POLICE CRIMINAL COMPLAINT COMMONWEALTH OF **PENNSYLVANIA** COMMONWEALTH OF PENNSYLVANIA COUNTY OF MONTGOMERY VS. Magisterial District Number: 38-01-25 DEFENDANT: (NAME and ADDRESS): JAMES GALLAGHER RAGHUNANDAN YANDAMURI MDJ: Hon. 128 WEST 4TH STREET Middle Name Last Name First Name Address: 251 W DEKALB PK **APT B610 BRIDGEPORT PA 19405** KING OF PRUSSIA PA 19406 (610) 277-3377 Telephone: NCIC Extradition Code Type ☐ 1-Felony Full ☐ 4-Felony No Ext ☐ B-Misdemeanor Limited ☐ E-Misdemeanor Pending 2-Felony Ltd. ☐ 5-Felony Pend. □ C-Misdemeanor Surrounding States ☐ Distance: ☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ D-Misdemeanor No Extradition DEFENDANT IDENTIFICATION INFORMATION **Docket Number** Date Filed OTN/LiveScan Number Complaint/Incident Number Request Lab Services? 10/26/12 L741988-2 PD-12-19552 40260790 ▼ YES □ NO GENDER DOB POB Add'I DOB 02/21/1986 Co-Defendant(s) INDIA |x| Male First Name Middle Name Last Name Gen. AKA ☐ Female RACE ☐ White Asian □ Black ☐ Native American □ Unknown ETHNICITY ☐ Hispanic Non-Hispanic ☐ Unknown ☐ GRY (Gray) HAIR COLOR ☐ RED (Red/Aubn.) ☐ SDY (Sandy) ☐ BLU (Blue) ☐ PLE (Purple) ☐ BRO (Brown) BLK (Black) ☐ ONG (Orange) ☐ WHI (White) ☐ XXX (Unk/Bald) ☐ PNK (Pink) ☐ GRN (Green) ☐ BLN (Blonde / Strawberry) **EYE COLOR** ☐ BLK (Black) ☐ BLU (Blue) BRO (Brown ☐ GRN (Green) ☐ GRY (Gray) ☐ HAZ (Hazel) ☐ PNK (Pink) ☐ MAR (Maroon) ☐ XXX (Unknown) **Driver License** IL Y53572086052 State License Number Expires: WEIGHT (Lbs.) DNA ☐ YES ☐ NO **DNA Location** 160 FBI Number MNU Number Ft. HEIGHT In. 5 Defendant Fingerprinted: ¥ YES ☐ NO 9 Fingerprint Classification: **DEFENDANT VEHICLE INFORMATION** Plate # State Registration Sticker (MM/YY) Oth. NCIC Hazmat Comm'l Veh. School Reg. Ind. Veh. Veh. Code JBK2136 PA П П same VIN Year Model Style Color as Def. 19UUA5643XA003888 1999 **ACUR** INT RED П Office of the attorney for the Commonwealth 🗵 Approved 🗆 Disapproved Because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth Prior to filing. See Pa.R.Crim.P. 507). District Attorney Risa Vetri Ferman (Name of the attorney for the Commonwealth-Please Print or Type) (Signature of the attorney for the Commonwealth) **DET P BRADBURY & DET A RATHFON** 49 & 36 (Name of the Affiant-Please Print or Type) PSP/MPOETC -Assigned Affiant ID Number and Badge # of UPPER MERION TOWNSHIP POLICE PA0462900 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box)

(County Code)



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number	
	10/26/2012	L741988-2	PD-12-19552	
Defendant Name	First:	Middle:	Last:	
	RAGHUNAND)AN	YANDAMURI	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

Inchoate Attempt Offense 18 901 A	3		Solicitation 18 902 A				Conspiracy 8 903		
2502	(a)	of the	PA Crimes Code		Ozada	NOIO Off	- 0 - 1 -	LICE/AUDDS (No do
Chones is dedican	Subsection		PA Statute (Title	e) Counts	Grade	NCIC Offens	e Code	UCR/NIBRS (ode
PennDOT Data Accider (if Applicable) Number					Safety Zon	е	į.	Work Zone	
Statute Description (In MURDER	Statute Description (Include the Name of the Statute or Ordinance): MURDER								
Acts of the accused associated with this Offense: PACC 2502(a) Murder of the first degree									
Inchoate Offense Attempt 18 901 A			Solicitation 18 902 A				onspiracy 8 903		
2502	(b)	of the	PA Crimes Code	0.000					
Lead? Offense # Section	Subsection		PA Statute (Title	e) Counts	Grade	NCIC Offens	e Code	UCR/NIBRS C	Code
PennDOT Data Accider (if Applicable) Number					Safety Zone	е		Work Zone	
Statute Description (In MURDER	clude the Name	e of the S	Statute or Ordinan	nce):					
Acts of the accused a PACC 2502(b) Murde									
Inchoate Offense Attempt 18 901 A			Solicitation 18 902 A				onspiracy 8 903		
2901	(a)(1)	of the	PA Crimes Code		F1			26	100
Lead? Offense # Section	Subsection		PA Statute (Title	e) Counts	Grade	NCIC Offens	e Code	UCR/NIBRS C	Code
PennDOT Data Accider (if Applicable) Number					Safety Zone	9		Work Zone	
Statute Description (Include the Name of the Statute or Ordinance): KIDNAP INT/FACIL/FELONY									
Acts of the accused associated with this Offense: PACC 2901(a)(1) Kidnapping - F1									



