

**IN THE SUPREME COURT OF THE UNITED STATES**

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**In re Richard Arjun Kaul, MD  
Petitioner**

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**On Petition for a Writ of Prohibition to the U.S. District  
Court for the District of New Jersey in Case No. 21-CV-  
10363 – FLW - TJB  
Richard Arjun Kaul, MD v. Philip Murphy et al.**

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**PETITION FOR WRIT OF PROHIBITION**

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**Richard Arjun Kaul, MD**

**Propria Persona**

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**Dated: July 25, 2021**

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## The Kaul Cases

**K1: Kaul v Christie: 16-CV-02364 -VOLUNTARILY DISMISSED**

**K2: Kaul v Christie: 18-CV-08086 – VOLUNTARILY DISMISSED**

**K3: Kaul v Schumer: 19-CV-13477 – VOLUNTARILY DISMISSED**

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**K10: Kaul v Plaintiffs (All cases filed by Kaul to reverse judgments/verdicts entered from 1999 to 2015 in the UK/US).**

**K11-1: Kaul v Federation: 21-CV-00057 – OPEN**

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**K11-7: Kaul v Federation/New York State Medical Board/Allstate: Pending filing**

**K11-9: Kaul v Murphy: 21-CV-13063 – DISMISSED WITHOUT PREJUDICE AFTER TRANSFER FROM USDC-SDNY TO DNJ**

**P1: Kaul/Patel v Crist/State of New Jersey: 19-CV-08946 - CLOSED**

**P2: Kaul/Patel v Crist/Allstate: 19-CV-09232 - CLOSED**

## Legal Standard of Review

**All Writs Act 28 U.S.C. § 1651 - Writ of Prohibition**

**United States v. Hoffman, 71 U.S. 4 Wall. 158 158 (1866)**

**Larocca v Lane, 37 N.Y.2d 575**

### Related British/House of Lords jurisprudence:

**R v Bow Street Metropolitan Stipendiary Magistrate Ex parte Pinochet Ugarte (No.2) (1999).**

## **Parties to The Proceeding**

**Richard Arjun Kaul, MD is the Petitioner in this action. The Respondents are: (1) Philip Murphy; (2) Christopher J. Christie; (3) Gurbir Grewal; (4) Robert McGuire; (5) Doreen Annette Hafner.**

## **Relief Sought**

**Petitioner, RICHARD ARJUN KAUL, MD (“Kaul”) seeks an order from this Court to the United States District Court for the District of New Jersey, that prohibits all judges from any participation/involvement to any degree in any aspect of Kaul v Murphy: 21-CV-13063, and assigns the case to any district court, outside of the Third Circuit.**

## Issue/Question Presented

Commencing on April 2, 2012, Kaul's fundamental human rights under both international and American law have been egregiously violated by administrative/state/bankruptcy/federal courts within the geographic boundaries of the State of New Jersey. Kaul's constitutionally protected right to life, liberty and property have been, and continue to be violated by, amongst others, judges within the United States District Court for the District of New Jersey. The injuries caused by this decade of violations, one conducted by and within courts located in the State of New Jersey, are detailed in Appendix A.

**Question:** In continuing to violate Kaul's fundamental and constitutional human rights, does the law strip the judges and the District of New Jersey of their jurisdiction and authority.



## **Statement + Facts Necessary to Understand Petition**

The decade-long violation of Kaul's fundamental human and constitutional rights by The Kaul Cases Defendants has caused loss of life, liberty and property. The violation has been malicious, willfully purposed to destroy Kaul (jail/deportation/death) and is ongoing. The Defendants perpetration of this scheme was only made possible by the collusion/conspiracy of administrative/state/bankruptcy/federal/appellate courts within the State of New Jersey and the Third District of the United States District Court. One of the principal motivations for the corruption of the District of New Jersey and the U.S.C.A. for the Third Circuit, is the fact that Defendants Allstate/TD/Geico (Berkshire Hathaway) have knowingly violated, and continue to violate, the Sarbanes-Oxley Act. The risk to these Defendants of a criminal investigation for judicial corruption is far outweighed by the immense and uncontrollable risk of the corporate decimation that would definitively follow any legal/regulatory/shareholder action, and its attendant publicity, consequent to the Defendants ongoing fraud on the US securities market.

The following evidence constitutes a "substantial claim" and provides "ancillary" factors. See Larocca v Lane, 37 N.Y.2d 575, that comport with principles applied in granting a writ of prohibition, one of which is that where a petitioner submits an arguable, substantial, and novel claim that

a court [had] exceeded its powers because of a collision of unquestioned constitutional principles, he may, in the first instance, seek redress by prohibition. See 37 N.Y.2d at 581, 338 N.E.2d at 611, 376 N.Y.S.2d at 99. An analysis of the “ancillary” factors involves a consideration of: (i) the gravity of the harm caused by the excessive power – if the District of New Jersey/U.S.C.A. – Third Circuit were permitted to adjudicate K11-9, Kaul would forever be deprived of his right to vindicate his violated Constitutional rights; (ii) the availability or unavailability of an adequate remedy on appeal, at law, or inequity – the Defendants have corrupted the judicial apparatus within the U.S.C.A. for the Third Circuit, and many of the judges within this circuit have political/economic/personal/professional connections to The Kaul Cases Defendants, and the evidence proves they are substantially conflicted. Thus, Kaul is foreclosed from procuring any remedy to the deprivation of his rights, on appeal, at law or in equity; (iii) the remedial effectiveness of prohibition if such an adequate remedy does not exist – a writ of prohibition is the only remedy to attempt to prevent any further violation of Kaul’s rights. The “substantial” and “ancillary” factors submitted by Kaul, and as interpreted by the prevailing law, do substantiate the issuance of writ of prohibition to the judges within the District of New Jersey.

## **Standard of Review/Legal Authority for grant of writ**

**28 U.S.C. § 1651**

**28 U.S.C. § 2241: This petition constitutes an element of Kaul's one hundred and nine (109) month (license suspended June 2012) legal effort to regain his illegally deprived livelihood, and thus his life, property and LIBERTY, and is in effect also a petition for a writ of Habeus Corpus pursuant to 28 U.S.C. § 2241. Kaul has been wrongfully 'imprisoned' since June 2012, and the District of New Jersey, in collusion/conspiracy with The Kaul Cases Defendants is perpetuating the violation, by its continued attempts to be involved in the cases, and its continued obstruction of Kaul's efforts to become 'un-imprisoned'.**

## Reasons for Granting the Writ

A writ of prohibition will be in aid of the Court's jurisdiction and the District of New Jersey is foreclosed from exerting any jurisdiction over the case:

The Court's jurisdiction extends to protect Kaul's Constitutional rights, from an ongoing violation, and if the Court were not to preempt or cause to cease the violation, until it had furthered the irreversibility and permanency of injury, then the Court's jurisdiction over the violation, and its protection of Kaul's Constitutional rights, would be irredeemably deprived. However, if the writ is granted, the ongoing violation will cease, and the Court's jurisdiction to protect Kaul's Constitutional rights will be exercised in a timely and protective manner, consistent with Constitutional principles that empower the Court with its discretion to grant a writ.

The District of New Jersey and its judges remain in an adversarial position with Kaul, pursuant to K11-1/K11-3, and are thus constrained by the due process/impartial tribunal clauses of the Constitution from any administrative or ministerial function within any of The Kaul Cases and can make no argument to the contrary.

**Exceptional circumstances warrant the exercise of the Court's discretionary powers, and a writ of prohibition is the only remedy to prohibit the breach of natural justice, that would be caused if the case were tried in the District of New Jersey**

**From April 2, 2012 to the present, Kaul has been the subject of an “ongoing pattern of racketeering”, conducted through the executive/legislative/judicial branches of the State of New Jersey and bankruptcy/district courts within the District of New Jersey, and a “pattern” that has extended into the NYSE, the SEC and across the globe. The injuries caused and continuing to be caused to Kaul by the Defendants and the District of New Jersey, constitute “exceptional circumstances” in and of themselves, but the extreme examples lie in the fact that his requests to have investigated the crimes of The Kaul Cases Defendants have been either ignored or denied, his liberty illegally violated, and his life almost ended. Kaul has sought relief in this Court on two (2) prior occasions, and on one his plea was denied and the other was returned for correction of filing deficiencies. These facts stem from the success of Kaul's minimally invasive spine surgery practice (2002-2012), that occurred in part because in 2005, he invented a procedure that revolutionized the field of outpatient spine surgery. Since Kaul commenced litigation on February 22, 2016, he has been denied any discovery, had all of his substantive motions denied, while every substantive motion filed by the Defendants was granted. Every case,**

except K11-2, that Kaul filed in courts outside of New Jersey was transferred to the same judge in the District of New Jersey-Newark, over Kaul's strenuous objections (March 2016-Present) that he would not receive justice in New Jersey.

