

ORIGINAL

No. 23-277

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SUPREME COURT, U.S.

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

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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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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 Ganiseti' 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 Opening Brief (CCDkt. #14, p.17) and in 'Argument III' in my Reply Brief (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 Opening Brief (**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 BHOGIREDDY 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,

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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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