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number		
	10/26/2012	L741988-2	PD-12-19552		
Defendant Name	First: RAGHUNANE	Middle:	Last: YANDAMURI		

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

Inchoate Offense Attempt 18 901 A	*	Solicitation 18 902 A			1 1 1	Conspiracy 18 903		
2901	(a) (2) of the	PA CRIMES CODE	1	F1				
Lead? Offense # Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offens	se Code	UCR/NIBRS	Code
PennDOT Data Accident (if Applicable) Number				Safety Zone			Work Zone	
Statute Description (Include the Name of the Statute or Ordinance): KIDNAPPING								
Acts of the accused as PACC 2901 (a)(2) Kidn		Offense:						
Inchoate Offense Attempt 18 901 A		Solicitation 18 902 A			1 1 1	Conspiracy 18 903		
Lead? Offense # Section	(a)(3) of the		1	F1			26	100
Lead? Offense # Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offens	se Code	UCR/NIBRS	Code
PennDOT Data Accident (if Applicable) Number			s	Safety Zone			Work Zone	
Statute Description (Inc		Statute or Ordinance	e):					
Acts of the accused as PACC 2901(a)(3) Kidna		Offense:						
Inchoate Offense Attempt 18 901 A		Solicitation 18 902 A			1 1 1	onspiracy 8 903		
3502	(a) of the		1	F1			05	220
Lead? Offense # Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offens	e Code	UCR/NIBRS	Code
PennDOT Data Accident (if Applicable) Number			s	afety Zone			Work Zone	
Statute Description (Include the Name of the Statute or Ordinance): BURGLARY								
Acts of the accused as PACC 3502(a) Burglar		Offense:						



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number	
	10/26/2012	L741988-2	PD-12-19552	
Defendant Name	First:	Middle:	Last:	
	RAGHUNANDA	AN .	YANDAMURI	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

Inchoate Offense Attempt 18 901 A	Solicitation 18 902 A			Conspi 18 903	racy	
3701 (a)(1)(i) of the	PA Crimes Code	1	F1		03	120
Lead? Offense # Section Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Co	de UCR/NIBRS	Code
PennDOT Data Accident (if Applicable) Number			Safety Zon	э	Work Zone	
Statute Description (Include the Name of the Statute or Ordinance): ROBBERY/SERIOUS BOD INJ						
Acts of the accused associated with this O	ffense:					
PACC 3701(a)(1)(i) Robbery - F1						
Trice or or (u)(1)(1) Respecty 11						
Inchoate Attempt	Solicitation			Conspi	racy	
Offense 18 901 A	18 902 A			18 903		
3701 (a)(1)(ii) of the	PA Crimes Code	1	F1		03	120
Lead? Offense # Section Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Co	de UCR/NIBRS	Code
PennDOT Data Accident (if Applicable) Number			Safety Zone	•	Work Zone	
Statute Description (Include the Name of the S ROBBERY/THREAT SER INJ	Statute or Ordinance):				
Acts of the accused associated with this O PACC 3701(a)(1)(ii) Robbery - F1	ffense:					
Inchoate Attempt	Solicitation			Conspir	racy	
Offense 18 901 A	18 902 A			18 903		
3701 (a)(1)(iii) of the	PA Crimes Codes	1	F1		03	120
Lead? Offense # Section Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Cod	de UCR/NIBRS	Code
PennDOT Data Accident (if Applicable) Number			Safety Zone)	Work Zone	
Statute Description (Include the Name of the Statute or Ordinance): ROBBERY						
Acts of the accused associated with this Offense: PACC 3701(a)(1)(iii) - commits or threatens immediately to commit any felony of the first or second degree - F1						