In K11-1 Kaul is suing the District of Newark, and in K11-3, Kaul is suing the judges within the District of New Jersey, for misconduct outside the scope of their official duties. The plausibly pled claims have not been dismissed, transferred to New Jersey nor denied by the Defendants, and have an "assumption of truth". Thus, if any of the judges or the court were involved in any aspect of any of The Kaul Cases it would constitute a willful and ongoing violation of Kaul's constitutional right to an impartial tribunal and due process, and therefore does deprive the District of New Jersey of jurisdiction. These protections are not only enshrined in the Constitution but constitute the substance of Articles 8 and 10 of the Universal Declaration of Human Rights (1948). Kaul's case is a fundamental human rights case , in which the violators include judges/politicians/law enforcement attorneys within the District of New Jersey, the very individuals that society expects, and has empowered to protect against human rights violators. Since April 2, 2012, Kaul has been subjected to tyranny, abuse of power, denial of justice, deprivation of human rights and the equivalent of a wrongful imprisonment, because he

built a successful minimally invasive spine surgery practice, that helped thousands of Americans with debilitating spinal pain.

Kaul's efforts to appeal to U.S.C.A. for the Second Circuit have been obstructed, in that his notice of appeal, received in the S.D.N.Y. on July 1, 2021 via FedEx, was not published to the docket, and any appeal of K11-9 from the District of New Jersey would be futile, and provide an inadequate remedy to the ongoing violation of Kaul's constitutional and human rights, and the illegal deprivation of critical years of his profession, now standing at almost a decade. Kaul was forty-seven (47) in 2012, and on the cusp of expanding his work globally. The Kaul Cases Defendants maliciously used the US wires and the authority of state to transmit the knowing fraud to almost every state/federal healthcare related agency in the world, including the FBI, the DEA, the National Practitioners Data Bank and every state medical board, the purpose being, as the evidence proves, to eliminate him (jailed/deported/killed) and his ability to earn a livelihood anywhere in the world.

K11-9, as one of The Kaul Cases, is of immense interest to the public and the American medical profession, because it has exposed the rampant corruption of state medical boards and other state/federal regulatory agencies by for-profit corporations, that has caused thousands of physicians to be illegally deprived of their life, liberty and property. An

element of the “HIPIC-FC” (K11-2: D.E. 65 Page 43 of 48-Appendix D) scheme is to confiscate the assets of targeted physicians (predominantly ethnic minorities/immigrants), to deprive them of their constitutional right to mount a legal defense. America incarcerates more physicians per capita than any other country in the world.

This public interest factor, pursuant to Rule 11, provides that a petition for “extraordinary” relief be granted “upon a showing that the case is of such imperative public importance as to justify deviation from normal appellate practice and to require determination in this Court.”

As plausibly pled in K11-1/K11-3, the judges and the court in the District of New Jersey have been coopted by The Kaul Cases Defendants into obstructing their prosecution by Kaul, and in the process illegally subverting the power of the United States District Court, and thus the United States, to perpetrate an “ongoing” racketeering scheme that violates Kaul’s human/constitutional rights, and continues to cause injury to his life, liberty and property.

The above facts violate Kaul’s right to natural justice, and thus the District of New Jersey and its judges are foreclosed from any adjudicatory or



ministerial involvement in any aspects of any of The Kaul Cases, including K11-9.

The facts evidence that adequate relief cannot be obtained in any other form or from any other court and that the District of New Jersey and its judges have, in collusion and conspiracy with The Kaul Cases Defendants, committed a massive 'Fraud on the Court' of the United States, an ongoing violation that only a writ of prohibition will injunct.

In 2018 Defendant Christie recommended to President Trump, that Paul Matey be appointed to the U.S.C.A. for the Third Circuit. From 2010 to 2015, Paul Matey, Esq, acted as deputy chief counsel to then Governor Christie, this being a time period in which The Kaul Cases Defendants conspired to commit, and did commit crimes against Kaul, that involved violations of RICO and Kaul's constitutional rights. Thus, any courts/judges within the U.S.C.A. for the Third Circuit are forever foreclosed from any adjudicatory or ministerial role in any aspects of any of The Kaul Cases, and the Court, therefore, is foreclosed to Kaul in the interests of natural justice. See R v Bow Street Metropolitan Stipendiary Magistrate Ex part Pinochet Ugarte (No.2) (1999). The disqualification of Lord Hoffman by the House of Lords, consequent to his directorship of Amnesty International in the case of ex-Chilean President, Augusto Pinochet. It is no coincidence that every petition Kaul has made to the U.S.C.A. for the Third Circuit, seeking to prevent a violation of his Constitutional rights, by judges within the District of New Jersey, has been denied, and as Kaul plausibly asserts in K11-2, the U.S.C.A. for the

Third Circuit, did conspire with the District of New Jersey, to manipulate the procedural posture of K1, with the intent of preventing Kaul from either prosecuting the case in the district court, or procuring appellate jurisdiction. This particular element of the grand scheme of judicial racketeering, commenced in approximately 2019, and continued until Kaul voluntarily dismissed the appeal in July 2021. The Kaul Cases Defendants, in collusion and conspiracy with judges in the District of New Jersey/U.S.C.A. for the Third Circuit, have converted the United States District Court into a “racketeering enterprise”, through which they conducted a “pattern of racketeering”, that involved the commission of hundreds of the RICO predicate acts of mail fraud/wire fraud/bribery/obstruction of justice/public corruption/judicial corruption.

## Summary of Appendices

### Appendix A – July 22, 2021: 21-CV-10326: Opposition to Defendant Boston Partners Motion to Dismiss:

The knowing/willful violation of the Sarbanes-Oxley Act by Defendants Allstate/TD/Geico (Berkshire Hathaway), has caused all The Kaul Cases Defendants, consequent to RICO, to become both civilly/criminally liable. Their only tactic, as they are now defenseless, is to attempt to transfer K11-9/K11-2 to the District of New Jersey, to the remit of one of the K11-3 Defendant judges, in order to prevent further public exposure of the SOX violation, a financial crime that is already known to the CEOs/CFOs of the S/P 500. The District of New Jersey, the U.S.C.A.-Third Circuit and their judges, have, since February 22, 2016, provided cover for a criminal scheme that commenced in 2006, and constitutes an “ongoing pattern of racketeering”, in which The Kaul Cases Defendants have converted the executive/legislative/judicial branches of the State of New Jersey, the United States District Court, the NYSE and the SEC into “racketeering enterprises”, through which they have committed thousands of the RICO predicate acts of perjury/mail fraud/wire fraud/obstruction of justice/money laundering/securities fraud/kickbacks/extortion/kidnapping/retaliation/evidence tampering/witness tampering. The conduits and cover for these crimes have been and are administrative/state/bankruptcy/federal courts within

the State of New Jersey and the Third Circuit of the United States Court of Appeals. The global integrity of the US securities market is harmed by the involvement of the District of New Jersey in any of The Kaul Cases.

Appendix B – June 9, 2021: 21-CV-13063: Complaint:

Defendant Christie was served in K11-2 on May 26, 2021 at his law office in Morristown, New Jersey. On May 27, 2021, Kaul was illegally arrested/imprisoned/maliciously prosecuted, as pled in the Complaint.

