being fully advised;

It is hereby Ordered:

(1) A rule is entered against Usha Karri and made returnable on 9/13/19 at 10 15 am for her to show cause if any she can, why she should not be held in contempt of Court for her failure to abide by this Court's order of July 25, 2019.

(2) Usha shall ensure the minor child S.B. timely attends pre-K at Saint John EV Lutheran school beginning 9/4/19. Transportation to and from said school shall be provided by Usha except as set forth hereinbelow.

(3) Venkatesh shall pick up the minor child, S.B. from school on Tuesdays and Wednesdays and take him to and from speech therapy returning the minor child to Usha within 60 minutes of the completion of speech therapy. Venkatesh shall send the minor child through the locked door at usha's apartment building.

(4) Usha shall sign up for our Family Wizard within 24 hours.

(5) Usha shall comply with all terms and provisions of the 7/25/19 order.

(6) This matter is continued to 9/13/19 at 10 15 am for hearing on the rule and compliance.

(7) Ms. Karri is granted an additional 10 days to obtain new council. DBW

Attorney No.: 42481
Name: Lynn Wypych
Atty. for: GAL
Address: 3601 Algonquin Rd. #801
City/State/Zip: Rolling Meadows, IL
Telephone: 847-758-1800

ENTERED:

Dated: Judge Debra B. Walker
SEP 3 2019
Circuit Court – 2010

/s/ Debra B. Walker
Judge

APPENDIX S

Attorney No. 91797

IN THE CIRCUIT COURT
OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT,
DOMESTIC RELATIONS DIVISION

IN RE THE MARRIAGE OF)	
VENKATESH BHOGIREDDY,)	
Petitioner,)	
and)	No. 18D 6785
USHA SOUJANYA KARRI,)	
Respondent.)	

ORDER – ELECTRONICALLY SUBMITTED

The Petitioner, VENKATESH BHOGIREDDY (“VENKATESH”) having filed an Emergency Verified Petition for Temporary Allocation of Parenting Time and Set Parenting Schedule (“Emergency Petition”), the Respondent, USHA SOUJANYA (“USHA”) and the Guardian Ad Litem having been served with the Emergency Verified Petition and General Orders Nos. 2020 D 3 and 2020 D 19 on May 14, 2020 at 4:10 p.m., neither the Guardian ad Litem nor USHA having filed an Answer or Objection, the Court having reviewed the Emergency Petition, having jurisdiction and otherwise being duly advised hereby grants the Emergency Petition on May 15, 2020 at 4:16 p.m.;

ACCORDINGLY, IT IS HEREBY ORDERED:

1. That the Petitioner, VENKATESH BHOGIREDDY (“VENKATESH”), shall have supervised parenting time every other weekend as follows and subject to the restrictions set forth in Paragraph three (3) of this Order:
 - a. Commencing May 22, 2020, every other Friday from 10:00 a.m. until 7:00 p.m.
 - b. Commencing May 23, 2020, every other Saturday from 10:00 a.m. until 7:00 p.m.
 - c. Commencing May 24, 2020, every other Sunday from 10:00 a.m. until 5:00 p.m.
2. In addition to his alternating parenting time, the Petitioner, VENKATESH BHOGIREDDY, shall have supervised parenting time every week on a date that is consistent with the minor child, _____, speech therapy (Wednesdays) from 1:00 p.m. until 7:00 p.m. Said parenting time is subject to the restrictions set forth in Paragraph three (3) of this Order and may be exercised or effectuated by the supervisor electronically. In the event speech therapy is cancelled or moved from the currently scheduled Wednesday time frame, VENKATESH shall notify USHA via Our Family Wizard immediately. VENKATESH shall keep USHA informed as to the progress and recommendations made by the speech therapist through Our Family Wizard.
3. Any parenting time allocated to VENKATESH shall be supervised and subject to the following restrictions:

101a

- a. Barbara Caseio, Mirta Mendez or Varija Bhogireddy shall supervise said parenting time and shall always monitor VENKATESH during the visits.
- b. VENKATESH shall be allowed to pick up the minor child/children from school (if and when school is in session) on Fridays or the weekly speech therapy day with the supervisor for the parenting time as set forth in Paragraph two (2) of this Order.
- c. The exchanges for the parenting time shall take place between the supervisor and USHA in the lobby of USHA's building or a police station near USHA's residence.
- d. VENKATESH shall not be present and shall remain at least 500 feet away from USHA's building and/or the inside of the police station during the exchange.
- e. USHA shall remain in her building or the police station fifteen minutes before and after the exchange to avoid any unintentional contact. USHA shall not be present at the minor child/children's school at least fifteen minutes before or after the end of school on any day VENKATESH has parenting time to avoid any unintentional contact.
- f. The supervisors shall not facilitate contact between the children and VENKATESH which violates any restrictions placed upon his parenting time imposed by this Order or Orders of the Courts. Failure to abide by the terms and provisions of this Paragraph may be

grounds to revoke or modify the parenting time.

4. VENKATESH shall also have supervised parenting time on June 9, 2020 (which is the eldest child's birthday) from 10:00 a.m. until 5:00 p.m. Said parenting time is subject to the restrictions set forth in Paragraph three (3) of this Order.
5. Both parties shall immediately enroll in our family wizard. Our Family Wizard shall be the exclusive method of communication between the parties as it relates solely to the children. Each parent shall maintain their Our Family Wizard account until further Order of Court. The parties shall grant professional access to VENKATESH's probation/parole officer so that he/she may monitor all communications between the parties.

ENTERED: May 18, 2020

s/ Debra B. Walker #2010
JUDGE

Jami M. Buzinski
Davis Friedman, LLP
Attorney for Petitioner
135 South LaSalle Street, 36th Floor
Chicago, Illinois 60603
(312) 782-2220
service@davisfriedman.dcom

APPENDIX T
UNITED STATES DISTRICT COURT
FOR THE Northern District of Illinois –
CM/ECF LIVE, Ver 6.3.2
Eastern Division

UNITED STATES
OF AMERICA

Plaintiff,

v.

Venkatesh Bhogireddy

Defendant.

Case No.:

1:19-cr-00769

Honorable

Andrea R. Wood

/

NOTIFICATION OF DOCKET ENTRY

This docket entry was made by the Clerk on Wednesday, May 20, 2020:

MINUTE entry before the Honorable Andrea R. Wood as to Venkatesh Bhogireddy: Defendant Bhogireddy's motion to modify bond conditions [58] is denied with respect to the request to travel to Chicago on 5/21/2020. The Court defers ruling on the request to modify his conditions of release to allow him to relocate to Chicago until such time as a hearing may be held. By way of explanation, the Court first notes that Defendant filed his motion midday on Tuesday, 5/19/2020, seeking permission to travel to Chicago two days later on Thursday, 5/21/2020. Although the motion was not styled as an "emergency," the timing makes clear Defendant's intent to force a quick resolution. The Court surmises that Defendant was hopeful that once in

Chicago he would have leverage, particularly in light of the ongoing Covid-19 public-health emergency, to convince the Court to allow him to relocate to Chicago permanently. But Defendant's motion presents no reason why he must be in Chicago on Thursday, other than his own "emergency" request to the Domestic Relations court that he be permitted regular visitation with his children starting Friday. The visitation order was apparently issued on 5/15/2020 after being served on the respondent in that proceeding on 5/14/2020. The visitation order appears to set a regular parenting and visitation schedule that contemplates Defendant being in Chicago to carry out various parenting tasks on a weekly basis. The visitation order does not, however, reveal the nature of the claimed "emergency" that necessitated its issuance on short notice or otherwise reveal the basis upon which Defendant made the request. The visitation order also contains no acknowledgement that Defendant is currently required to reside in California pursuant to this Court's bond order (leading this Court to question whether that circumstance was raised to the state court and, if so, how it was explained). Since the petition to the Domestic Relations court was initiated by Defendant, it is also unclear why Defendant waited until two days before his intended travel to let this Court know of his request. In the past, this Court has freely granted Defendant's requests to travel to Chicago to visit with his children but always with the understanding that he would be traveling back to California upon the conclusion of his visit. With the instant request, however, the Court is concerned by the manner in which it has been made.

Moreover, this is not the first (or even the second) time that Defendant has asked this Court to revisit the condition, originally set by the Magistrate Judge, requiring Defendant to reside with his third – party custodian in California. Yet Defendant’s motion does not address the main reason why first the Magistrate Judge and then this District Judge have seen fit to require Defendant to reside out of state – namely, the risk of danger to third persons, most significantly, Individual A. While this Court acknowledges the state court’s decision to facilitate more regular contact between Defendant and his children, this Court’s concern must extend further to the safety of others and the community and the other specific considerations of the Bail Reform Act. None of those factors are addressed in Defendant’s motion. That said, the Court declines to deny the request to relocate outright at this time. Rather, the Court believes that the issues raised in the motion are best addressed with the benefit of a hearing. And so the Court defers ruling on the relocation request until such time as a hearing may be held. The Court will contact the parties to schedule such a hearing, which may be held telephonically, as soon as practicable. However, Defendant should keep in mind (1) most non – emergency court proceedings have been delayed due to the Covid – 19 public – health emergency, and (2) the Court does not view Defendant’s latest of multiple requests to revisit his living arrangements to present an emergency, at least not based on the circumstances presented in the current motion. If there is some emergency that requires Defendant to be in Chicago on Thursday, Defendant’s counsel may explain

it in a renewed or supplemental motion for travel. If it is Defendant's position that the Domestic Relations court has now "ordered" him to be in Chicago pursuant to the visitation order, then Defendant's counsel must explain the basis for that position, including the circumstances under which the visitation order was requested. Mailed notice. (dal,)

ATTENTION: This notice is being sent pursuant to Rule 77(d) of the Federal Rules of Civil Procedure or Rule 49(c) of the Federal Rules of Criminal Procedure. It was generated by CM/ECF, the automated docketing system used to maintain the civil and criminal dockets of this District. If a minute order or other document is enclosed, please refer to it for additional information.