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
	10/26/2012	L741988-2	PD-12-19552
Defendant Name	First:	Middle:	Last:
	RAGHUNAND	DAN	YANDAMURI

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

Inchoate Offense	Attempt 18 901 A			Solicitation 18 902 A		2	111	Conspiracy 8 903		
	3921	(a)	of the	PA Crimes Code	1	F3			06	23A
Lead? Offen:	se # Section	Subsection	***	PA Statute (Title)	Counts	Grade	NCIC Offens	se Code	UCR/NIBRS	Code
PennDOT Da (if Applicable						Safety Zon	е		Work Zone	
	Statute Description (Include the Name of the Statute or Ordinance): THEFT BY UNLAWFUL TAKING OR DISPOSITION									
Acts of the accused associated with this Offense: PACC 3921(a) - Movable Property - A person is guilty of theft if he unlawfully takes, or exercises unlawful control over, movable property of another with intent to deprive him thereof F3 Inchoate Attempt Solicitation Conspiracy										
Offense	18 901 A			18 902 A			1 1 1	8 903		
	5510		of the	PA CRIMES CODE	1	M2				
Lead? Offens	se # Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offens	e Code	UCR/NIBRS	Code
PennDOT Da	1100/00/11					Safety Zone	e .		Work Zone	
Statute Description (Include the Name of the Statute or Ordinance): ABUSE OF CORPSE										
	e accused as O Abuse of C	sociated with	n this O	ffense:						

CONFIDENTIAL



Confidential Information Form Criminal Complaint

Complete the defendant's SSN Information if known. If this form is submitted as part of a Criminal Complaint, the NCIC Cautions/Medical Conditions and Scars/Marks/Tattoos should also be completed if known.

Docket Number:	Date Filed: 10/26/2012	OTN/LiveScan Number L741988-2	Complaint/Incident i	Number PD-12-19552
Defendant Name	First: RAGHUNAND	Middle:	Last:	YANDAMURI
		NCIC Cautions and Medical Condition	ons (Check up to 9)	
□ 00	□ 20	□ 50	□ 70	□ 01
□ 05	□ 25	□ 55	□ 80	
□ 10	□ 30	□ 60	□ 85	
□ 15	□ 40	□ 65	□ 90	
Scars, Marks, Tattoos NCIC Codes	Sec. 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2			
		Confidential Informat	ion	
Name: YANDAMURI, RAGHUNANDAN		Social	Security Number: 348-0	6-4051
Defendant Other:		Finance Finance	cial Information:	

AFFIDAVIT OF PROBABLE CAUSE

On Monday, October 22, 2012 at 1:14 PM officers from the Upper Merion Township Police Department responded to Marquis Apartments, 251 W. Dekalb Pike, Apt. C-603, Upper Merion Township, Montgomery County. The officers were responding to a 911 call in which 41 year old Venkata Venna reported his mother dead in the apartment.

Upon their arrival at the scene, Officers Brian Hill and Richard Hiller discovered the lifeless body of the 61 year old female victim, Satyavathi Venna. Satyavathi was lying in the kitchen of the apartment. A large amount of blood was present around her. A massive wound to her neck was apparent.

As the responding officers made contact with Venkata, they observed him washing his hands at the kitchen sink. In speaking with Venkata, they learned his 10 month old daughter, Saavni Venna, was missing from the apartment. Investigators learned Venkata and his 35 year old wife, Chenchu Latha Punuru, departed for work earlier in the day and left their daughter in the care of her paternal grandmother, Satyavathi.

Officers searched the apartment and confirmed the child was missing. Police secured the scene and a joint investigation into the homicide and child abduction was initiated by the Upper Merion Township Police, the Montgomery County Detective Bureau, and the Federal Bureau of Investigation. Based upon a request by the Upper Merion Township Police, the Pennsylvania State Police issued an Amber Child Abduction Alert.

The Amber Alert utilized media outlets to provide pertinent information about Saavni and her abduction to the public. This is a standard, first-line police response to such a child abduction. The purpose of the Amber Alert is to notify as many people as possible about the missing child.

As the officers secured the scene, Venkata pointed out the presence of papers lying on the floor feet from the body of Satyavathi. Venkata told Officer Hiller that the papers looked like a ransom note.

Investigators determined there were ten identical copies of a note which appeared to have been typewritten on a computer. The note was one page in length and written in "bullet point" fashion. Each note was printed on plain white paper. A copy of that note is attached to this affidavit of probable case. It has been marked "Exhibit A".

