

FILED  
IN CLERKS OFFICE  
Civil Action No  
UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
Friedrich Lu, Plaintiff

v

F Dennis Saylor IV, Jon David Levin, Patti B Saris, Lance E Walker, Karen Frink Wolf, Denise J Casper, Indira Talwani, Leo T Sorokin, Allison D Burroughs, Senior District Judges William G Young, Mark L Wolf, George A O'Toole Jr, Marianne B Bowler, Judith G Dein, Jennifer C Boal, David J Barron, Sandra L Lynch, O Rogeriee Thompson, William J Kayatta Jr, Bruce M Selya, Kermit V Lipez, Jeffrey R Howard, Timothy J Harrington, Kimberly S Budd, and Serge Georges Jr, Defendant

COMPLAINT

- (1) The court has subject matter jurisdiction over this matter under 28 USC § 1331.
- (2) Judicial officer defendants have, for more than a decade, deprived Friedrich Lu's day in court, including *any* discovery), compounding injuries in his business (lawsuits) or property perpetuated by Lu's adversaries.
  - (a)
    - (i) Count One: 18 USC § 1962(d) (RICO conspiracy; applicable to all defendants in this paragraph, ¶ (2) ).
    - (ii) Count Two: 28 USC § 2201 (Declaratory Judgment Act). Declaratory judgment is sought that all judicial officer defendants have sinned, in violation of racketeering Influenced and Corrupt Organizations Act (RICO) of 1970.
    - (iii) In effect acting in concert as one, the three enterprises are United States District Court for the District of Maine, United States District Court for the District of Massachusetts, and United States Court of Appeals for the First Circuit (the last is in interstate commerce).
    - (iv)
      - (A) Chief Judge Jon David Levin, District Judge Lance E Walker, and Magistrate Judge Karen Frink Wolf make up the first enterprise.
      - (B) The second enterprise comprises at least Chief Judge F Dennis Saylor IV; District Judges Patti B Saris, Denise J Casper, Indira Talwani, Leo T Sorokin, Allison D Burroughs; Senior

District Judges William G Young, Mark L Wolf, George A O'Toole Jr; Magistrate Judges Marianne B Bowler, Judith G Dein, and Jennifer C Boal .

(C) At minimum, Chief Circuit Judge David J Barron; Circuit Judges Sandra L Lynch, O Rogeriee Thompson, William J Kayatta Jr; Senior Circuit Judges Bruce M Selya, Kermit V Lipez, and Jeffrey R Howard compose the third enterprise.

(b) Lu's first federal lawsuit named a certain attorney to corrupt state court, who later married Lynch. Lynch ignored Lu's motion to recuse. In fact, many of the above judges turned a blind eye to Lu's motions for the same. These defendants have also concealed their conflict of interests. Absent discovery, Lu is unable to obtain evidence in their supposed bribery on which to build grievances of honest service mail fraud.

(c) Upon learning of the Oct 26, 2020 death of Circuit Judge Juan R Torruella months after the fact, Lu cursed, "Good riddance!"

(d)

(i) Complaint in *Lu v Budd*, US Dist Ct (D.Mass.) No 21-cv-10352 accused Lu's opponents in a previous lawsuit of colluding with Saris. The case was assigned to Saris no less, who hen prevailed on Chief Judge Saylor to assign the case to himself and kill it. Saylor did just that.

(ii) *Lu v Laprocina*, US Dist Ct (D.Mass.) No 21-cv-11493.

(A) Before or on Oct 5, 2021 Saylor and Levy forged Howard's signature and order to assign Levy to that case.

(B) On Apr 1, 2022 Levy swore in Karen Frink Wolf. Before or soon after, the magistrate judge either joined, or agreed to aid and abet, the conspiracy with (her) commission of overt acts: an Apr 19, 2022 hearing and a same-day report and recommendation, the latter of which Levy adopted and entered a purported order of dismissal of case -- *all* from Maine.

(C) Perhaps to fend off exposure to mail or <sup>wire</sup> ~~electronic~~ fraud, Levy and said magistrate judge, from the get-go, does not treat Lu as a party, never having *text*, if any, of any order or ruling sent (by mail or electronically) to Lu (as opposed to its *title*, which Lu did receive electronically), starting with (text of) the forged order. Nor does Lu perceive the duo as judges of his case.

(iii) The above shed light on a previous forgery of the same, by Saris (then chief judge) and Walker in *Lu v Sprague*, US Dist Ct (D.Mass.) No 18-cv-12544 to appoint to that case Walker, who, from Maine, entered a series of rapid-fire rulings that ended with a purported order of dismissal of case, none of which were mailed to Lu. Indeed, Saris imparted the know-how of such forgery to Saylor and Levy.

(iv) Levy, Saylor, Karen Frink Wolf, Saris and Walker each are said to be liable for two acts:

(A) forgery of the respective assignment orders, and

(B) the consequent presiding over two cases of Lu's by Levy, Karen Frink Wolf, and Walker.

(v)

(A) Count Three: 18 USC § 1962(d) (applicable to defendants named in ¶ (2)(b)(iv); tort, for *damage*).

(B) Count four: Fraud under Massachusetts common law (same).

(C) Count Five: Civil conspiracy under Massachusetts common law (same).

(3) Count Six: 18 USC § 1962(d) (applicable to all civilian defendants below; predicate act is 1503 (obstruction of justice) ).

(a) In *Lu v Niles*, US Dist Ct (D.Mass.) No 16-cv-12220, Attorney Timothy J Harrington colluded with Saylor. Lu was unaware of collusion or injury until Saylor presided over a second case in 2019.

(b) In *Lu v Budd*, Kimberly S Budd and Serge Georges Jr colluded with Saylor.

Plaintiff: Friedrich Lu, pro se Date: July 7, 2022

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