Witness to the arrest was a Dr. Evangelos Megariotis, a colleague of Kaul, with whom Kaul just happened to be on a phone call when nine (9) armed men illegally and without warrants entered his place of work. Kaul had Megariotis on speaker-phone for the duration of the events, and Megariotis did talk directly with one of the armed men. On the morning of May 28, 2021, Kaul submitted a letter into K11-2 (D.E. 18/19) that details these events and identifies Dr. Megariotis as a witness to the crime. In the afternoon of May 28, 2021, the fiancée of Dr. Megariotis was contacted via telephone by two men purporting to be DEA agents, who wanted to talk with her about Dr. Megariotis, regarding an investigation they had supposedly initiated against him. She felt threatened and intimidated, and thus did, on July 12, 2021, testify before a grand jury impaneled in the District of New Jersey. The Kaul Cases Defendants, in recognizing their immense civil/criminal liability, in part because of their violation of Sarbanes-Oxley, and Kaul's civil rights, did commit the RICO predicate act

of retaliation, in collusion/conspiracy with New Jersey based federal agencies, purposed to eliminate Dr. Megariotis as a witness, through indictment and imprisonment. In the commission of this act of retaliation and attempted witness tampering/intimidation, The Kaul Cases Defendants did convert these New Jersey based federal agencies into a “racketeering enterprise”, a principal purpose being to conceal the Defendants securities fraud crimes from the global investment market.

As part of the Defendants grand scheme of witness/evidence tampering, they did order Defendant/U.S.D.J. Wolfson, to obstruct Kaul’s prosecution of K11-9, by entering a knowingly false order of dismissal (D.E. 10-July 9, 2021). Their strategy is to delay/obstruct Kaul’s prosecution of K11-9, in the hope they can indict Dr. Megariotis, eliminate his testimony, undermine K11-9, and mitigate its threat to Defendant Murphy’s attempt to be re-elected to the Office of the New Jersey Governor, and Defendant Christie’s political career. However, the ultimate purpose of all this crime, is an attempt to conceal the securities fraud violations. The Kaul Cases Defendants may have corrupted and taken control of state/federal politicians and state/federal investigative/prosecutorial/judicial agencies and the media, but they have NO control over the global investment community, many of whom now view Defendants Allstate/TD/Geico (Berkshire Hathaway) as immense liabilities and or threats.

**Appendix C - July 6, 2021: 21-CV-10326: Letter-Kaul-SEC:**

Defendant Grewal was transferred from the Office of the NJ AG to the enforcement division of the SEC, in an attempt not only to eliminate his suability, but to have him quash any securities fraud investigations regarding the Defendants SOX violations.

**Appendix D – January 17, 2018 to May 3, 2021: Unrefuted and irrefutable evidence of judicial corruption within the District of New Jersey:**

The documentary evidence within Appendix D unequivocally establishes that the District of New Jersey is deprived of jurisdiction, because it has willfully/knowingly violated, and continues to violate Kaul’s fundamental human and constitutional right to life/liberty/property, in that it continues to obstruct Kaul’s constitutionally protected right to reclaim his life/liberty/property, after a decade of illegal deprivation. Included within Appendix D is the recitation of fact that Kaul submitted to SCOTUS on November 5, 2020, in support of his petition for a writ of mandamus to the District of New Jersey, ordering it to adjudicate Kaul’s letter (K1:D.E. 434-2 Page ID 10970) seeking permission to file twenty-two (22) motions for summary judgment. The petition, to Kaul’s knowledge, was neither docketed nor returned to Kaul, but on November 5, 2020, all claims were dismissed by Defendant/U.S.D.J. Vazquez, except that against Defendant Mitchell. The two (2) reasons for this pertain to The Kaul Cases Defendants “No Exit” scheme (K11-4: D.E. 1 Page ID 44 of 95-within

Appendix D), and the fact that the law mandated entry of summary judgment against the K1 Defendants, most of whom are Defendants in K11-2. In the petition, Kaul did raise the issue of risk to the market capitalization of Defendants Allstate/TD/Geico (Berkshire Hathaway), regarding ongoing litigation, a risk that K11-2 has caused to become actualized, in that it exposes the Defendants securities fraud. Had the November 5, 2020 petition been granted, and K1 brought to settlement, the Defendants would likely not now be subject to serious criminal/civil liability, from amongst others, their shareholders.

## Conclusion

For the above stated reasons, and because one of the judges is under judicial investigation pursuant to a complaint filed by Kaul, he does respectfully move this Court to issue a writ of prohibition to all judges in the District of New Jersey, prohibiting them from having any adjudicatory or ministerial involvement in any aspect of any of The Kaul Cases.

Kaul respectfully requests that this Court refer The Kaul Cases Defendants to American prosecutorial authorities, for having violated the Sarbanes-Oxley Act. Kaul will be referring the matter to the US Attorney for the Southern District of New York.

I, Richard Arjun Kaul, MD, the Petitioner, do hereby certify that the above statements are true and accurate to the best of my knowledge, and that if it is proved that I willfully and knowingly misrepresented the facts, then I will be subject to punishment.

Dated: July 25, 2021

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RICHARD ARJUN KAUL, MD



opinion/order was entered based entirely on Kaul's purported claim insufficiency, with no reference to the Defendants preclusion defenses.

**K2:** On September 6, 2019, the Defendants submitted a letter-brief (K2-D.E. 91 Page ID 1567 to 1574) that sought to "foreclose" Kaul from prosecuting any of his claims, based on preclusion defenses. Kaul submitted opposition on October 1, 2019 (K2-D.E. 93 Page ID 1577 to 1595) (Exhibit 12). The Defendants motion was not granted.

**K5:** The Defendants, in seeking to have the case dismissed and or transferred to the District of New Jersey, as they are here, did not submit any preclusion defenses (K5-D.E. 82 Page 2 of 28). The Court did not raise the preclusion issue.

**K11-1/K11-3:** The Defendants in not submitting motions to dismiss/transfer, have submitted no preclusion defenses.

**Table of Evidence/Injuries:**

	April 2, 2012 to March 23, 2013 (Filed Kaul v Heary)	2013-2021
<b>Injuries to Kaul/his malpractice carriers</b>		
Loss of Bernardsville residence (home of Kaul's children)		May 2016
Loss of Manhattan residence	April 2013	
Loss of NJSR Surgical Center		July 2014
Loss of license for NJSR II Surgical Center		December 2014
Loss of past/future medical career (1983-2054)		
Loss of reputation	April 2, 2012	
Suspension of medical license	April 2, 2012	
Revocation of medical license		March 24, 2014
Defrauding Kaul of \$45 million AR owed by insurance carriers		Perpetrated in bankruptcy court (July 21, 2014 to July 31, 2020) by Defendant Stolz/Allstate/Geico (K4)
Loss of CDS prescribing license	May 2012	
Loss of DEA prescribing license		2015
Denial of application for re-instatement of NJ license		May 2014
Denial of first application for PA license		July 25, 2018

Arrest + imprisonment for unpaid child support		September 21, 2016
NJ State indictment for alleged unpaid state taxes		May 2016
Denial of banking services + reporting to www.checksystems.com	September 2013	
Exclusion from Federal Health Care Programs		January 2016
Chapter 11 bankruptcy of Kaul's corporations		June 17, 2013 to July 21, 2014
Chapter 7 bankruptcy of Kaul's corporations		July 21, 2014 to July 31, 2020
Reporting of suspension to National Practitioners	April 10, 2012	
Reporting of revocation to National Practitioner Data Bank	February 12, 2014	
Suspension of NJ driving license		March 2015
Revocation of NJ driving license		March 2018
Loss of car		November 2015
Allstate v Kaul:UNN-L-322-15		January 29, 2015
Allstate v Casatelli/Kaul:UNN-L-3322-15	May 2012	
Sica v Kaul:UNN-L-7421-12	October 5, 2012	
Park v Kaul:BER-L-7116-14		July 21, 2014
Santos v Kaul:BER-L-3322-15		September 24, 2015
McLean v Kaul:ESX-L-802-14		2014
Economou v Kaul:BER-L-8607-13	June 2013	
Kaul v Kaul:FM-18-254-06		2014
Pinto v Kaul:ESX-L-8409-12	November 2012	
Ernst v Kaul:OCN-L-2256-12	August 2012	
Terry v Kaul:ESX-L3614-12	May 2012	
Zetterberg v Kaul:ESX-L-5451-12	July 23, 2012	
<b>JUDGMENTS AGAINST KAUL/MEDICAL MALPRACTICE CARRIERS</b>		AT LEAST \$9,555,000
Reporting of suspension + revocation to Medicaid Fraud Division		August 1, 2014
Criminal investigation by NJ FBI/NJ AG to file indictment for alleged healthcare fraud	Commenced in approximately June 2013	Concluded in approximately May 2016. K1 filed on 2/22/2016.
Wrongful arrest/false imprisonment/malicious prosecution ordered by K11-9 Defendants		May 27, 2021
Credit rating	April 2, 2012-750	300-350
Poverty		Commenced July 21, 2014