On Tuesday, October 23, 2012 at 7:30 AM Dr. Paul Hoyer, a forensic pathologist, performed an autopsy on the body of Satyavathi Venna. Dr. Hoyer determined the cause of death was incised wounds of the neck and chest. Dr. Hoyer identified multiple stab wounds to Satyavathi's upper chest and a horizontal, gaping neck wound. The neck wound was so deep it severed major arteries, her trachea and cut into her vertebrae. Dr. Hoyer also noted defensive injury on the victim's left hand. Dr. Hoyer opined the manner of death was homicide.

On Monday October 22, 2012 at 2:36 PM Venkata Venna was interviewed by Upper Merion Detective Constance Marinello and Montgomery County Detective Christopher Kuklentz. Venkata described the events of his day for the investigators. He said he and Chenchu departed their apartment together at 8:10 AM for their individual employers. Both left in their own cars. Venkata works closer to home in Malvern, Chester County. Chenchu works in the Fort Washington area of Montgomery County. Venkata departed and picked up a friend, Buela Korukonda, who also resides in the Marquis Apartments and also works for the same company.

Venkata reported receiving a phone call from Chenchu around noon. During this call, Chenchu reported that she had tried to call home to check on the baby and she was not able to reach Satyavathi by phone at the apartment. Venkata then made attempts to phone his mother at the apartment. His calls also went unanswered. Venkata contacted a friend to see if he could check on the well-being of his mother. He contacted Buela's husband, Gopi Kothapalli, and asked if Gopi was presently at the Marquis Apartments. Venkata said he planned to ask Gopi to check on his mother but Gopi said he was not at the apartment complex. Venkata decided to drive to his apartment to check on the situation.

Venkata estimated he departed his employer's facility for his home at 12:45 PM. During this drive he phoned his sister, Sujatha Venna, in India to inquire whether she had spoken to their mother recently. India is the native country of all of those mentioned in this affidavit. Sujatha told Venkata she had not been in contact with their mother.

While Venkata was on the phone, he arrived at his apartment door. Venkata said when he arrived at Apt. C-603 he used his key to enter the apartment. Immediately apparent in the kitchen, just feet from the entry door, Venkata saw his mother lying on the kitchen floor. Venkata touched his mother in an attempt to arouse her. He sprinkled water on her face and noted she was unconscious. He immediately called 911. The 911 operator gave Venkata instructions for performing CPR which he attempted to follow. Not immediately seeing his baby daughter, he then began to search throughout the apartment for her. He searched the entire apartment. Saanvi was gone.

Venkata reported he, his wife and his mother had no known problems with others. He reported no problems between members of the family. He knew of no enemies to any of the family members. He reported he was financially

stable, but did not possess the ability to pay the \$50,000 the ransom note requested for the return of Saavni.

On Monday, October 22, 2012 at 3:31 PM Chenchu Punuru was interviewed by Upper Merion Detective Andrew Rathfon and Montgomery County Detective Paul Bradbury. Chenchu provided a detailed history of her day on October 22, 2012. She reported leaving the Marquis Apartments with Venkata between 8:00 and 8:15 AM. She then drove from her apartment complex to Fort Washington. At 12:03 PM Chenchu phoned her home phone number and received no answer. She tried multiple times and received no answer. She then contacted Venkata. After discussing it with Venkata she tried again to phone the home and received no answer. She then learned from Venkata that he was on his way to the home to check the situation.

Chenchu also reported no problems in the family. She was unable to provide investigators with anyone who may want to do harm to her mother-in-law, her daughter or her family.

Upon reviewing the ransom note, investigators noted the author of the note required the \$50,000 to be delivered by "lata" to the "baha fresh at the acme store complex". A Baha Fresh restaurant exists across from the Marquis Apartments at 340 W. Dekalb Pike, Upper Merion Township.

Investigators determined "lata" is a reference to Chenchu. Chenchu is sometimes called "Latha" by members of her family or by Indian people with whom she is close.

The first word in the ransom note is "shiva". During his interview,

Venkata told investigators his full given Indian name is Venkata Konda Siva

Prasad Venna. His middle name, "Siva", is a name which only close family and

friends use for him. Because the note's first word is "shiva", it appears as if it is written to the attention of Venkata.

On the night of Monday, October 22, 2012 members of the investigating agencies established surveillance on the Baja Fresh restaurant and the shopping complex in which it is located. Chenchu was directed by law enforcement officials to the location identified and waited alone, while under discreet surveillance, for someone to approach her. No one approached Chenchu. Surveillance officers did not observe any suspicious behavior or individual.

Both Chenchu and Venkata were asked to provide a list of people who had knowledge of the "Siva" and "Latha" names. Each provided a list of Indian natives who either used or were aware of the use of these nicknames. Among the names provided by the couple was a man by the name of "Ragu". Investigators determined his given name was Raghunandan Yandamuri.

