

3

United States District Court

EASTERN

DISTRICT OF

MICHIGAN - SD

UNITED STATES OF AMERICA

V.

LAKSHMINIVASA RAO NERUSU

CRIMINAL COMPLAINT

Case:2:08-mj-30475

C Judge: Unassigned,

Filed: 11-05-2008 At 01:54 PM

USA V. NERUSU (ml)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about October 14, 2008 in Oakland county, in the Eastern District of

Michigan defendant(s) did, (Trace Statutory Language of Offense)

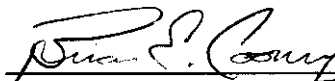
knowingly, willfully and unlawfully move and travel in interstate commerce; to wit: from Michigan to India with the intent purpose of avoiding prosecution on three charges of First Degree Murder, all of which are felonies under the State of Michigan.

in violation of Title 18 United States Code, Section(s) 1073.

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:
Official Title

See attached affidavit

Continued on the attached sheet and made a part hereof: Yes No



Signature of Complainant
Brian E. Cooney, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

November 05, 2008

Date

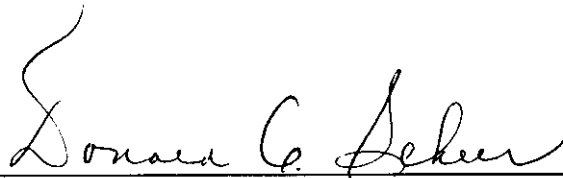
at Detroit, Michigan

City and State

DONALD A. SCHEER

United States Magistrate Judge

Name & Title of Judicial Officer



Signature of Judicial Officer


AFFIDAVIT

Special Agent Brian E. Cooney, Federal Bureau of Investigation, after being duly sworn, deposes and says the following:

1. On October 31, 2008, a warrant was issued in 52/1 District Court, Oakland County, Novi, Michigan, charging Lakshminivasa Rao Nerusu, defendant herein, with Three Counts of Homicide - Murder First Degree - Premeditated, which are felonies under the laws of the State of Michigan. The Novi Police Department (NPD) is currently holding a valid warrant for the arrest of the defendant on the charges stated above based on the alleged crimes.
2. On November 4, 2008, the Office of the Prosecuting Attorney, Oakland County, Pontiac, Michigan, requested assistance from the Federal Bureau of Investigation, in effort to locate and apprehend the defendant based on the recommendation of the Novi Police Department.
3. Investigation conducted by the NPD has revealed that on October 13, 2008, the defendant allegedly murdered his wife, Jayalashmi Nerusu, his daughter, Tejasvi Nerusu, and his son, Siva Nerusu, in their apartment located at 29567 Wharton Court, Novi, Michigan 48375.
4. Further investigation conducted by NPD has developed information that the defendant used cash to purchase a one way flight to India on October 13, 2008 with the intent and purpose of avoiding prosecution on charges of the alleged crime. The defendant departed Detroit Metro Airport on Lufthansa Flight 443 at 3:50 pm on October 14, 2008 for Frankfurt Germany arriving at 5:55 am. The defendant then departed Frankfurt Germany on Lufthansa Flight 752 at 11:00 am

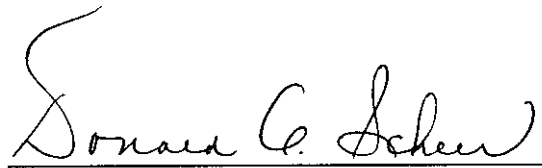
on October 15, 2008 for Hyderabad, India arriving at 11:15 pm. This matter has received media attention in the Detroit Metropolitan area as well as in India and to date, the defendant continues to remain in a wanted status.

5. The above is known to the undersigned to be true through reliable information obtained from results of investigation conducted by the Novi Police Department and the affiant.



Brian E. Cooney, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in
my presence this 5 day of November 2008



United States Magistrate Judge