For scheduled events, motion practices, recent opinions and other information, visit our web site at ***www.iind.uscourts.gov***.

APPENDIX U
REQUEST FOR ACTION

To February 16, 2021

The Honorable John R. Lausch, Jr.

The United States Attorney

The United States Attorney's Office

Northern District of Illinois, Eastern Division,

219 S. Dearborn St, 5th Floor Chicago, IL 60604.

CC: Mr. Jason Julien,
Assistant United States Attorney

Reg: **USA v. Bhogireddy – Case# 2019R00722 –**
Continued Retaliation and Concerns
about Relaxing the Release Conditions for
Venkatesh

Dear Mr. Lausch,

I am Usha Karri, one of the victims in the above mentioned federal criminal ('murder-for-hire') case where the defendant 'Venkatesh Bhogireddy' (my ex husband) planned to murder me and my uncle as retaliation for reporting his domestic violence to the Chicago police and to permanently cover up the criminal cases related to the domestic violence, which are still pending with the Chicago Police for the last 2 and half years.

I was notified by your office on Friday, February 12, 2021 to provide a list of possible places that I go to as part of my day to day life so that the court can consider them as part of relaxing/modifying the release conditions for Venkatesh.

I understand that arrest and release conditions/restrictions set by the court in a criminal case are meant to deter the defendant from committing any further crime. However, in case of Venkatesh, there is no effect to that purpose. His actions along with his father Prudhvi's actions show that they are thinking and are so comfortable that they can get away with the crime Venkatesh has been charged for, without any consequences to them and that they can continue to commit criminal actions.

I have very serious concerns about it and I strongly request you to reconsider any recommendations to relax/modify the release conditions for Venkatesh due to the below reasons:

1. Venkatesh Continues to Harass My Parents in India Through His Father 'Prudhvi' as Part of the Retaliation Against Me

Land Grabbing by Using Forgery Documents in Visakhapatnam. A.P., India:

a. Venkatesh's father "Prudhvi" has been constantly working to cripple the lives of my parents in multiple ways at the same and at the right moment.

b. When I filed a motion on June 8, 2020 with all facts of the case including the domestic violence and its cover-up by attorneys and others in Cook County Domestic Relations (Family) court (as I reported to your office on July 16, 2020), as retaliation, on July 23, 2020, Prudhvi had some people grab a land (owned by my parents in Visakhapatnam) using forgery documents

to inflict severe financial loss and emotional distress to them. My parents reported it to the local police accordingly using a complaint letter (Ref: Page 4 of Doc# 201).

Conspiracy to Harass. Kidnap and Murder my Parents in India Using a False Police Report:

c. Upon arrest of Venkatesh by ATF Agents on October 3, 2019, Venkatesh's father "Prudhvi Narayana Bhogireddy" lodged a false police report against my parents and me on October 29, 2019 in his hometown Pedakakani (in Guntur, A.P., India) with the help of his connections with the local police as he was a police officer there before he retired (Ref: Doc# 202).

d. He waited for the right time to execute his conspiracy. On September 23, 2020 (almost 1 year after lodging the above false police report), "Prudhvi" sent a police officer with the above police report from his hometown to my parents home in my hometown (Visakhapatnam, A.P., India), asking my parents to go to the Police Station in his hometown (Pedakakani) clue to the above criminal case filed there.

e. The police report was filed with full of false information in our native language (Telugu) as described in the complaint letter (Ref: Page 8 of Doc# 201) that my parents filed with the Police in our hometown, Visakhapatnam.

f. The purpose of the above false police report was to make my parents go to the hometown of Prudhvi so that he can kidnap and murder them as he has got strong hold and connections in that place.

2. Venkatesh Filed a Motion in the Family Court with False Information to Evade/Reduce the Child Support Fraudulently as Further Retaliation Against Me

It is a crime to make a false statement knowingly in the court:

a. Venkatesh stopped complying with the court order for child support, starting from August 2020 as he started paying only 800 USD instead of the 1,597 (rounded to 1,600) USD of child support as ordered by the court on January 14, 2020.

b. On November 20, 2020, Venkatesh through his attorney Jami Buzinski filed a motion in the Cook County Domestic Relations (Family) Court to modify/abate child support as he stated that he did not have a job (Ref: Doc# 203), even though he has other income in the form of third party deposits in his bank accounts (as I reported to your office along with documents in February 2020).

c. In the motion, he knowingly made false statements, claiming that he was paying a child support of 1,000 USD per month as per the court order as of September 11, 2018. The truth is that he was paying 1,597 USD (rounded to 1,600 USD) per month as per the modified court order as of January 14, 2020 (as mentioned in the Point #a above) and he was the one who requested the court to modify the previous court order (as of September 11, 2018) in January 2020.

d. He made the false statements to the court to fraudulently understate the amount for Child Support

in order to manipulate the court to either reduce the child support amount further (from 1,000 instead of 1,597 USD) or cancel it temporarily.

e. According to According to 735 ILCS 5/1-109:

“Any person who makes a false statement, material to the issue or point in question, which he does not believe to be true, in any pleading, affidavit or other document certified by such person in accordance with this Section shall be guilty of a Class 3 felony”.

f. I filed response to the above motion on December 9, 2020 (Ref: Doc# 204) with all facts about his fraudulent claims and his other income. I also provided the facts about how Venkatesh influenced and bribed the Chicago Police, judges, court appointed experts and my attorneys to rig the legal system in his favor. I requested the court to order for a criminal investigation by FBI, of the crime committed by all people involved in the scandal.

g. I provided the evidence and supporting documents (Ref Doc# 205) accordingly. There is a court hearing scheduled for March 8, 2021 to go over the above motion. With the above facts, as Venkatesh continues to retaliate against me by himself and through his father “Prudhvi Narayana Bhogireddy”, I strongly request you to reconsider any recommendations to relax the release conditions and deny any such request accordingly.

Also, I request you to consider and include the above facts during the proceedings of this criminal case including the trial and any plea deals.

I thank you for reaching out to me and for your kind attention to this request.

List of Documents Attached to this letter:

201. A copy of the police complaint about the harassment by Prudhvi Narayana Bhogireddy, filed by my parents in Visakhapatnam, A.P., India

202. A copy of the false police complaint filed by Prudhvi in Pedakakani, Guntur, A.P., India

203. A copy of the motion filed by Venkatesh in Cook County Domestic Relations Court to modify/abate child support with false information

204. A copy of the Response I filed in the above court for the above motion

205. A copy of the document with evidence (exhibits) supporting my above Response.

Sincerely,

s/ Usha Karri

Usha Karri
4640 N Sheridan Rd, Apt 1004
Chicago, IL 60640
Ph: 708-400-2967.

APPENDIX V

5/23/22, 11:08 AM

Gmail – Bhogireddy

[LOGO] Gmail

Karri Soujanya
<soujkarri11@gmail.com>

Bhogireddy

1 message

Lynn Wypych
<LWypych@rwlawllc.com>

Mon, Jul 12, 2021
at 10:17 AM

To: “Usha Karri (soujkarri11@gmail.com)”
<soujkarri11@gmail.com>, “Jami M. Buzinski”
<jbuzinski@davisfriedman.com>
Cc: Lynn Wypych <plynnw@comcast.net>

Good Morning:

As you know we are up for status on Wednesday in regard to parenting time. I am not recommending parenting time at MCC as I stated before. As to parenting time once Venkatesh is sentenced, I think it's premature to weigh in on that issue until we know where he's going, what the accommodations would be and where the children are developmentally at that point. I am however inclined to recommend Zoom parenting time-at some point- to be supervised in a therapeutic setting. Certainly we can't expect Usha to supervise and facilitate. Additionally I am sure the kids are going to need to process the loss they are experiencing and the reasons behind that and that should happen with a professional.

I have reached out to several professionals, one of whom is available to assess whether she believes it beneficial for the children to have Zoom parenting time or not at this time. Her name is Dr. Stephanie Bonza-Zeal Family Wellness, 1945 W. Wilson, Chicago. The cost would be \$150 per session. She would like to meet-Jspeak with Usha and Venkatesh separately as well as the children. There is no need to respond to this email-I am simply letting you know what I will be suggesting to the Court this week.

Lynn Wypych
Rosenberg Wypych LLC
3601 Algonquin Road, Suite 801
Rolling Meadows, IL 60008
847.758.1800

CONFIDENTIALITY NOTE:

This e-mail and any attachments may contain privileged/confidential information. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of this e-mail or any attachment is prohibited. If you have received this e-mail in error, please notify us immediately by returning it to the sender and deleting this copy from your system. Thank you for your cooperation.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS E-MAIL.

APPENDIX W

**IN THE CIRCUIT COURT
OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT,
DOMESTIC RELATIONS DIVISION**

IN RE THE MARRIAGE OF)	
VENKATESH)	
BHOGIREDDY,)	
)	
Petitioner,)	No. 18 D 6785
and)	
)	
USHA SOUJANYA KARRI,)	
)	
Respondent.)	
)	

**ORDER – SUBMITTED BY
ELECTRONIC MEANS**

THIS MATTER COMING TO BE HEARD for status regarding parenting time/contact with the minor children, the Respondent, the Guardian Ad. Litem, Lynn Wypych appearing and making an oral report to the Court and Petitioner appearing through counsel, the Court having jurisdiction and being duly advised in its premises;

ACCORDINGLY, IT IS HEREBY ORDERED:

1. That Dr. Stephanie Bonza is appointed to assess whether or not it is in the best interests of the children (or either of them) at this time to have Zoom parenting time with Venkatesh while he is incarcerated in Federal Prison.