Homelessness		Commenced May 31, 2013
No income		Commenced July 21, 2014
No health insurance		Commenced June 17, 2013
Unemployed		Commenced July 21, 2014
Foreclosed from practicing medicine	April 2, 2012	
Defamatory online articles	Commenced April 2, 2012	Ongoing
Deprived of constitutional/human rights by administrative/state/bankruptcy/federal judges within the geographic boundaries of New Jersey	Commenced February 2, 2010	Ongoing
<b>INJURIES TO KAUL'S CHILDREN</b>		
Deprived of time with Kaul	Commenced April 2, 2012	Ongoing
Maliciously subjected to trauma associated with threatening/abusive legal service	Commenced June 2012	Concluded after eviction from childhood home (May 2016).
Maliciously subjected to trauma associated with slanderous press coverage	Commenced April 2, 2012	Ongoing
Forced to change school	August 2012	
Evicted from childhood home		May 2016
Maliciously subjected to trauma associated with two home invasions	2010/2013	
Deprived of financial child support		Commenced July 21, 2014 and ongoing.
<b>Evidence</b>		
'The Zerbini Certification': D.E. 4 Page 220 of 230		August 21, 2017
'The Sabo Certification': D.E. 4-1 Page 14 of 254		August 10, 2017
'The Solomon Critique': K1-D.E. 225 Page ID 4940		January 17, 2018
'The Solomon Critique 2': K1-D.E. 299 Page ID 7202		February 11, 2019
'The Calabrese Certification': D.E. 4-1 Page 11 of 254		February 5, 2018
'The Przybylski Disciplinary Notice': K1-D.E. 299-22 Page ID 7504		May 21, 2018
'The Feldman Certification': K2-D.E. 53		September 27, 2018
'Stolen by Stolz': K4-D.E. 1		September 20, 2018

Denial of licensure from 32 state medical boards		September 22, 2020.
<b>PHYSICAL INJURIES</b>		<ul style="list-style-type: none"> <li>-Malignant Hypertension (240/130)-5 hospitalizations.</li> <li>-Renal colic attacks-4 episodes/hospitalizations.</li> <li>-Two grand mal seizures/complex tongue laceration/surgical repair (July 31, 2015)/hospitalized.</li> <li>-Diabetes (May 2, 2019)/hospitalized.</li> <li>-Violent fall/neck injury (May 27, 2021)/hospitalized.</li> </ul>

The Defendants argument (Page 23 to 33 of 51) is without foundation in the law, as detailed in Exhibit --, and in the law of K1/K2/K5, in which none of the dispositive orders/opinions incorporated the Defendants preclusion defenses. Central to a preclusion analysis is the emergence of “new” evidence and injuries, that were either not previously in existence or not in the possession of the plaintiff. The Defendants separate comparisons of Kaul v Heary with K11-2 and K1 with K11-2 fail to withstand a deductive analysis of their argument, the argument being that K11-2 is purportedly identical to Kaul v Heary, and that because Kaul v Heary was dismissed, therefore K11-2 should be dismissed. No court found that Kaul v Heary was identical to K1, and K11-2 contains evidence/injuries not in existence/available in K1, and therefore K11-2 is not identical to either K1 or Kaul v Heary, and thus the Defendants preclusion defenses are precluded. A proper analysis would have been based on the evidence/injuries, but instead is a cursory and superficial comparison of claim construction, not foundation. However, even if the evidence/injuries were identical, which they are not, the claims in Kaul v Heary and K1 were not litigated on the merits, but more importantly, the massive fraud committed against Kaul in administrative/state/bankruptcy/federal courts (2012-2021) within the geographic boundaries of the State of New Jersey render null/void the Defendants preclusion defenses:

FILED  
IN CLERKS OFFICE

2021 JUL 22 PM 2:40

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF MASSACHUSETTS**

U.S. DISTRICT COURT  
DISTRICT OF MASS.

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RICHARD ARJUN KAUL, MD

Plaintiff,

v.

CIVIL CASE NO.: 21-CV-10326-ADB

BOSTON PARTNERS, ET AL

**OPPOSITION TO DEFENDANT BOSTON  
PARTNERS MOTION TO DISMISS**

Defendants

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Dated: July 21, 2021



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RICHARD ARJUN KAUL, MD

**Authorities**

Sarbanes-Oxley Act – Page 4

Tellabs, Inc v Makor Issues and Rights (No. 06-484) 437 F. 3d 588 – Page 6

## Argument

### KAUL'S RICO/FRAUD CLAIM SATISFIES THE HEIGHTENED PLEADING STANDARD PURSUANT TO RULE 9 AND TWOMBLY/IQBAL

The Defendant argues that Kaul's RICO claim states nothing more than Defendant Boston Partners is a shareholder in Defendant Allstate, and that because this allegation fails to meet the pleading standard set forth in Rule 8(a)(2), that therefore the claim should be dismissed. Kaul refers the Court to D.E. 1. Page 65 Of 286. The premise, the proposition and conclusion of this argument are false. Claims of mail/wire fraud require a heightened pleading of plausible fact, pursuant to Twombly/Iqbal and Rule 9 of the FRCP, and the commercial relationship between Defendants Boston Partners/Allstate is, contrary to their assertion, indeed one in which Boston Partners holds shares in Defendant Allstate. In fact, on Page 5 of 6, it admits it is a shareholder by stating: **"Plaintiff sent a letter to the CEO of Boston Partners in November 2018 to notify the company of Allstate's alleged failure to disclose ... Boston Partners sold the majority of its shares, and the prices of the stock dropped subsequent to the sale."** (D.E. Page 5 of 6). This point, however, is irrelevant in the context of the association-in-fact enterprise formed by Defendants Allstate/Boston Partners/State Street Capital, which Kaul has plausibly pled was used by the Defendants to perpetrate schemes of RICO predicate acts (mail fraud/wire fraud/judicial corruption/public corruption/bribery/kickbacks) through a **"pattern of racketeering"** purposed to increase corporate profit through the exploitation of Kaul's medical expertise, and at the expense of Kaul's life, liberty and property.

### THE DEFENDANT'S KNOWING/WILLFULL AND ONGOING VIOLATION OF THE SARBANES-OXLEY ACT, DEPRIVES IT OF ANY DEFENSE, INCLUDING THAT OF THE CORPORATE VEIL.

The thrust of Defendant Boston Partners defense is twofold, in that **(i)** there exists no legal basis on which to hold them liable for the crimes of Defendant Allstate, implying that they had no knowledge of the crimes; **(ii)** that even if they did know about the crimes, Kaul's RICO/Tort claims are either not sufficiently simple or do not comport with Rule 8, and therefore they cannot be held liable.

Both of these prongs are false. The Defendant admits that it withdrew its position in Defendant Allstate, upon receipt of legal notice from Kaul in November 2018, of Defendant Allstate's crimes, that included a violation of the Sarbanes-Oxley Act (D.E. 1 Page 5 of 6). Defendant Boston Partners failed to report the violation to the SEC or the market and has continued to issue knowingly false filings, in regard not just to Defendant Allstate, but as to Defendants TD/Geico (Berkshire Hathaway), in which it also holds substantial shares. Kaul's claims and the Defendants admission establish a mens rea and direct liability, but even absent these facts, the Defendant would be vicariously liable pursuant to RICO. The second prong, which pertains to claim sufficiency, length and relative complexity, is false. This is evident from both the Complaint, and the fact that many other Defendants sufficiently understood the claims to file multiple substantive defenses (res judicata/eleventh amendment/personal jurisdiction), with no reference to claim architecture. However, even if this prong were true, which it is not, the purported deficiency is not in any way fatal to the claim, as it would be cured with amendment. The Defendant has not exercised its right to deny the claims, but in not doing so, has admitted the existence of further probative fact, that Kaul asserts is relevant to a fraud-based piercing of the corporate veil. Kaul would, if so required, submit an amended claim.