After their initial interviews Chenchu and Venkata agreed to remain in the company of members of the investigation team both to provide as much information as possible to help locate their child and to allow law enforcement to monitor any communication made by the kidnapper.

On Thursday, October 25, 2012 Detectives Rathfon and Bradbury interviewed Raghunanan "Ragu" Yandamuri. Initially, Ragu told the detectives that he had no idea who had killed Satyavathi or taken Saanvi. He reported creating a missing child poster with two pictures of Saanvi, printing 150-200 copies at work and delivering them to the family for distribution. He also reported distributing them around the community. He told police he visited the family at the Police Department to offer help and support. He attended the vigil held Wednesday night to support the family.

Later in the interview, Ragu admitted he was lying to the detectives and he admitted he was responsible for the deaths of both Satyavathi and Saanvi. He told the detectives that he planned to kidnap Saanvi and hold her for ransom. Ragu told the detectives he planned his trip to Apartment C-603 on Monday morning, October 22, 2012. He targeted the apartment of Venkata and Chenchu because he believed they had money because they both were employed. He described going to work on Monday and using his work computer to prepare a note demanding money from the Vennas. He said he printed copies of the note on his work computer and took them to the Venna's apartment. He stated it was his intention to take Saanvi and hide her until her parents paid the ransom.

Ragu estimated he arrived at Apartment C-603 at about 11:00 AM on Monday morning. He brought with him a kitchen knife which had a four inch blade. He armed himself with this knife from his own kitchen before heading to Apartment C-603. He brought ten copies of the ransom note he had prepared in advance.

Ragu described what happened when he arrived at Apartment C-603. He knocked at the door. He said it was answered by Satyavathi. Once she opened the door for him, Ragu threatened her with the knife. Satyavathi retreated into the kitchen area of the apartment. Ragu saw Saanvi sitting on the couch and he picked her up. As Ragu held Saanvi in his left arm he said Satyavathi came at him while in the kitchen. During this time Ragu remained armed, holding his knife in his right hand. According to Ragu, Saanvi fell from his grip and he fell on top of her. He claimed that as he was falling to the ground, Satyavathi came towards him and that was the moment when she was cut in the throat.

Ragu said Saanvi began to cry and he stuffed a handkerchief in her mouth her to make her stop crying and placed a bath towel around her head to hold the handkerchief in place. He then put her inside a blue suitcase he found in the bedroom. He took jewelry he found in the apartment and placed that inside the suitcase with Saanvi. He then left Apartment C-603. He described how he abandoned Saanvi's body hidden inside the steam room, of the men's bathroom, of the gymnasium located inside Marquis Apartment Building A.

Ragu told investigators he dumped the knife, some of his clothes and the blue suitcase into a dumpster in another part of Upper Merion Township. He disposed of some of the stolen jewelry in the Schuylkill River and said he left some at his place of employment. Ragu asked detectives upon completion of the interview, to tell the media that his wife turned him in so she would could get the "thirty grand".

Following his description, investigators went to the men's locker room in the gymnasium at the Marquis Apartment A-Building. Hidden inside a dark wooden sauna under a deep bench, they found the lifeless body of Saanvi Venna. There was apparent blood on her white dress.

Based upon the above facts, your affiant respectfully requests an arrest warrant be issued for Raghunanan "Ragu" Yandamuri, charging him with murder and the related offenses enumerated on the attached criminal complaint.

Detective Andrew Rathfon Upper Merion Township Police	Date	
Detective Paul Bradbury	Data	
Montgomery County Detective Bureau	Date	
Magisterial District Judge	Date	

shive your daughter has been kidnapped
if you report this to cops your daughter will be cut into pieces
and found dead
if you inform this to anyone you will find your daughter body
parts thrown into your apartments
our prople are monitoring all your moves all the time your
emails & phones are being traced

instructions carefully
we want \$50,000.00 by end of the day.
your wife lata have to bring money to the location alone
if we see you or your wife accompanied with (or) informed to
anyone (cop/human), you will find your daughter dead. This is
very serious.

Its up to you to decide, you want your lyr old daughter or 5months of your income.

By 8PM today, lata alone should get \$50,000.00 cash and come to baha fresh at acme store complex.

once our person receives money from her at baha fresh, we will call you and tell the address where to pick your baby from Any cunning act from anyone of you will lead to your daughter's death.

Be prepared by 8PM today with cash.
we dont want any excuses. Remember that your baby is starving since morning

Exhibit "A"



LOCAL ARRESTEE Database Printed Upper Merion Twp PD: 10/26/2012 10:55