2. Both parties shall fully cooperate with Dr. Bonza in her assessment. Usha shall make the children available for Dr. Bonza at times as directed by her.
3. The GAL shall release Dr. Kerry Smith's 604.10 (b) evaluation to Dr. Bonza for her review.
4. Venkatesh shall be solely responsible for the expense of Dr. Bonza's assessment. In the event that Usha needs to make the children or herself physically present at Dr. Bonza's office at Dr. Bonza's request, Venkatesh shall reimburse Usha for the cost of public transportation, taxi, Uber or Lyft cost to and from Usha's residence to Dr. Bonza's office for Usha and the children upon presentment of the expense.
5. Venkatesh shall have until August 13, 2021 to respond or otherwise plead to Usha's Motion to Revoke/Cancel Parenting Time/Visitations and Other Relief.
6. This matter is continued for status on Dr. Bonza's assessment on August 13, 2021 at 10 a.m.

ENTERED: 7/15/2021

/s/ William Yu #2221
JUDGE

117a

Davis Friedman, L LP	Usha Kari
135 South LaSalle Street,	4640 N. Sheridan Road,
36th Floor	Unit 1004
Chicago, Illinois 60603	Chicago, Illinois 60640
(312) 782-2220	<u>soujekarri11@</u>
<u>service@davissfriedman.com</u>	<u>gmail.com</u>
Lynn Wypych	
Rosenberg Wypych LLC	
<u>LWypych@rwlawllc.com</u>	

APPENDIX X

Zeal Family Wellness, LLC

Appointments Documents Billing & Payments

Informed Consent for Psychotherapy

contractual agreement. Given this, it is important for us to reach a clear understanding about how our relationship will work, and what each of us can expect. This consent will provide a clear framework for our work together. Feel free to discuss any of this with me. Please read and indicate that you have reviewed this information and agree to it by filling in the checkbox at the end of this document.

The Therapeutic Process

You have taken a very positive step by deciding to seek therapy. The outcome of your treatment depends largely on your willingness to engage in this process, which may, at times, result in considerable discomfort, Remembering unpleasant events and becoming aware of feelings attached to those events can bring on strong feelings of anger, depression, anxiety, etc. There are no miracle cures. I cannot promise that your behavior or circumstance will change. I can promise to support you and do my very best to understand you and repeating patterns, as well as to help you clarify what it is that you want for yourself.

Confidentiality

The session content and all relevant materials to the client's treatment will be held confidential unless the client requests in writing to have all or portions of such content released to a specifically named person/ persons. Limitations of such client held privilege of confidentiality

APPENDIX Y

[LOGO] Gmail

Karri Soujanya
<soujkarri11@gmail.com>

Re: Usha Karri- Fraudulent content in your Client Portal

1 message

Stephanie Bonza, Psy.D.

<stephanie.bonza@zealfamilywellness.com>

Thu, Aug 12, 2021 at 7:30 AM

To: Karri Soujanya <soujkarri11@gmail.com>

I have cancelled the appointments.

On Wed, Aug 11, 2021 at 10:23 PM Karri Soujanya
<soujkarri11@gmail.com> wrote:

Dr. Bonza,

As I clearly mentioned in my email below, I cannot agree with your standard consent that includes Psychotherapy. I am not here for a standard service from you.

So, I cannot work with you and hence, please cancel the appointments. I will report it to the court accordingly.

Sincerely,
Usha Karri.

On Aug 11, 2021, at 10:02 PM, Stephanie Bonza, Psy.D. <stephanie.bonza@zealfamilywellness.com> wrote:

Hello Usha,

This is a standard consent form that all of my clients sign. Please let me know if you would like to keep the appointments.

On Wed, Aug 11, 2021 at 9:32 PM Karri Soujanya <soujika11@gmail.com> wrote:
Dr.Bonza:

When I signed into your Client Portal based on the link you provided, I saw the content that says “**Informed Consent for Psychotherapy**” as shown in the attached screenshot.

I am very shocked about why you sent me this link to agree for a Psychotherapy when there is no such requirement from the court order provided to you and, I never agreed for going for Psychotherapy with you or anyone and the court did not even mention any such thing in the court order given to you.

Can you please let me know why you are asking me to give Consent for a Psychotherapy when you did not get any such order from the Court as per the Court order as attached here?

According to the court order provided to you by attorney Lynn Wypych (Guardian Ad Litem) on July 19, 2021 (signed by Judge William Yu on July 15, 2021) from Cook County Domestic Relations Court (Family Court), the order clearly says as below :

“1. That Dr. Stephanie Bonza is appointed to assess whether or not it is in the best

interests of the children (or either of them) at this time to have Zoom parenting time with Venkatesh while he is incarcerated in Federal Prison.

2. Both parties shall fully cooperate with Dr.Bonza in her assessment. Usha shall make the children available for Dr.Bonza at times as directed by her.”

Nowhere the court order says that you Dr.Bonza should give psychotherapy to the parties involved in this case.

Can you please explain why you are asking me to give consent for Psychotherapy which is not ordered by the court?

This is very fraudulent and outrageous to get this kind of direction from you as a court appointed Psychologist / Professional to conduct an assessment to see if it is in the best interests of children to provide parenting time via Zoom with their father (Venkatesh Bhogireddy) who is currently incarcerated in Federal Prison as he was convicted for this serious crime “Murder-For-Hire” where he tried to get his own family members (the mother of the children i.e., me and father of their cousins) murdered.

Obviously, I did not sign up for any Psychotherapy from you and also the court did not order you to give psychotherapy to the parties involved, either.

So, I cannot give any consent to you and hence, please cancel the appointments

123a

scheduled for tomorrow (Thursday, August 12, 2021),].

I will present this to the court accordingly.

Sincerely,
Usha Karri.

----- Forwarded message -----

From: **Zeal Family Wellness, LLC**

<yourprovider@simplepractice.com>

Date: Wed, Aug 11, 2021 at 7:57 PM

Subject: Sign in to your client portal –
08/11/2021, 7:57:29 PM (CDT)

To: U <soujikaarri11@gmail.com>

IMPORTANT: This is an automated message.
Please do not reply. For any questions please contact
your provider.

Here's the link you recently requested.

Sign in to your secure Client Portal.

Sign In

This one-time link will instantly sign you in
until 07:57 PM (CDT) on 08/12/2021

APPENDIX Z

Attorney No. 91797

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT,
DOMESTIC RELATIONS DIVISION

IN RE THE MARRIAGE)	
OF VENKATESH)	
BHOGIREDDY,)	
Petitioner,)	
)	No. 18 D 6785
and)	
)	
USHA SOUJANYA KARRI,)	
Respondent.)	

ORDER—SUBMITTED BY ELECTRONIC MEANS

THIS MATTER COMING TO BE HEARD on the Respondent, USHA SOUJANYA's Petition for Substitution of Judge filed 8/31/21, the Petitioner, VENKATESH BHOGIREDDY ("VENKATESH"), appearing through counsel, the Respondent, USHA SOUJANYA KARRI ("USHA") appearing on her own behalf, the Guardian Ad Litem, Lynn Wypych, appearing on behalf of the minor children, the Court having jurisdiction and being duly advised in its premises;

ACCORDINGLY, IT IS HEREBY ORDERED:

1. That the Respondent, USHA SOUJANYA KARRI's, Petition for Substitution of Judge for Cause and Other Relief filed 8/31/21 is hereby denied.

125a

2. That this matter is returned is to the Honorable Judge Yu for further proceedings.

ENTERED:

/s/ David E. Haracz #1878

JUDGE

Davis Friedman, LLP
135 South LaSalle Street, 36th Floor
Chicago, Illinois 60603
(312) 782-2220
service@davisfriedman.com

Lynn Wypych
Rosenberg Wypych LLC
3601 Algonquin Road, Suite 801
Rolling Meadows, IL 60008
847.758.1800
LWypych@rwlawllc.com

Usha Kari
4640 N. Sheridan Road,
Unit 1004
Chicago, Illinois 60640
soujkarri11@gmail.com

Associate Judge
David E. Haracz

OCT 7 2021
Circuit Court - 1878

APPENDIX AA
IN THE CIRCUIT COURT OF
COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT –
DOMESTIC RELATIONS DIVISION

IN RE: THE MARRIAGE)	42481
OF VENKATESH)	
BHOGIREDDY,)	
)	
Petitioner,)	Case No. 18 D 6785
)	
And,)	
)	
USHA SOUJANYA KARRI,)	
)	
Respondent.)	

AMENDED ORDER
SUBMITTED BY ELECTRONIC MEANS

This matter coming on to be heard for ruling on Respondent's Motion to Cancel Dr. Bonza's Assessment and for Status on Trial setting, the Court having reviewed the pleadings and heard argument in this matter;

IT IS HEREBY ORDERED:

1. This Court has no authority or jurisdiction to entertain Respondent's request for FBI investigation.
2. The Motion to Cancel Dr. Bonza's Assessment is denied.
3. Said Assessment shall proceed immediately focusing solely on whether or not it is in the

best interest of the minor children of the parties to have Zoom parenting time with their father while he is incarcerated in federal prison.

4. That both parties shall fully cooperate with Dr. Bonza in said Assessment and shall contact her on or before December 10, 2021.
5. That Dr. Stephanie Bonza is authorized to speak to, share confidential information and release her Assessment to the Guardian ad Litem, Lynn Wypych.
6. That no psychotherapy or any other therapy focusing on Usha Karri shall be conducted by Dr. Bonza.
7. That Status in this matter for Trial setting is continued to January 19, 2022, at 1:30 p.m. via Zoom (ID: 914 3656 4382 PW: DRDCa153).

Jami Buzinski, Esq.	Usha Soujanya Karri
Attorneys for Petitioner	Pro Se Respondent
jbuzinski@davisfriedman.com	Soujika11@gmail.com

Lynn Wypych, Esq.
Guardian ad Litem
LWypych@rwlawllc.com

ENTERED: 12/03/2021

/s/ Will Yu #2221
JUDGE

128a

Rosenberg Wypych LLC
Guardian ad Litem
3601 Algonquin Rd., Suite 801
Rolling Meadows, IL 60008
(847) 758-1800
admin@rwlawllc.com
Atty. No. 42481

APPENDIX AB

[LOGO] Gmail

Karri Soujanya
<soujkarri11@gmail.com>

Bhogireddy

1 message

Lynn Wypych <LWypych@rwlawllc.com>

Wed, Jan 12, 2022 at 10:22 AM

To: "Usha Karri (soujkarri11@gmail.com)"

<soujkarri11@gmail.com>, "Jami M. Buzinski"

<jbuzinski@davisfriedman.com>

Good Morning:

Please be advised that at this point, Dr. Bonza does not have the availability to proceed with the assessment. You might remember she was originally appointed in or around July at which time she did have the availability but as of now she does not.