Woven into the Defendant's defense is the sub-argument that because Kaul supposedly articulated no nexus between the reduction in share price and his claim regarding the Defendants knowing participation in the crimes of Defendant Allstate, that the Defendant, therefore, cannot be held liable for Defendant Allstate's crimes. This is false, but even if it were not false, it would have no bearing on Kaul's plausibly pled RICO/Tort claims against the Defendant. However, in the Complaint, Kaul, having identified the reduction in share value after receipt of the November 22, 2018 notice, then states: **"Subsequent to receipt of the letter the Defendants did use the US mail and wires in furtherance of their conspiracy to perpetuate their "pattern of racketeering" (D.E. 1 Page 67 of 286) ... Subsequent to the November 22, 2019[sic-8] letter, the Defendants conspired to conceal the information from the market, which caused an illegal rise in share price. In the first quarter of 2020, Defendant Boston Partners divested a majority of its holdings in Defendant Allstate. The share price of Allstate dropped to approximately \$75. On August 18, 2020, Kaul sent a second letter to Donovan and**



**Hooley ... In late 2020, Defendant Allstate, through a series of buy-backs and other modes of market manipulation, caused an illegal rise in share price to approximately \$102.”** (D.E. 1 Page 67 of 286). Defendants Allstate/Boston Partners/State Street Capital crimes, as evident from the facts in Kaul’s Complaint, involved a conversion of the NYSE into a **“racketeering enterprise”**, that commenced in approximately 2010 and was purposed to eliminate Kaul. The Defendants failed to calculate that Kaul would commence litigation on February 22, 2016 (K1-Kaul v Christie:16-CV-02364) and would ascertain in 2018 that Defendants Allstate/TD/Geico had violated the Sarbanes-Oxley Act, and then in 2020, that Defendants Boston Partner/State Street Capital had violated the Sarbanes-Oxley Act. The Defendants, in realizing that Kaul had exposed their crimes (racketeering/mail fraud/wire fraud/financial fraud) from bribing Defendant Christie to violating Sarbanes-Oxley, did sell their shares in Defendant Allstate/TD/Geico, did continue to fail to report the liabilities to the market and did conspire with Defendant Allstate to engage in market manipulation to cause an illegal rise, in 2020, in Defendant Allstate’s share price. In the commission of these crimes, the Defendants, as Kaul has pled, did convert both the NYSE and the legislative/executive/judicial branches of the State of New Jersey into **“racketeering enterprises”** through which they committed thousands of RICO predicate acts, all purposed to increase share price. The crimes of **The Kaul Cases** Defendants have caused a massive injury to the integrity of the United States securities market and the Defendants continue to cause that injury by continuing to fail to report the liabilities of **The Kaul Cases**. An **“ongoing pattern of racketeering”** the cumulative consequences of which are, as the Defendant states: **“ ... virtually unprecedented ...”** (D.E. 39 Page 5 of 6).

**Sarbanes-Oxley deprives the Defendants of a “Corporate Veil” defense**

The November 22, 2018 (D.E. 4-1 Page 18 of 254) and August 18, 2020 (**Exhibit 1**) letters provided the Defendant knowledge of knowingly fraudulent SEC submissions (10K + 13K) made by Defendants Allstate/TD/Geico. The Defendant sold its shares but did not report the SOX sections 306/906 violations to the SEC or the US Attorney and did not disclose this liability in its own quarterly/annual filings, nor its tax returns. These omissions constitute evidence of a fraudulent state-of-mind, and as held by SCOTUS in **Tellabs, Inc v Makor Issues and Rights (No.**

06-484) 437 F. 3d 588 exceed the ‘strong’ inference of scienter that a court considers in its analysis of a defendant’s right, or lack thereof, to raise a “**corporate veil**” defense. Kaul plausibly pleads the Defendants participation in Defendants Allstate/TD/Geico’s RICO scheme (2010 onwards), a fact not refuted by the Defendant, and which in conjunction with Defendant’s aforementioned failure to report, infers that Defendants selling of shares was the product of an “**ongoing**” conspiracy with Defendant Allstate (insider trading), conducted in the belief that Kaul would never subject them to litigation, and purposed to distract regulators/market from its SOX violations, and those of Defendants Allstate/TD/Geico (Berkshire Hathaway). The Defendant calculated, albeit incorrectly, that the risk of not reporting the SOX violation was outweighed by the risk of share devaluation and civil/criminal penalties consequent to reporting the violation. These cumulative facts deprive the Defendant of a “**corporate veil**” defense. The crime of one, becomes the crime of all, as codified within the vicarious liability/aiding and abetting doctrine within RICO.

The Defendant’s claim that Kaul’s allegation of concealment lacks specificity is false, as SCOTUS held in Tellabs, that when determining the existence of a strong inference of scienter, courts must consider the complaint in its entirety, as well as documents incorporated into the complaint by reference (2018/2020 letters to top ten corporate shareholders Defendants Allstate/TD/Geico). This body of evidence exceeds the pleading standard, and the Defendant has provided no plausible explanation as to its failure to report. Kaul’s fraud allegations are accepted as true, the inference of scienter is cogent/compelling, and the Defendant has submitted no other explanation.

Birbara v Locke, 99 F.3d 1233, 1239 (1<sup>st</sup> Cir. 1996):

Proposition: That the corporate veil cannot be pierced, when an innocent investor has neither participated in, nor has knowledge of the wrongdoing of the corporation in which it invests.

Kaul Facts: The Defendant both participated in the crimes committed against Kaul (bribery of Defendant Christie re: quid pro quo revocation) and there exists evidence (unrefuted 2018/2020 letters) that despite the Defendant being made aware of the crimes, it did not report the offenses to regulators/market, the inference being that it had conspired with Defendants Allstate/TD/Geico in the commission of the crimes. The claims in the instant matter

are based on criminal misconduct. Case Facts: A contractual dispute, in which the parent corporation/officers neither participated in, nor had knowledge of its subsidiary's contractual violations. The case involved no allegations of use of the US mail/wires to perpetrate a knowing fraud. The case contains no allegations of criminal misconduct. Holding/Conclusion: **"Courts are more willing to disregard the corporate veil in tort than in contract cases"** at 1238. Fraud excepts the corporate veil, in that **"when there is active and direct participation by the representatives of one corporation, apparently exercising some form of pervasive control, in the activities of another and there is some fraudulent or injurious consequence of the intercorporate relationship ..."** at 1238. See Complaint: **"Defendants Allstate/Boston Partners/State Street Corporation in forming an Association-In-Fact Enterprise ("ABS Enterprise"), with the intent and purpose of conducting a "pattern of racketeering" to advance a knowingly illegal scheme of grand corruption, through the commission of the predicate acts mail fraud/wire fraud/judicial corruption/public corruption/bribery/kickbacks, purposed for executive/corporate profit, did intentionally cause an immense injury to Kaul."** The Court, in reaching its conclusion, specifically referenced **"financial misconduct"** as a condition that, if it existed, would have caused a stripping of the corporate veil. The corporate defendants (public/private) in the instant matter continue to remain in violation of SOX, in that they continue to fail to report their liability to the market/investors. This case undermines the Defendant's argument.

## **Conclusion**

The arguments of Defendant, Boston Partners, Inc. have failed to establish a corporate veil defense, because Kaul has plausibly pled, and there exists evidence, of its knowing/willful participation in an illegal “**racketeering**” scheme that commenced in approximately 2009/2010, is ongoing and has been conducted through the executive/legislative/judicial branches of the State of New Jersey, the New York Stock Exchange and most recently the SEC. Its ongoing commission of fraud, amongst other things, precludes its defenses, and thus its motion should be denied.

**Certification**

I, Richard Arjun Kaul, the Propria Persona Plaintiff, do hereby certify that the within pled facts are true and accurate to the best of my knowledge, and that if its proved that I knowingly and willfully misrepresented the facts, then I will be subject to punishment.

Dated: July 21, 2021

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RICHARD ARJUN KAUL, MD

# Appendix B

RICHARD ARJUN KAUL, MD  
440c SOMERSET DRIVE  
PEARL RIVER, NY 10965  
862 881 9703  
drrichardkaul@gmail.com

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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RICHARD ARJUN KAUL, MD

Plaintiff

v

Civil Case No.:

PHILIP MURPHY, CHRISTOPHER J. CHRISTIE,  
GURBIR GREWAL, ROBERT MCGUIRE,  
DOREEN ANNETTE HAFNER

**CIVIL RIGHTS COMPLAINT**

Defendants

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I, Richard Arjun Kaul, the Propria Persona Plaintiff, of full age, do hereby submit this Complaint/Exhibits in support of my application for the within stated relief.

Dated: June 9, 2021

  
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RICHARD ARJUN KAUL, MD

## The Kaul Cases

- K1 – Kaul v Christie: 16-CV-02364
- K2 – Kaul v Christie: 18-CV-08086
- K3 – Kaul v Schumer: 19-CV-13477
- K4 – Kaul v Stolz: 18-CV-01489
- K5 – Kaul v Federation: 19-CV-3050
- K6 – Kaul v Kaufman: State Criminal Indictment
- K7 – Kaul v Federation: 20-CV-01612
- K8 – Plaintiffs v Kaul (All criminal/civil cases filed against Kaul from 1999 to 2015 in the UK/US)
- K9 – Stolz v Kaul: 20-AA-01011
- K10 – Kaul v Plaintiffs (All cases filed by Kaul to reverse judgments/verdicts entered from 1999 to 2015 in the UK/US)
- K11-1 – Kaul v Federation: 21-CV-00057
- K11-2 – Kaul v Boston Partners: 21-CV-10326
- K11-3 – Kaul v Allstate: 21-CV-00736
- K11-4 – Kaul v Murphy: 21-CV-09788
- K11-5 – Kaul v State of New Jersey: Docket Number Pending (Indian High Court)
- K11-6 – Kaul v Moore: Docket Number Pending (New York Supreme Court)
- K11-9 – Kaul v Murphy: Docket Number Pending (U.S.D.C. – S.D.N.Y.)
- P1 – Kaul/Patel v Crist/State of New Jersey: 19-CV-08946
- P2 – Kaul/Patel v Crist/Allstate: 19-CV-09232



## **Parties**

### **PLAINTIFF:**

Richard Arjun Kaul, MD:  
440c Somerset Drive, Pearl River, NY 10965

[www.drrichardkaul.com](http://www.drrichardkaul.com)

Minimally invasive spine surgery pioneer, who in 2005, invented and performed the first ever outpatient minimally invasive spinal fusion, a procedure that revolutionized the field of spine surgery.

[https://www.youtube.com/watch?v=q\\_HBzqfggrg&t=338s](https://www.youtube.com/watch?v=q_HBzqfggrg&t=338s)

<https://www.youtube.com/watch?v=JX4bnRPPucl&t=26s>

<https://www.youtube.com/watch?v=oxaV5lJuZ7c>

<https://www.youtube.com/watch?v=85VlU2HREdc&t=718s>

<https://www.youtube.com/watch?v=5OR5N9bJMAg&t=1s>

<https://www.youtube.com/watch?v=guwx5kuBiEg&t=6s>

### **DEFENDANTS:**

Philip Murphy: Current Governor of the State of New Jersey  
45 Blossom Cove Road  
Red Bank, NJ 07701

Christopher J. Christie: Ex-governor of the State of New Jersey  
47 Corey Lane  
Mendham, NJ 07945

Gurbir Grewal: NJ AG  
25 Market Street  
Trenton, NJ 08611

Robert McGuire: NJ DAG  
25 Market Street

Trenton, NJ 08611

Doreen Annette Hafner: NJ DAG  
49 Seminole Drive  
Ringwood, NJ 07456

## Preliminary Statement

1. The facts of this case prove The Kaul Cases.
2. Kaul was illegally arrested and imprisoned on May 27, 2021, in a scheme engineered and orchestrated by the Defendants, purposed to obstruct justice, violate the authority of the United States District Court and obstruct Kaul's prosecution of The Kaul Cases.
3. This case seeks compensatory and injunctive relief against the Defendants in both their official and personal capacities for having willfully, knowingly and with malice aforethought violated the fundamental civil rights of Plaintiff, Richard Arjun Kaul ("Kaul"), a violation that caused Kaul to sustain a violent life-threatening fall and injury to his neck.
4. The Defendants recognize both the unlawfulness of their scheme, and that their criminal scheme was conducted in their personal capacities, for which they know they have no immunity. The Defendants are extremely fearful of the civil/criminal consequences of their crimes, as exposed and detailed in The Kaul Cases, and did thus act lawlessly, in an attempt to harass/intimidate/incarcerate Kaul, in order to try and stop him from prosecuting The Kaul Cases.
5. This case provides further highly incriminating evidence of The Kaul Cases claims, and substantiates, to a criminal standard, all elements of all claims, including conspiracy/fraud/mail fraud/wire fraud/obstruction of justice/deprivation of right under color of law/violation of Kaul's constitutional and civil rights. This case evidences the Defendants increasingly desperate escalation of illegality, all purposed to attempt to provide cover for the massive criminal enterprise they commenced conducting in 2006 in administrative/state/bankruptcy/federal courts within the geographic boundaries of the State of New Jersey and the federal court in the District of Columbia.

## Chronology of Culpability

6. From February 22, 2016 to the present Kaul filed The Kaul Cases. In this period every motion filed by Kaul for discovery or judgment has been denied or ignored, and every legal right under federal law and the constitution has been violated. Kaul has been obstructed from exercising his rights under the federal rules of civil procedure. This grand scheme of obstruction has been orchestrated and perpetrated by the Defendants and certain judges within the United States District Court at the district and appellate levels. Kaul has no evidence, at this time, of any involvement of judges on the Supreme Court of the United States.
  
7. On May 27, 2021, Kaul's fundamental human rights were violated, and he was falsely arrested, imprisoned and became subject to an event that could have paralyzed or killed him. Certain judges within the United States District Court and the Defendants are directly responsible for this event and the illegal arrest/imprisonment. At the core of this culpability is corruption by The Kaul Cases Defendants of state/federal judges/politicians, a corruption that commenced in 2006 and is ongoing in 2021, with near lethal consequences. The Defendants converted both certain courts of the United States District/Bankruptcy Courts (U.S.D.C.-District of New Jersey + U.S.D.C.-District Northern Georgia + U.S.D.C. – S.D.N.Y. + U.S.D.C. – District of Connecticut + U.S.D.C. – District of Northern Texas + U.S.D.C. – District of Northern Illinois + U.S.B.C. – District of New Jersey) and the legislative/executive/judicial branches of the State of New Jersey into “**racketeering enterprises**”, through which they conducted their “**pattern of racketeering**”, the purpose of which was to provide ‘cover’ for their previous crimes of perjury/fraud/bribery/obstruction of justice/mail fraud/wire fraud/public corruption/kickbacks/conspiracy. Certain judges in these courts aided/abetted the Defendants “**pattern of racketeering**”, but had they not participated in the scheme, and instead adhered to the law and not violated Kaul's rights, then The Kaul Cases would either have been fully litigated or close to claim resolution. On May 27, 2021, the

willfully negligent and malicious actions of these judges and the Defendants placed Kaul in a lethal position and caused a massive violation of his basic human rights.

8. The record in The Kaul Cases contains a vast amount of evidence of the culpability of certain judges and the Defendants. Submitted with K11-9 is some of this evidence:
9. March 29, 2016: K1 – Letter from Kaul to U.S.D.J. Richard Sullivan (Exhibit 1):  
“I believe that for the above reasons the matter should remain in the Southern District of New York, and I firmly believe that if the court transfers the matter to the District of New Jersey I will be prejudiced ... However, if the matter is transferred to the District of New Jersey I believe for the reasons stated above, that the New Jersey defendants, particularly Christie, will have an unfair advantage. Because of the unique circumstances and facts surrounding this case, that involve a politician/lawyer defendant with connections to all parts ... he will use his influence to pervert the course of justice ... the evidence of his official misconduct over the last four years supports my grave concerns about the impartial justice my matter would receive in New Jersey ...”
10. July 14, 2016: K1 – Interlocutory Appeal to U.S.C.A. for the Second Circuit (Exhibit 2):  
“The District of New Jersey will be strained to deliver impartial justice because of the Politico-legal nexus between its judiciary and the defendant-appellees.”
11. September 8, 2016: K1 – Letter from Kaul to Defendant/U.S.M.J. Mannion (Exhibit 3):  
“I am of the opinion that the issue of venue, in this matter, is critical. I would, therefore, like to know when the next case management conference will occur, and whether the motion to retransfer the matter to the S.D.N.Y. will be considered.”
12. October 6, 2016: K1 – Letter from Kaul to Defendant/U.S.M.J. Mannion (Exhibit 4):  
“I write this letter to bring to the court’s attention a number of state-orchestrated acts that I believe have been instigated in retaliation for the above matter ... I therefore