Lynn Wypych
Rosenberg Wypych LLC
3601 Algonquin Road, Suite 801
Rolling Meadows, IL 60008
847.758.1800

CONFIDENTIALITY NOTE:

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APPENDIX AC

* * *

appointed in her divorce proceedings, and her two former attorneys. The allegations as to Dr. Bonza include claims of “conspiracy” and “fraud” yet without any factual support. (Ex. A, p. 113-115, 125-139) Plaintiff even names the United States Attorney General as a Defendant, alleging that he failed to act on Plaintiff’s reports of criminal conduct purportedly taken by the other named Defendants during the divorce proceeding. *Id.*

In her Second Amended Complaint, Plaintiff alleges that specific orders were entered in her domestic relations proceeding that were improper, including, *inter cilia*, one that required her to undergo a psychological evaluation as part of custody proceedings with Dr. Bonza. (Ex. A, p. 113-115, 125-139) Plaintiff claims that Judge Yu and Judge Walker, in conspiracy with Bhogireddy and other named Defendants, ordered Dr. Bonza, a court-appointed psychologist, to conduct a fraudulent custody evaluation of her with the secret purposes of either to: 1) fabricate a story that Plaintiff attacked Dr. Bonza; 2) have Dr. Bonza fabricate mental health issues for Plaintiff; or 3) have Dr. Bonza murder Plaintiff by giving her an overdose of insulin. (Ex. A, ¶ 251) Plaintiff seeks a declaratory judgment that her rights have been violated as to all Defendants and certain money damages from each named Defendant. (Ex. A, p. 189-191) As to Dr. Bonza, Plaintiff seeks money damages for unspecified fraud, intimidation, emotional

distress and suffering, and punitive damages. *Id.* at 191.

As set forth below, Plaintiff's §1983 claims are barred by the *Rooker-Feldman* doctrine, as they all arise from orders entered during her divorce proceedings in state court. Moreover, as a court-appointed expert, Dr. Bonza is entitled to absolute immunity from liability. Finally, Plaintiff's allegations against Dr. Bonza fail to state a claim under the 14th Amendment. For these reasons, Dr. Bonza asks this Court to dismiss Plaintiff's claims against her with prejudice.

* * *

assessing the applicability of the *Rooker-Feldman* doctrine in a particular case, the fundamental question is whether the injury alleged by the federal plaintiff resulted from the state court judgment or is distinct from it. *Long v. Shorebank Dev. Corp.*, 182 F.3d 548, 555 (7th Cir. 1999) (internal citations and quotations omitted). If the alleged injury results from the state court's judgment, then federal courts lack subject matter jurisdiction. *Id.*

This Court lacks subject matter jurisdiction over Plaintiff's allegations against Dr. Bonza under the *Rooker-Feldman* doctrine. The injuries Plaintiff alleges Dr. Bonza caused her result from a state court order compelling Ms. Karri to undergo a psychological assessment to determine whether Zoom parenting time with Bhogireddy was appropriate. (Ex. A, p. 113-115, 125-139) Since her injuries directly result from a state court judgment, the *Rooker-Feldman* doctrine acts as a

jurisdictional bar to these claims. As such, Dr. Bonza requests this Court dismiss the claims against her with prejudice under Rule 12(b)(1) of the Federal Rules of Civil Procedure.

II. As a court-appointed expert, Dr. Bonza is entitled to absolute civil immunity. Thus, Plaintiff's claims against her are barred.

Court-appointed experts, including psychiatrists, are absolutely immune from civil liability for damages when they act under the court's direction. *Cooney v. Rossiter*, 583 F.3d 967, 970 (7th Cir. 2009)(collecting cases). They are arms of the court, much like special masters, and deserve protection from harassment by disappointed litigants, just as judges do. *Id.* (internal quotations omitted). "Experts asked to advise on what disposition will serve the best interests of a child in a custody proceeding need absolute immunity to fulfill their obligations without the worry and harassment from dissatisfied parents." *Id.* (internal citation omitted).

Plaintiff's claims against Dr. Bonza are barred because the allegations relate to Dr. Bonza's conduct as a court-appointed expert. As such, she is entitled to absolute immunity from liability.

APPENDIX AD

REQUEST FOR HELP AND INVESTIGATION

Usha Karri

4640 N Sheridan Rd, Apt# 1004,
Chicago, IL 60640.

February 22, 2022

To

Mr. David O'Neal Brown,

Superintendent of Police,

Chicago Police Department,

3510 South Michigan Avenue, Chicago, IL 60653.

Reg: Coverup of Criminal Cases by Chicago Police - Led to Further Crime of 'Murder-for-Hire' - Pending Investigation on COPA Complaint with Log# 2020-4775

Dear Mr. Brown:

This is Usha Karri, the complainant of the COPA complaint with **Log# 2020-4775** (filed by Office of the Inspector General - City of Chicago in October 2020) regarding the misconduct and fraud by Det. Samuel Truesdale, Sergeant Daniel Schaedel and Det. Danielle Davis in covering up the felony criminal cases like Battery and Criminal Sexual Assault (**RD# JB337844**) and Violation of Order of Protection (**RD# JB337916**) by theft of my personal property like gold jewelry worth around 81,570 USD and expensive dresses worth around 10,000 USD (as retaliation for reporting the Domestic Violence to the police) when an Order of Protection was in effect, against my ex husband 'Venkatesh Bhogireddy'.

The COPA complaint was assigned to Sergeant Steven Petrowski from the Bureau of Internal Affairs, And, Sergeant Petrowski conducted the initial interview to record my statement on Tuesday, January 5, 2021. The sergeant told me that I would have to come back again to testify in front of the officers I complained against and he asked me to provide him with documents related to my interactions with CPD including the timeline. I provided the information by email on January 12, 2021 accordingly (as attached here with this request). The sergeant never called me back for me to testify, so far.

On March 9, 2021, when I checked with Sergeant Petrowski by email on status, he confirmed that the investigation was still in progress and he asked me to call the CPD to find the status on the criminal cases I filed.

On March 10, 2021, when I tried to check for the status of the criminal cases I filed against Venkatesh, over the phone, I was connected to Detective Samuel Truesdale, who worked on my cases before. The Detective Samuel Truesdale told me that he was not working on my cases anymore and he mentioned to me that my ex-husband 'Venkatesh' told him that he had already returned my Gold Jewelry to me. When I told him that it was not the case, Det. Samuel Truesdale said to me that he would speak to the State's Attorney's Office (of Cook County) to file the charges and get back to me by 11 AM the next day. He never called me back so far.

On July 27, 2021, I reached out to Sergeant Steven Petrowski by email to find the status of the CODA complaint about misconduct of Chicago police in covering up the criminal cases I filed against Venkatesh. Sergeant Steven Petrowski did not respond to my email so far.

This is how one officer after another from CPD, has been covering up the criminal cases for the last 3 years.

This coverup by Chicago Police led to further crime where Venkatesh hired someone to get me and my uncle from New Jersey murdered, to get rid of the witnesses and to cover up the criminal cases permanently.

Federal agents from ATF caught Venkatesh along with audio and video recordings as evidence and filed a 'Murder-for-Hire' case in the Federal Criminal court in Chicago on October 3, 2019. According to the criminal complaint, Venkatesh planned to murder my uncle by having him pushed in front of a subway train or hurt him badly to end up in coma and he planned to get me murdered by injecting a large dose of Insulin when I slept. The federal criminal case number is: **USA v. Bhogireddy - Case# 2019R00722**.

On May 27, 2021, Venkatesh was convicted by a Federal Jury of the crime with 'Murder-for-Hire' charges as he tried to get my uncle murdered.

And, Chicago police did not take any action on the criminal cases pending with them and also on the plans by Venkatesh to get me murdered, so far.

I reported the misconduct of Chicago Police to then Chicago Police Chief Eddie T. Johnson, and to Chicago Mayor Lori Lightfoot's office several times from June 2019 to September 2020.

I also reported the coverup of criminal cases by Chicago police to the FBI on June 28, 2019 and also to the US Attorney's office through Assistant US Attorney Jason Julian, who handled the prosecution of the 'Murder-for-Hire' criminal case against Venkatesh. I also reported the coverup by Chicago Police to The Office of Illinois Attorney General, Kwame Raoul on September 3, 2020.

I request you to please take action to complete the investigation of the pending criminal cases against Venkatesh and file the charges accordingly.

Thanks for your kind attention to this request.

Sincerely,

/s/ [Illegible]

Usha Karri.

Ph: 708-400-2967.

Documents attached along with the Request Letter:

1. A copy of the document with details and timeline of my interactions (including how the previous COPA Complaint was covered up by CPD in 2019) with CPD regarding the criminal cases I filed.

2. A copy of my email conversation (including the one I sent on July 27, 2021) to Sergeant Steven Petrowski, who has been conducting the investigation from January 5, 2021 of the COPA complaint.
-

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APPENDIX AE

[LOGO] Gmail

Karri Soujanya
<soujkarri11@gmail.com>

Re: COPA Log # 2020-4775 - Usha Karri-CPD TimelineDocs- Part 5 of 5
1 message

Karri Soujanya <soujkarri11@gmail.com>

Tue, Jul 27, 2021 at 3:42 PM

To: "Petrowski, Steven M."

<Steven.Petrowski@chicagopolice.org>

Hi Sergeant Petrowski,

According to Chicago's WBBM-TV as of Monday (July 26, 2021), Chicago's Police Chief David Brown claimed that Police Officers in Chicago were doing their part (to curb the crime in Chicago), but contended that Violent Offenders needed top consequences in the City's Courts.

As you already know, Chicago Police covered up the Criminal Cases for Domestic Battery, Criminal Sexual Assault and theft of Gold Jewelry worth of 81,570.00 USD while an Order of Protection was in effect, for the last three years, as I reported to you before.

This is in contrast with whatever Chicago Police Chief David Brown is claiming on the TV to the public.

You started the investigation for the cover up/misconduct by the Chicago Police in the beginning of January 2021. I provided you with all the information you

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requested, on January 12,2021. So, it has been more than six months since I provided you with all the information you required.

Can you please provide the status of your investigation of the fraud/misconduct by Chicago Police in covering up the Criminal Cases pending against Venkatesh Bhogireddy?

Thanks,
Usha Karri.

On Fri, Apr 23, 2021 at 11:16 AM Karri Soujanya
<soujkarri11@gmail.com> wrote:

Hi Sergeant Petrowski,
Could you please let me know any status update on this investigation?

Thanks,
Usha Karri.

On Tue, Mar 9, 2021 at 9:06 AM Karri Soujanya
<soujkarri11@gmail.com> wrote:

Good Morning !
Hi Sergeant Petrowski,
Thank you so much for your response.
Regards, Usha.

On Mar 9, 2021, at 8:13 AM, Petrowski, Steven
M. <Steven.Petrowski@chicagopolice.org> wrote:

Ms. Karri,
My administrative investigation into your allegation(s) is still ongoing.

As for any criminal investigation that you may have ongoing, I have no say in what direction that it may go, and it is only indirectly connected to the allegation that you have made against a member of the Chicago Police Department.

You may want to contact the Area Detective Division who are handling the criminal investigation and discuss with their supervisor on what direction it may go.

Regards,

Sgt. Steve Petrowski #1947
General Investigations Section
Bureau of Internal Affairs
3510 S. Michigan Ave – 5th Fl.
Chicago, IL 60653
Phone 312-745-6310
PAX 0610

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From: Karri Soujanya <sou-jikarri11@gmail.com>
Sent: Monday, March 8, 2021 7:31 PM
To: Petrowski, Steven M. <Steven.Petrowski@chicagopolice.org>
Subject: Re: COPA Log # 2020-4775 - Usha Karri- CPU TimelineDocs-Part 5 of 5

Hi Sergeant Petrowski,

Could you please provide the status of this complaint?

Also, as the CPD officer Costello (the CPD contact provided to me by the IG office) advised me to check with you, can you please advise if the cases can be reassigned to a different detective for the completion of the investigation, as they are going to run out of time soon?

Thanks,
Usha Karri

On Tue, Mar 2, 2021 at 2:42 PM Karri Soujanya <soujikarri11@gmail.com> wrote:

Hi Sergeant Petrowski,

As advised by the IG office, I am reaching out to you. Could you please provide the status of this complaint?

Thank you,
Usha Karri.

On Tue, Jan 12, 2021 at 2:44 PM Petrowski, Steven M. <Steven.Petrowski@chicagopolice.org> wrote:

Ms. Karri,

I confirm receiving them. I will review and place in the file.

Sgt. S. Petrowski #1947

Get Outlook for iOS

From: Karri Soujanya

<soujikkarrill@gmail.com>

Sent: Tuesday, January 12, 2021 2:55:00 AM

To: Petrowski, Steven M.

<Steven.Petrowski@chicagopolice.org>

Subject: Re: COPA Log # 2020-4775 – Usha
Karri-CPD TimelineDocs-Part 5 of 5

Here is the Part 5 of 5 emails (this is the final email). It has 8 supporting documents as attachments.

On Tue, Jan 12, 2021 at 2:51 AM Karri

Soujanya <soujikkarrill@gmail.com> wrote:

Here is the Part 3 of 5 emails.

It has 8 supporting documents as attachments.

On Tue, Jan 12, 2021 at 2:49 AM Karri

Soujanya <soujikkarrill@gmail.com> wrote:

Here is the Part 3 of 5 emails.

It has 8 supporting documents as attachments.

On Tue, Jan 12, 2021 at 2:47 AM Karri

Soujanya <soujikkarrill@gmail.com> wrote:

Here is the Part 2 of 5 emails.

It has 8 supporting documents as attachments.

On Tue, Jan 12, 2021 at 2:42 AM Karri Soujanya <soujika11@gmail.com> wrote:

Hi Sergeant Petrowski,

This is Usha Karri, the complainant from the COPA complaint with Log # 2020- 4775. During my last meeting with you on January 5, 2021 for my initial interview, you asked me to provide you with the documents related to my conversations with the CPD regarding the criminal cases I filed.

I am sending them as part of a group of 5 emails with attachments.

Please note that the first email (i.e., this email) has the main document with the details of the timeline.

And the other four emails have the supporting documents (32 in total).

Please let me know if you have any questions.

Thanks,

Usha Karri.
708-400-2967.

**** EXTERNAL EMAIL WARNING **** This email originated outside of the Chicago Police Department. ****NEVER CLICK, DOWNLOAD, or OPEN**** unexpected links or attachments. ****NEVER**** provide User ID (PC Number) or Password or other sensitive information. If this

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| email seems suspicious, contact the City of Chi-
| cago Help Desk at 312-744-DATA (312-744-3282)
| or follow instructions on THE WIRE to report
| Junk Email or SPAM.

APPENDIX AF
URGENT – REQUEST FOR INVESTIGATION

October 4, 2021

To
The Honorable Merrick B. Garland
Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001.

Subject: Cover-up of Domestic Violence Cases and Rigging of the Court System – Led to Another Crime (Federal) with ‘Murder-for-Hire’ Case – USA v. Bhogireddy – Case# 2019R00722 – Continued Criminal Actions and Retaliation for Reporting the Crime to the Court

Dear Mr. Attorney General:

I am Usha Karri, a resident of Chicago, Illinois, I am a victim of severe domestic violence at the hands of my ex husband “Venkatesh Bhogireddy” and hence, I am a Petitioner in the OP case **(2018OP73493)**. I am also a Respondent in the Divorce case **(2018D0006785)** in Cook County Domestic Relations Court in Chicago.

This request is a follow-up to the request **(dated March 26, 2021)** I sent to your office via USPS (delivered to your office on April 1, 2021) for help with investigation of cover-up of Domestic Violence criminal cases and rigging of the court/legal system.

When I reported severe Domestic Violence to the Chicago police in May 2018, a case for OP was filed in Cook County Domestic Violence Courthouse and then the

case was transferred to Cook County Domestic Relations (Family) Court as Venkatesh filed for Divorce. There, all the crime was covered up by judges, court appointed experts and lawyers on both parties sides along with Chicago Police and Cook County State Prosecutors by rigging the court system in favor of the perpetrator of the crime (i.e. Venkatesh) driven by bribes in millions of dollars using illegal money from India.

This coverup resulted in further crime by Venkatesh with plans to get me and my uncle from New Jersey (who helped me get legal help and is one of the key witnesses in the cases), murdered. It was found by federal agents from ATF and it led to a federal criminal case with 'Murder-for-Hire' charges (**USA v. Bhogireddy – Case# 2019R00722**) against Venkatesh filed on October 2, 2019. Venkatesh was convicted for the crime by a federal jury on May 27, 2021. The sentencing is scheduled for October 28, 2021.

It is like a scheme that provides an end to end solution to protect perpetrators of serious crime if they bribe the above 'people with power', as if there is **NO 'Rule of Law'**. **In this case, it also included helping Venkatesh with his preparations to get me murdered.**

Their actions show that they are very confident that no law enforcement agency like the FBI and US Attorney's Office in Chicago would take any action against them to bring them to accountability.

Especially, during the present time when everyone all over the nation (including the US President Joe Biden and US Attorney General Merrick Garland who recently visited Chicago) is wondering about the reasons for ever growing crime in Chicago, this very big reason at the center of the court system and law enforcement needs to be addressed in order to safeguard the public trust in the legal/court system and law enforcement.

Facts Concealed During the Federal Trial for Murder-For-Hire Case

The most shocking thing is the federal prosecutors from the US Attorney's Office (from Northern District of Illinois, Chicago) who handled the above 'Murder-for-Hire' federal criminal case against Venkatesh, concealed the important facts during the trial as listed below:

- a. History of Domestic Violence by Venkatesh and the criminal cases for Domestic Battery, Criminal Sexual Assault and Theft of Gold jewelry as retaliation, which are still pending with Chicago Police.
- b. The real motive for the planned murders, which is to cover up the felony criminal cases pending with Chicago police. And, I was not allowed to testify as a witness.
- c. The fact that Venkatesh hired 2 teams of people to murder me and my uncle. Venkatesh even brought one team (2 hit men) to the courtroom on October 2, 2019, during a court hearing in order for them to identify me.

- d. The court orders from family court produced as evidence by defense lawyer of Venkatesh during the trial were the orders, which were fraudulently created by judges and lawyers from family court as I explained along with the details in the attached documents.

Contrast to the US Attorney's Office from Eastern District of New York

Even though I provided all the details (including the evidence in hundreds of pages of documents) of the serious fraud and crime committed by several people in covering up the domestic violence criminal cases by rigging the legal system in favor of Venkatesh, to the prosecutors from US Attorney's Office in Chicago, they did not take any action and they even concealed the facts during the federal trial as I explained above. And, Venkatesh's actions (while being out on bail) with continued retaliation against me and my parents in India show that he was very confident that he could get away with the crime he was charged for, in the above federal criminal case.

Whereas prosecutors from the US Attorney's Office from Eastern District of New York, took serious action on the crime by public officials with power including the former Suffolk County District Attorney 'Tom Spate' from Long Island and his associate and a police chief.

The above comparison clearly shows why there is so much crime in Chicago, because the US

Attorney's Office in Chicago is not being truthful to their duty, very much similar to the local law enforcement departments in Chicago.