**request permission to file a temporary restraining order and preliminary injunction, that bars the defendant state from pursuing any further legal action against my property or person ...”**

13. April 15, 2018: K1 – Letter from Kaul to U.S.D.J. McMahon (Exhibit 5):

**“I write this letter to request that the Court reconsider the TRANSFER ORDER (D.E. 3) issued on April 11, 2018, as there is no evidence in the Order that any consideration was given to my argument that I have not, and will not, receive substantial justice in New Jersey.”**

14. February 20, 2019: K1 – Letter from Kaul to U.S.D.J. Brown (Exhibit 6):

**“I write this letter to bring to the Court’s attention an issue that I believe constitutes an act of retaliation by an agency (Department of Health) of Defendant State of New Jersey, in response to the above lawsuits ... Defendant Allstate’s policy of racial discrimination against Indian healthcare providers ... three state ‘inspectors’ were sent as part of a retaliatory scheme designed to harass, intimidate and cause me [Patel] further reputational and potential economic harm.”**

15. February 25, 2019: K1 – Letter from Kaul/Patel to NJ state employee, Crescenza/Kafarski/Koehler/Marra/Prostusada (Exhibit 7):

**“During the above references discussions, it was agreed that the purpose of the ‘unannounced visits’ was to attempt to harass + intimidate + dissuade Plaintiff Patel from prosecuting the above cases. You were instructed to find or fabricate a basis on which to close his facility, the true purpose of which, however, was nothing more than retaliation, and an effort to deny Plaintiff Patel his right to due process in the United States District Court, for the Northern District of Georgia.”**

**16. March 4, 2019: P1 – Letter from Kaul/Patel to U.S.D.J. Brown (Exhibit 8):**

**“Similarly, in this vein of disrespect for Georgian corporations, and what now appears to be a disdain for a federal court located in Georgia, Defendant Allstate wants the case moved back to New Jersey. The reason for this has been plausibly pled in our prior submission, and it pertains to Defendant Allstate's twenty-two (22) year-long campaign of judicial bribery in the State of New Jersey, that has unfortunately involved both state and local federal judges.”**

**"The corruption in administrative + state +federal courts in New Jersey is profound and rampant, and the interests of justice would be dealt a great disservice of [sic] this case is transferred to the [sic] any federal court within the boundaries of Defendant State of New Jersey, particularly in light of the fact that the State of New Jersey is a defendant."**

**17. March 12, 2019: P1 – Letter from Kaul/Patel to U.S.D.J. Brown (Exhibit 9):**

**“We write this letter to bring to the Court’s attention the fact that the lawyers for defendant Richard Crist, have lied to the Court ... This is just another reason, as to why, in the interests of justice and equity, venue is proper in the United States District Court for the Northern District of Georgia.”**

**18. March 25, 2019: P1 – Order of U.S.D.J. Brown (Exhibit 10):**

**“Plaintiffs also assert that “[t]he corruption in ... federal courts in New Jersey is profound and rampant, and the interests of justice would be dealt a great disservice of [sic] this case is transferred to the [sic] any federal court within the boundaries of Defendant State of New Jersey.”**

**“The Court finds that venue is ... proper in the District of New Jersey, and the interest of justice support a transfer.”**

**19. June 6, 2019: P2 – Certification from Patel to U.S.D.J. Defendant/U.S.D.J. Vazquez**

**(Exhibit 11):**

**“At a point in time Pringle + Hickey + Hunczak commenced drafting the opinions of Dr. Gross, and ordered him to sign the documents, under threat of termination. These individuals falsified the reports to ensure the patients were denied care, the purpose of which was to increase the corporation’s profits.”**

**20. July 19, 2020: K1 – Email Kaul to McGuire/Counsel for all The Kaul Cases Defendants**

**(Exhibit 12):**

Defendant Christie admissions of fact:

**“In a period from 2006 to 2019 I [defendants] admit that I engaged in a repeated pattern of corruption of administrative, state and federal courts within the geographic boundaries of New Jersey, the purpose of which was to deprive Plaintiff Kaul of any access to justice, strip him of his medical license, his property, his reputation, his material assets, deprive him of banking services and have him jailed, deported and or die”**

**“I [defendants] willfully and knowingly violated the law, when I engaged in a pattern of racketeering with other defendants, in which I abused the authority of state agencies and power by committing and or facilitating bribery, fraud, kickbacks, extortion, perjury, evidential falsification and witness tampering.”**

**“After the revocation of Kaul's license on March 12, 2014, I participated with other defendants in hundreds of emails, telephone and in-person communications in which we predicted and celebrated the imminent descent of Kaul and his family into poverty.”**



**21. August 26, 2020: K1 – Letter from Defendant/NJ-DAG McGuire to Defendant/U.S.D.J. Vazquez (Exhibit 13):**

**“ ... our client is reserving the right to request that this Court issue a future order that prevents a recurrence actions like yesterday’s and provides appropriate consequences for Dr. Kaul’s willful decision to bypass service on counsel of record, and to intrude on my client’s party, which can be viewed as having been done for purposes of potential intimidation.**

Defendant McGuire, unable to secure an order from Defendant Vazquez and unable to legally stop the prosecution of **The Kaul Cases** Defendants by Kaul, was forced into using illegal tactics, that included lying to Callahan, that Kaul had threatened Defendant Christie. Defendant McGuire’s lie, other than causing Kaul to be subjected to an illegal arrest/imprisonment, did subject Kaul to a potentially lethal situation and did cause the State of New Jersey/actors to become liable to Kaul. Additionally, although there were nine (9) armed police officers against one unarmed man, Kaul, the situation became rapidly hostile and placed these officers unnecessarily in harms way. Crimes were committed by Defendants McGuire/Christie against Kaul, the State of New Jersey and the United States.

**22. August 29, 2020: K1 – Letter from Kaul to Defendant/U.S.D.J. Vazquez (Exhibit 14):**

**“The Defendants have committed many very serious crimes, that have caused many very serious injuries ...”**

**23. September 5, 2020: The Kaul Cases – Defendant Sweeney Admissions of Fact (Exhibit 15):**

**“I acknowledge that during these discussions I informed Governor Murphy that he should order the NJBME NOT to reinstate your license, as if he did, Allstate/Geico had threatened to expose the fact that I, along with many other state politicians/governors had engaged in a decades long scheme of public corruption/tax evasion.”**

24. November 9, 2020: K1 – Certification of Dina M. Kaul (Exhibit 16):

**“On multiple occasions the individual screamed at me, while my children stood behind me in a state of utter panic. On a number of occasions my son asked me if I and or the Plaintiff, their father, were going to jail.”**

**“From April 2012 to mid 2016, just after the Plaintiff filed a RICO claim against the Defendants, armed Sheriffs officers frequently appeared at my home to serve legal papers for the Plaintiff. This occurred on a monthly basis.**

**“A family member of mine involved in the New Jersey healthcare sector, an individual with direct knowledge of the Defendants’ crimes, has confirmed to me the truthfulness of the Plaintiff’s claims.”**

25. April 14, 2021: K11-4 – Email-Kaul-Defendant McGuire (Exhibit 17):

**“I am now informing you, explicitly and unambiguously, and for a third me, that you are to send any materials to me, and that I will relay them to the clients for whom my office has agreed to provide representation. No "delay" can result from that, because service through me will be considered service on them, by their express acknowledgement, so any potentially applicable deadlines that run from service are unaffected. If you choose to communicate with them directly again, despite what is now a third express warning not to do so, it cannot reasonably be viewed as anything other than an attempt to harass them, and courts will be informed of this, including the court in New Jersey, where I represent these clients.”**

Defendant McGuire’s motion to Defendant Vazquez to enter an order that gave the Defendants the right to NOT respond to any of Kaul’s claims, was denied on May 19, 2021. The Kaul Cases Defendants, left with no legal options/defenses, thus resorted to

illegal methods and had Kaul illegally arrested/imprisoned on May 27, 2021, during which he sustained a fall that has caused an injury to his neck.

26. April 27, 2021: K11-4 – Email-Kaul-Defendant McGuire (Exhibit 18):

**“As for your frivolous threat to file an ethics complaint, I categorically deny your allegation. First, I am not involved personally in efforts to obtain outside counsel. Second, other persons within the Attorney General’s office are responsible for potential retention of outside counsel and did undertake efforts to procure outside counsel in the event that the Connecticut case went forward, which has proved unnecessary in light of the court’s transfer of the matter. The disclosure of any further details regarding any potential retention could infringe on the attorney-client privilege and is not required.”**

On May 31, 2021, Kaul filed an ethics complaint against Defendant McGuire. Had the judge in CT NOT transferred the case and allowed Kaul to prosecute the matter, it is likely the events of May 27, 2021 would not have occurred.