At a high level, below is the summary of this cover-up scandal as I witnessed and documented for the last 3 years:

1. Chicago Police (CPD) covered up the felony criminal cases: Battery, Criminal Sexual Assault (**RD#JB337844**) and Theft of Gold Jewelry (**RD#JB337916**) as Retaliation, providing the base for the scandal.
2. Cook County Prosecutors concealed the evidence and got another criminal case (**RD# JB374716**) dismissed.
3. **Two teams of people** were hired to murder me and my uncle, a key witness in the cases, for further cover-up. One team was even brought to the courtroom on October 2, 2019, during a court hearing in order for them to identify me. Other witnesses were threatened and evidence was destroyed.
4. **Judge Marya Nega** (retired now) helped to terminate my Order of Protection fraudulently, another **Judge Debra Walker** helped with the preparations to murder me, and the next **Judge William Yu** retaliated against me for reporting this crime to the court.
5. Court appointed experts concealed the crime from their reports to the court.

6. Fraudulent and Forged court orders were created and, False documents were filed by lawyers.
7. Reporting to Investigation Agencies (local, US Attorney's office, FBI, etc.) DID NOT help.
8. No action by Bureau of Internal Affairs from CPD since December 2020, on my complaint (**COPA Log# 2020-4775**) about this cover-up by Chicago Police.
- 9. The above list shows how people from legal/ court system and law enforcement are contributing to the ever growing crime in Chicago without any accountability, as if there is NO 'Rule of Law'.**

Last Update from CPD:

On March 10, 2021, when I tried to check for the status of the above complaint about the cover-up by Chicago Police, I was connected to Detective Samuel Truesdale, who was originally assigned to my cases.

The Detective told me that he was not working on my cases any more and he mentioned to me that my ex husband 'Venkatesh' told him that he had already returned my Gold Jewelry to me. When I told him that it was not the case, Del. Truesdale said to me that he would speak to the State's Attorney's Office (i.e., for filing criminal charges) and get back to me by 11 AM the next day. He never called me back so far.

Reporting to Higher-ups and Authorities:

I already filed the details of the serious fraud and crime committed by Judges, as part of my pleadings in the court. I also reported it to the '**Office of Chief Judge, Cook County Circuit Courts**' and to the '**Judicial Inquiry Board for the State of Illinois**'.

I also reported this cover-up scandal with serious crime to the Office of Illinois Attorney General Kwame Raoul.

Meeting with Members of the National Task Force to End Sexual and Domestic Violence:

I learnt from the news that US Attorney General, Deputy Attorney General and Assistant Attorney General convened a virtual listening session on September 30, 2021 with Members of the National Task Force to End Sexual and Domestic Violence to discuss the unmet needs of survivors and the ways in which the Violence Against Women Act (VAWA) could be improved and strengthened to help to meet those needs.

I strongly pray to you all that there should be action against the cover-up of the Domestic Violence criminal cases too. Otherwise, there will be continued retaliation (for reporting the crime to law enforcement) and furthermore crime against the victims and their family members as happened in my case as I explained here.

Please refer to the documents attached with this request for more details.

WHEREFORE, I respectfully request you to order for a federal criminal investigation of all the individuals involved in covering up the crime and rigging of the legal/court system driven by bribes in millions of dollars, in order to stop and address this serious crime and to safeguard the respect and trust of the public in the legal/court system and law enforcement.

Please let me know if you have any questions or need further information.

I thank you for your kind attention to this request.

Sincerely,

/s/ Karri [Illegible] (Oct. 4, 2021)
Usha Karri.
4640 N Sheridan Rd, Apt# 1004,
Chicago, IL 60640.
Phone: 708-400-2967.

Here is the List of Documents Attached to This Request:

1. A copy of the letter submitted to the 'Office of Illinois Attorney General Kwame Raoul' requesting for an investigation of the cover-up scandal.
2. A copy of the request letter submitted to the 'Judicial Inquiry Board' of the State of Illinois for an investigation and action.
3. A copy with the list of supporting documents provided to the Judicial Inquiry Board.

4. A copy of the request letter submitted to the 'Office of Chief Judge, Cook County Circuit Courts', for an investigation.
 5. A copy of the document filed in the court with 'Details of Misconduct by Judge William Yu' as part of a 'Petition for Substitution of Judge for Cause',
 6. A copy of the exhibits associated with the above Petition.
 7. A copy of the document with 'Details of Misconduct by Judge Debra Walker' as provided to the Judicial Inquiry Board.
 8. A copy of the request letter dated March 26, 2021 I sent to your office about the cover-up of the criminal cases by Chicago police and others from the legal system.
 9. A copy with the list of supporting documents provided along with the above request letter to your office.
 10. A copy of the 'Motion to Cancel Assessment for Zoom Parenting Time' filed in the Cook County Domestic Relations (Family) court.
 11. A copy of the exhibits associated with the above Motion filed in the court.
-

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APPENDIX AG

[SEAL]

U.S. Department of Justice
Criminal Division
Washington, DC 20530-0001
November 12, 2021

Usha Karri
4640 N. Sheridan Rd
Apt 1004
Chicago, IL 60640

Dear Ms. Karri:

This responds to your letter dated October 4, 2021, addressed to Attorney General, Merrick B. Garland. The following information should assist you in bringing your allegations to the authorities that are best-suited to handle this matter.

Based on the information you provided, you may wish to forward your complaint to the State Attorney General for your state, who has jurisdiction to review the matters that you raise.

You may wish to provide your information regarding local judges to the disciplinary body in your state that has the authority to review allegations of misconduct by local judges.

If you believe that this matter may constitute federal criminal activity, you should contact the Federal Bureau of Investigation (FBI), the investigative arm of the Department of Justice. The FBI will determine whether a federal investigation may be warranted. If appropriate, the FBI will refer the matter to a United

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States Attorney for a final determination regarding legal action.

We hope that this information has been helpful.

Sincerely,

Correspondence Management Staff
Office of Administration

Reference Number: SB301680852

*For further correspondence please email
criminal.division@doj.gov. Should you wish to
speak to a representative please call (202) 353-4641
and provide the reference number.*

APPENDIX AH

[SEAL]

U.S. Department of Justice
United States Attorney
Northern District of Illinois

Thomas P. Walsh
Assistant United
States Attorney
Civil Division Chief

Dirksen Federal Courthouse
219 South Dearborn Street,
Fifth Floor
Chicago, Illinois 60604
Phone: 312-353-5312

October 11, 2022

Christopher G. Conway, Clerk
United States Court of Appeals
for the Seventh Circuit
219 South Dearborn Street
Chicago, Illinois 60604

Re: Notice of No Brief in *Usha. Karri v. Attorney*
General Merrick B. Garland, et al., No. 22-
2363 (7th Cir.)

Dear Mr. Conway:

Although the U.S. Attorney General was a named defendant in the above case, he was never served and did not participate in the district court before plaintiffs “fantastical” claims were dismissed. Dkt. 47 at 3. The Attorney General does not plan to submit a brief in this appeal.

Very truly yours,

JOHN R. LAUSCH, Jr.
United States Attorney

By: s/ Thomas Walsh
THOMAS P. WALSH
Assistant United States Attorney

APPENDIX AI

U.S.C.A. – 7th Circuit
RECEIVED
NOV 14 2022 CAG

**IN THE UNITED STATES COURT OF APPEALS
FOR THE SEVENTH CIRCUIT
No 22-2363**

USHA SOUJANYA KARRI,)	On Appeal from the
Plaintiff-Appellant,)	final Judgment and
)	Order of the United
v.)	States District Court
MERRICK B. GARLAND,)	for the Northern
DAVID O. BROWN, DEBRA)	District of Illinois,
B. WALKER, WILLIAM YU,)	Eastern Division.
DAVID E. HARACZ, LYNN)	
WYPYCH, JANET E.)	Case No.
BOYLE, ARID R. FIFE,)	1:22-cv-00055
STEPHANIE BONZA,)	The Honorable
JAMI M. BUZINSKI, and)	Ronald A. Guzman
VENKATESH)	
BHOGIREDDY,)	
Defendants-Appellees)	

**REPLY OF PLAINTIFF-APPELLANT
USHA SOUJANYA KARRI TO ‘NOTICE OF
NO BRIEF’ FILED ON OCTOBER 11, 2022
BY DEFENDANT-APPELLEE
MERRICK B. GARLAND**

Usha Soujanya Karri
pro se,
4640 N. Sheridan Road, Apt 1004,

Chicago, IL 60640.
Phone: 708-400-2967.
Email: SOUJIKARRI11@GMAIL.COM.

Plaintiff-Appellant.

I, the Plaintiff-Appellant USHA SOUJANYA KARRI as pro se, provide the Reply to the ‘Notice of No Brief’, which included incorrect information as filed by US Attorney John R. Lausch, Jr, and Assistant US Attorney Thomas P. Walsh on behalf of Defendant GARLAND and in support thereof, I state as below:

On October 11, 2022, in the ‘Notice of No Brief’ (CCDkt. #16) filed, US Attorney John R. Lausch, Jr, and Assistant US Attorney Thomas P Walsh made the below statement on behalf of Defendant GARLAND, the US Attorney General who is also a former Chief Judge of the US Court of Appeals for the District of Columbia Circuit:

“Although the US. Attorney General was a named defendant in the above case, he was never served and did not participate in the district court before plaintiff’s “fantastical” claims were dismissed”.

I agree with a part of the above statement and I disagree with 2 parts of the statement, which are specifically: (1) “he was never served” and (2) “plaintiff’s “fantastical” claims”, referring to the claims in the Second Amended Complaint, which was dismissed by the District Court, as explained below.

1. Defendant GARLAND was not Served – Service of the Complaint and Summons

After I filed the lawsuit on January 5, 2022 for Deprivation of my Civil Rights, all the 11 defendants were served at least one of the ‘Original Complaint and the Summons’ or ‘First Amended Complaint and Alias Summons’ (Defendants BROWN and BONZA were only included in the case from here) or ‘Second Amended Complaint and Alias Summons’.

In the case of Defendant GARLAND, I served all 3 Complaints and the Summons to both Defendant GARLAND and the US Attorney in Chicago, John R. Lausch, Jr. as detailed below:

(i) The Original Complaint (Dkt. #1) was filed on January 5, 2022

The original complaint and summons were served and delivered via USPS Mail to Defendant GARLAND on January 21, 2022 (Dkt. # 12) and to the US Attorney John Lausch on January 19, 2022 (Dkt. #11).

(ii) The First Amended Complaint (Dkt. #27) was filed on March 16, 2022

The first amended complaint and alias summons were served and delivered via USPS Mail to Defendant GARLAND on April 4, 2022 (Dkt. #35) and to the US Attorney John Lausch on March 31, 2022 (Dkt. #36).

(iii) The Second Amended Complaint (Dkt. #44) was filed on April 27, 2022

The second amended complaint and alias summons were served and delivered via USPS Mail to Defendant GARLAND on May 3, 2022 (Dkt. #52) and to the US Attorney John Lausch on May 2, 2022 (Dkt. #53).

As listed above, I filed the ‘proof of service’ for the 3 services accordingly.

Hence, the attorneys Lausch and Walsh are not correct when they say that Defendant GARLAND was not served during the proceedings of the case in the District Court. It is shocking to know how they filed the incorrect information in this Court while they represent the US Attorney General.

2. “Plaintiff’s Fantastical Claims” were Dismissed – How Did the Attorneys Know if the Claims Were “Fantastical” When the Complaint was not Served?

If the USPS staff lied 3 times in the cases of both Defendant GARLAND and US Attorney John Lausch that they delivered the 3 Complaints and Summons, even though they did not deliver them, and if the attorneys Lausch and Walsh were true that the Complaint was never served, how did the attorneys Lausch and Walsh know that the claims in the complaint were “fantastical”?

One way for the attorneys to know about the claims in the Complaint is, by discussing with the other Defendants in this case. That was what I alleged and reported to the Court that federal prosecutors led

by US Attorney John Lausch covered up the crime and bribery, and that they were coordinating further crime by Defendant BHOGIREDDY and other defendants (CCDkt. #14, Opening-Brief, at p.8-9 and as described in SA15-19) against me in order to obstruct me from presenting my 'Victim Impact Statement' during the 'Sentencing Hearing' in the 'Murder-for-Hire' federal criminal case against Defendant BHOGIREDDY.

Attorneys Lausch and Walsh labeled the claims in the Complaint as "fantastical" without substantiating it, by concealing the truth and facts from this Court, especially while representing the US Attorney General, Defendant GARLAND, in order to cover up the serious fraud, crime and bribery I reported to the District Court.

3. Coverup of Crime by Federal Prosecutors, which Resulted in Further Crime

On August 11, 2022, during a public announcement related to FBI Search of former US President Donald Trump's residence, the US Attorney General, Merrick Garland said:

"Faithful adherence to the Rule of Law' is bedrock principle of the Justice Department and our Democracy. Upholding the 'Rule of Law' means applying the law evenly without fear or favor. Under my watch, that is precisely what the Justice Department is doing".

However, when I reported this serious crime, coverup and bribery to the US Attorney General, Defendant GARLAND in October 2021 (**SA148-154**), there was no action (**SA155**).

When it comes to Chicago and specifically this case, the actions by attorneys Lausch and Walsh show that they are not adhering to the 'Rule of Law', the bedrock principle of the Justice Department, based on the way they filed the 'Notice of No Brief' in this Court, by including incorrect information and by covering up the serious crime and bribery as listed below:

(i) Instead of telling the truth of how Defendant BHOGIREDDY bribed the Chicago Police and Cook County State Prosecutors (**CCDkt. #14**, Opening Brief, at p.6) to cover up the felony criminal cases: Battery, Criminal Sexual Assault and theft of my gold jewelry (**SA33-39**) and how he committed further crime with 'Murder-for-Hire' plans, the attorneys called the claims in the Complaint as "fantastical".

(ii) Instead of telling the truth of how Defendant BHOGIREDDY bribed the state-court judge, Defendant WALKER along with Defendants WYPYCH, BUZINSKI, BOYLE and FIFE to create fraudulent and unlawful court orders on July 25, 2019 (**SA75-78**) and September 3, 2019 (**SA79-80**) to help him with his plans to get me murdered, the attorneys labeled the claims in the Complaint as "fantastical".

(iii) Instead of telling the truth of how Defendant BHOGIREDDY bribed the state-court judge, Defendant WALKER along with Defendant BUZINSKI to

create fraudulent and unlawful court order on May 18, 2020 (**SA83-85**) to influence the federal court in his favor, which was questioned by the federal court for its justification on May 20, 2020 (**SA86-87**), the attorneys labeled the claims in the Complaint as “fantastical”.

(iv) Instead of telling the truth of how Defendant BHOGIREDDY while being out on bail in the ‘Murder-for-Hire’ federal criminal case, further committed crimes: by filing false information in the State Court along with his attorney Defendant BUZINSKI to evade paying full temporary child support and by having his father ‘Prudhvi Narayana’ harass my parents in India through land grabbing using forgery documents and with plans to kidnap and murder them using false police report (**SA88-91**), the attorneys called the claims in the Complaint as “fantastical”.

(v) Instead of telling the truth of how the federal prosecutors led by US Attorney John R. Lausch and Assistant US Attorney Jason A. Julien covered up the above crimes of Defendant BHOGIREDDY and how they misrepresented the real motive of Defendant BHOGIREDDY and how they obstructed me (one of the victims, identified as ‘Individual A’ in the case) from testifying, during the trial in May 2021 in the ‘Murder-for-Hire’ federal criminal case, the attorneys labeled the claims in the Complaint as “fantastical”.

(vi) Instead of telling the truth of how the state court judges Defendants YU and HARACZ along with Defendants WYPYCH, BUZINSKI and BONZA helped Defendant BHOGIREDDY (even while he is

incarcerated in federal prison) with his plans to get me murdered in the cover of ‘Assessment for Zoom Parenting Time for Defendant BHOGIREDDY’ using fraudulent and unlawful court orders on July 15, 2021 and December 3, 2021, in order to obstruct me from presenting my ‘Victim Impact Statement’ during the ‘Sentencing Hearing’ in the ‘Murder-for-Hire’ federal criminal case, the attorneys labeled the claims in the Complaint as “fantastical”.

(vii) Instead of telling the truth of how federal prosecutors led by US Attorney John Lausch and Assistant US Attorney Jason A. Julien filed in the District Court on October 15, 2021 as part of their ‘Sentencing Memo’ (**SA1-12**) that Defendant BHOGIREDDY does not have any criminal history, even though he committed several felony crimes including bribery as mentioned above, the attorneys labeled the claims in the Complaint as “fantastical”.

(viii) Instead of telling the truth about the real reason why there has been no ‘Sentencing Hearing’ for Defendant BHOGIREDDY in the ‘Murder-for-Hire’ federal criminal case so far, even though he was convicted for the crime on May 27, 2021 (i.e., it has been 18 months), the attorneys called the claims in the Complaint as “fantastical”.

(ix) Instead of telling how the federal prosecutors are going to ensure safety for me to present my ‘Victim Impact Statement’ during the ‘Sentencing Hearing’ in the ‘Murder-for-Hire’ case against Defendant BHOGIREDDY, the attorneys called the claims in

the Complaint as “fantastical”, as they do not want me to present the real impact of the crimes by Defendant BHOGIREDDY to me and my children, because they already covered up all the crimes during the trial in the District Court.

The above list shows how deeply the federal prosecutors led by US Attorney John R. Lausch and Assistant US Attorney Jason A. Julien, are involved in the coverup of serious crime, and bribery I reported to the Court. That was the reason why attorneys Lausch and Walsh filed the ‘Notice of No Brief’ with false information by concealing the truth and facts from this Court.

WHEREFORE, I request this Honorable Court, in the interest of justice and to safeguard the public trust and, the integrity of both the federal court system and the US Attorney’s Office in Chicago, to order or direct the District Court to order for investigation of the serious crimes, coverup and bribery by Defendants thoroughly to stop and address them, without any further delay.

Date: November 14, 2022

Respectfully submitted,

/s/ Usha Soujanya Karri

/s/ Karri Usha Soujanya

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APPENDIX AJ

* * *

court intervention in state-court's order or judgment or any adjudication of the ease in the state-court.

It was meant to stop the judges from further violation of my civil rights under color of law and to investigate the serious fraud, crime and bribery by judges, lawyers and court appointed experts, which were committed during the proceedings of the case, as I reported to the District Court.

There would be no real and fair trial in the state-court when one judge after another violates my civil rights under color of law without due process of law, along with the court appointed Guardian ad Litem Defendant WYPYCH and Defendant BUZINSKI on behalf of Defendant BHOGIREDDY to obstruct me from reporting the above crimes to the Court including the latest conspiracy to get me murdered in the cover of a fake 'Assessment for Zoom Parenting Time' for Defendant BHOGIREDDY while he is incarcerated in federal prison as he was already convicted for one of the related serious crimes for 'Murder-for-Hire'.

And the violation of my civil rights is continuing in the state-court even during the progress of this lawsuit in the federal court system,

Hence, the Order and the Judgment entered on May 3, 2022 and the Amended Judgment entered on August 11, 2022 should be reversed.

III. Alternatively, this Court Should Affirm the Dismissal for Failure to State a Claim Upon Which Relief Can be Granted

I disagree with the Defendants' argument.

As I already stated before in my 'Arguments V and VI' in my opening brief (**CCDkt. #14**, Opening Brief, at p.38 and 39), Defendants BOYLE, FIFE, BUZINSKI and BONZA along with Defendant BHOGIREDDY are liable for damages as they conspired with Defendants WALKER, YU, HARACZ and WYPYCH in depriving me of my civil rights under color of law without due process of law.

As I already stated before in my '**Argument IV**' in my opening brief (**CCDkt. #14**, Opening Brief, at p.17), Defendant WYPYCH along with Defendants WALKER, YU and HARACZ have no immunity against declaratory relief and for their criminal actions as they conspired with Defendant BHOGIREDDY along with other defendants to get me murdered.

And, I did not request the Court for any damages from Defendant WYPYCH.

A. Defendants Failed to Address and Support How The Court Orders They Obtained as Part of the Conspiracies to Get Me Murdered, were Lawful:

As I already stated in my "REPLY TO DEFENDANTS' STATEMENT OF THE CASE" on Page 3 of this brief, Defendants failed to provide any factual support

to refute or dispute my factual allegations, which were also associated with supporting evidence, about the conspiracies to get me murdered in which they participated along with Defendants WALKER, YU, HARCZ and BHOGIREDDY using fraudulent and unlawful Court Orders they created together.

Defendants failed to address and support how at least one of the Court Orders as of July 25, 2019 (**SA75-78**), September 3, 2019 (**SA79-80**), July 15, 2021 (**SA93**) and December 3, 2021 (**SA108-109**) were lawful, which were used as part of the conspiracies to get me murdered in which they participated along with Defendants WALKER, YU, HARACZ and BHOGIREDDY.

Defendants through their lawyers listed so many laws in their Joint Response Brief (**CCDkt. #23**, Response Brief). However, they did not follow a single law in obtaining the above court orders by conspiring with Judges Defendants WALKER, YU, HARACZ and BHOGIREDDY, as part of the conspiracy to get me murdered.

Even though the Defendants acknowledged multiple times that there were 192 pages and 363 paragraphs in the Second Amended Complaint (**Dkt. #44**), they failed to address directly and support that at least 1 page or at least 1 paragraph was false.

Even though the Defendants made empty statements without any substance that there are conclusory statements in the Complaint, they failed to address

directly and support which paragraph has conclusory statements without substance.

B. False Claims of 'Vague and Conclusory Statements' by Defendants:

The Defendants falsely claimed “the Second Amended Complaint in this case offered no more than “vague and conclusory allegations respecting the existence of a conspiracy” with public officials who are immune from liability” (**CCDkt. #23**, Response Brief, at p.27, 1st Paragraph), even though the conspiracies were presented in a very simple and plain English language in which the defendants are very proficient and knowledgeable in, in a Series of paragraphs in the Complaint (Dkt. #44) as listed below:

Conspiracy-1 by Defendants WALKER, WYPYCH, BUZINSKI, BOYLE, FIFE and BHOGIREDDY was listed in the Complaint from **Page 68 to 84 in 39 paragraphs**.

Conspiracy-2 by Defendants YU, HARACZ, WYPYCH, BUZINSKI, BONZA and BHOGIREDDY was listed in the Complaint from **Page 109 to 138 in 88 paragraphs**.

And the above actions were clearly listed in a ‘Table of Contents’ (**Table 2**) listed on Page 15 of the Complaint.

The conspiracies were also clearly explained along with the supporting evidence in my opening brief (**CCDkt. #14**, Opening Brief, at p.17-38).

As the defendants are very unhappy to address the bitter truth about the serious fraud and crime they committed using their lawyer license and psychologist license, and their access to the Court System and Judges, they are knowingly and blatantly making false statements that the above information listed in the Complaint is “Vague and Conclusory”.

No reasonable person with minimum common sense and minimum intelligence would believe that such information in so many pages and so many paragraphs in the Complaint, make up to be “Vague and Conclusory”.

C. Defendants Failed to Address Why Defendant BONZA Falsely Claimed that She was Conducting Child Custody Evaluation:

Defendants falsely claimed “There are no allegations concerning any agreement amongst any of the defendants, nor are there any allegations that support Plaintiffs leaps of logic (i.e., that by having her meet with a psychologist, issuing a subpoena, entering an agreed order, or changing the location of the minor’s preschool, the parties were working to have her murdered).” (CCDkt. #23, Response Brief, at p.27, 2nd Paragraph), even though all those allegations were already provided as part of the conspiracies listed in the Complaint as already stated above.

In the above claim, even though the Defendants admitted that they tried to have me meet the psychologist, Defendant BONZA, they failed to address why

and based on what law they tried to have me meet Defendant BONZA. The truth is that they tried to have me meet Defendant BONZA as part of the conspiracy to get me murdered in the cover of a fake 'Assessment for Zoom Parenting Time', in order to obstruct me from presenting my 'Victim Impact Statement' during the 'Sentencing Hearing' in the 'Murder-for-Hire federal criminal case against Defendant BHOGIREDDY, as I already explained along with the supporting evidence in my opening brief (**CCDkt. #14**, Opening Brief, at p.26-38).

However, in the 'Motion to Dismiss' that Defendant BONZA filed in the District Court, Defendant BONZA made a false claim that she was conducting 'Child Custody and Psychological Evaluation' instead of telling the truth, as I stated in my '**Argument VI**' (**CCDkt. #14**, Opening Brief, at p.39) that she was appointed by the Court to conduct a fake 'Assessment for Zoom Parenting Time'. Defendant BONZA made the false claims to the Court to cover up the serious fraud and crime she committed as part of the conspiracy as I already stated above.

D. Defendants Failed to Address Why They Changed the School of Minor Child While Defendant BHOGIREDDY was Planning to Get Me Murdered

In the same above claim, even though the Defendants admitted that they changed the location of the minor child's pre-school, they failed to address why and based on what law they changed the school.

The truth is that they changed the pre-school to a school, which was close to Defendant BHOGIREDDY's home to make sure that the children would be with him before the planned murder of me would happen, as part of the conspiracy to get me murdered as I already explained along with the supporting evidence in my opening brief (**CCDkt. #14**, Opening Brief, at p.17-26). And, the District Court already acknowledged that Defendant BHOGIREDDY wanted to get me murdered too (footnote on RA5), based on the 'Government's sentencing memo' in the 'Murder-for-Hire' case (SA1-12).

E. Agreement Among Defendants for the Conspiracies to Get Me Murdered:

The Defendants falsely contend "There are no allegations concerning any agreement amongst any of the defendants, nor are there any allegations that support Plaintiff's leaps of logic" (**CCDkt. #23**, Response Brief, at p.27, 2nd Paragraph), even though all those allegations and details were already provided as part of the conspiracies listed in the Complaint as I already stated above.

However, to clarify further, the high level details about the agreements among the Defendants for the Conspiracies to get me murdered were also provided along with the supporting evidence in my opening brief as listed below:

Conspiracy-1 by Defendants WALKER, WYPYCH, BUZINSKI, BOYLE, FIFE and BHOGIREDDY (**CCDkt. #14**, Opening Brief, at p.17-26).

In the above conspiracy, the fraudulent court orders, the emails and the acts to further the conspiracy are the proof of agreements like (1) The fraudulent proposed ‘Agreed Order’ prepared without me on July 18, 2019 to expand the parenting time and to change the pre-school of the minor child (**SA64-67**), (2) The fraudulent court order on July 25, 2019 created without me (**SA75-78**), (3) The act by Defendant BHOGIREDDY in August/September to change the pre-school of the minor child to a school close to his home using the above order, (4) The fraudulent court order on September 3, 2019 (**SA79-80**) to force me to send the child to the new school, (5) Defendant BHOGIREDDY bringing hitmen to Domestic Relations Court in the morning on October 2, 2019 and meeting another hitman in the same evening, before he was arrested with ‘Murder-for-Hire’ charges by federal agents on October 2, 2019.

Conspiracy-2 by Defendants YU, HARACZ, WYPYCH, BUZINSKI, BONZA and BHOGIREDDY (**CCDkt. #14**, Opening Brief, at p.26-38).

In the above conspiracy, the fraudulent court orders, emails and the acts to further the conspiracy are the proof of agreements like (1) Email by Defendant WYPYCH on July 12, 2021 about Defendant BONZA (**SA92**), (2) Fraudulent Court Order by Defendant YU on July 15, 2021 along with Defendants WYPYCH and BUZINSKI on behalf of Defendant BHOGIREDDY, an agreement and an act (**SA93**), (3) Email on August 12, 2021 related to Defendant BONZA asking me for ‘Informed Consent for Psychotherapy’ fraudulently (**SA95-96**), an act, (4) Proposed Court Order on August

13, 2021 (**SA99-100**) to force me to give consent to Defendant BONZA, an act, (5) Court Order on October 7, 2021 by Defendant HARACZ to help Defendant YU continue the crime (**SA103**), an agreement and an act, (6) Response filed by Defendants BUZINSKI and BHOGIREDDY on November 5, 2021 (**SA104-107**) to continue the assessment, an agreement and an act, (7) Defendant BHOGIREDDY got the 'Sentencing Hearing' canceled on November 12, 2021, to wait for execution of the conspiracy, (8) Fraudulent Court Order by Defendant YU on December 3, 2021 (**SA 108-109**), an act, (9) Email by Defendant WYPYCH to target me to force me to meet Defendant BONZA and she shielded her from providing information (**SA110-118**), an act, (10) Email by Defendant WYPYCH on January 5, 2021 indicating Defendant BHOGIREDDY dictating the assessment (**SA121**), (11) Email by Defendant WYPYCH on January 12, 2021 about unavailability of Defendant BONZA, to pause the conspiracy (**SA122**).

Hence, due to the above serious fraud and crime committed by the Defendants, the Order and the Judgment entered on May 3, 2022 and the Amended Judgment entered on August 11, 2022 should be reversed.

CONCLUSION

WHEREFORE, I request the Honorable Court to (1) reverse the Judgment and Order entered by the District Court on May 3, 2022, (2) reverse the Opinion and Order entered on June 6, 2022, denying my Motion to Alter or Amend a Judgment, (3) remand this case

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and (4) I also request the Honorable Court, in the interest of justice and to safeguard the public trust and the integrity of the federal court system, to order or direct the District Court to order for investigation of the serious crimes, coverup and bribery by Defendants thoroughly to stop and address them, without any further delay.

Date: November 14, 2022

Respectfully submitted,