27. May 19, 2021: K11-4 – Order of Defendant/U.S.D.J. Vazquez (Exhibit 19):

**“Presently before the Court is the State of New Jersey’s Office of the Attorney General’s motion seeking entry of an order providing that Defendants are not obligated to plead or otherwise respond to the Complaint or to any other application for relief by Plaintiff in this matter ... ORDERED that Defendants’ motion is DENIED.”**

28. May 19, 2021: The Kaul Cases – Notice re: Third Party Witness (Exhibit 20):

**“Phil Murphy -Democrat for Governor One Gateway Center Suite 511 Newark, NJ 07102  
Re: Supply of chemical weapon precursors by New Jersey Governor, Christopher J. Christie, to Syrian rebel forces between 2012 - 2013.**

**Dear Mr. Murphy,**

**I write this letter to bring your attention to an issue that I believe is of immense public interest, particularly to the Syrian American community in New Jersey, and I hope that after reading the letter, you will consider initiating investigatory action.”**

**“I will continue to pursue and publicize this issue until I find the truth, and as suggested in the letter from the ICC, I intend on contacting international authorities to have the matter independently investigated. I hope that if you become the Governor, you will employ state resources to ascertain the culpability of the named offenders. These heinous crimes must not go unpunished, and I will not rest till those responsible are brought to justice.”**

Defendant Murphy has failed, as the law requires, to have these crimes investigated.

29. May 23, 2021: K11-2 – Letter from Kaul to Gurbir Grewal (NJ-AG) (Exhibit 21):

**“On May 22, 2021, between the hours of 8 and 9:30 pm EST, Defendants, Andrew Gregory Kaufman and Doreen Annette Hafner did willfully and knowingly violate an order of the United States District Court for the District of Massachusetts and cause an obstruction of justice.”**

30. May 26, 2021: K11-2 -Letter from Kaul to U.S.D.C. – District Massachusetts (Exhibit 22):

**“On May 22, 2021, between the hours of 8 and 9:30 pm EST, Defendants, Andrew Gregory Kaufman and Doreen Annette Hafner did willfully and knowingly violate an order of the United States District Court for the District of Massachusetts and cause an obstruction of justice.”**

31. May 28, 2021: K11-2 – Letter from Kaul to U.S.D.J. Burroughs (Exhibit 23):

**“The exchange between myself and these nine (9) armed individuals became increasingly hostile, and Dr. Megariotis suggested I permit myself to be arrested. I informed these individuals that any arrest would be illegal, and that I would seek legal redress for the injury. They smirked.”**

32. May 30, 2021: K11-2 – Letter from Kaul to Grewal (Exhibit 24):

**“Please be noticed that I will seek to amend KII-2 in order to bring a RICO/Section 1983 Claims against the State of New Jersey, for falsely arresting/imprisoning/maliciously prosecuting my person on May 28, 2021, and for repeatedly conspiring with the Defendants to use local/state police to attempt to obstruct my prosecution of The Kaul Cases.”**

33. May 31, 2021: Kaul v McGuire – Ethics Complaint (Exhibit 25):

**“THE RESPONDENT [MCGUIRE] LIED TO THE CHIEF OF THE NEW JERSEY STATE POLICE THAT I HAD THREATENED DEFENDANT CHRISTOPHER J. CHRISTIE. THE EVENTS THAT TRANSPIRED AFTER THIS LIE ARE DETAILED IN THE ATTACHED DOCUMENT.”**

34. The Kaul Cases Defendants commenced an illegal conspiracy against Kaul in late 2005/early 2006, because they were jealous that he had invented and successfully performed the first ever minimally invasive outpatient spinal lumbar fusion. A procedure that permitted patients to be discharged home on a same-day basis and substantially reduced the risk of post-operative infection. The Defendant physicians, unable to perform this procedure due to their lack of technical skill, resorted to a **“pattern of racketeering”** in administrative/state/bankruptcy/federal courts and massive schemes of political/judicial corruption that in 2021, have caused a state deputy attorney general to lie to the head of the state police that Kaul had threatened an ex-governor, a lie that resulted in an armed and illegal arrest of a man. In this fifteen (15) year period, the crimes of The Kaul Cases Defendants have unequivocally established the need for a **“Reformation of American Medical Boards”**.

35. On June 7, 2012 Kaul moved the Mercer County Court in Trenton, NJ to appoint a special prosecutor and ad hoc medical board to adjudicate the medical board hearing of June 13, 2012. The motion was denied.

## Statement of Fact

36. The below facts both illustrate and establish The Kaul Cases Defendants criminal state-of-mind, one that for the purposes of these cases, came into existence in or around 2006, and is ongoing.

37. The State of New Jersey, and its executive/legislative/judicial branches, including that of the Office of the Attorney General, have ceased to function as legitimate and statutorily recognized elements of state apparatus, and exist now simply as extensions of the corporate insurance-hospital industry, whose economic/political agendas they serve. The State of New Jersey no longer serves the New Jersey public, a public that it legislatively manipulates/exploits to increase the profits of corporations that conduct business and grand schemes of public corruption in the State of New Jersey. These corporations, in collusion/conspiracy with state/local federal politicians/judges, have facilitated an enslavement of the New Jersey public by ruthless for-profit corporations, such as The Kaul Cases Defendants, Allstate/Geico/TD/HUMC/AHS.

38. From the commencement of K1 (February 22, 2016) The Kaul Cases Defendants crimes have escalated from the filing of false criminal indictments against Kaul (May 2016-Mercer County-NJ) through corruption of state/federal politicians/judges to the use of armed force and wrongful arrests of Kaul (September 21, 2016/May 28, 2021), all purposed to attempt to obstruct justice, provide cover for their massive crimes and prevent Kaul from exposing their felonies.

39. From April 2, 2012, to the present, The Kaul Cases Defendants scheme to eliminate Kaul and obstruct their prosecution by him, has failed. In fact, in April 2012, a member of the Office of the New Jersey Office General stated to Paul Schaff, Esq, a New Jersey lawyer retained by one of Kaul's medical malpractice carriers:

**“He [Kaul] is probably going to pack his bags and leave.”**

40. This comment was made shortly after the wide publicity surrounding the illegal suspension of Kaul’s medical license on April 2, 2012. It evidences a state-of-mind and strategy of the Defendants, that Kaul has proved wrong and has defeated. This wholly unexpected defeat, in conjunction with Kaul’s prosecution of **The Kaul Cases** Defendants, and their recognition of their immense civil/criminal liability, has caused a fracturing of their psychological state, a profound lack of judgment and a realization that their only option is to have Kaul jailed or killed.

41. July 19, 2020: Email-Kaul-Defendants (Exhibit 1):

**“5. Letter from Kaul to Judge John Michael Vazquez re: permission to file twenty-two (22) motions for summary judgment: July 17, 2020.**

**"Kaul believes it is important for the defendants to know that the evidence in this case will continue to be made public with the publication of Kaul's books, documentaries and public speaking engagements. The content will be directed to the top ten corporate shareholders of all defendants publicly traded on the New York Stock Exchange, in order that they be informed as to the risk of share devaluation. Kaul also believes it is important for the defendants to know that he will in due course be initiating legal action in India against the defendants."**

42. Kaul v State of New Jersey/Allstate/Christopher J. Christie (K11-5) in the Indian High Court was publicized and became known to **The Kaul Cases** Defendants on May 2, 2021, and on May 28, 2021, Kaul’s K11-5 NOTICE OF LITIGATION (May 12, 2021) to Defendant Intercontinental Exchange, was publicized and became known to **The Kaul Cases** Defendants.

43. August 26, 2020: Letter from Defendant/NJ DAG McGuire to Defendant/U.S.D.J. Vazquez (Exhibit 2):

**“Dr. Kaufman advises that persons, apparently acting at the direction of Dr. Kaul, appeared at my client’s home yesterday, seemingly to “serve” a copy of Dr. Kaul’s letter to Your Honor concerning the “application for asset seizure warrant,” even though Dr. Kaul is well aware that this office is counsel of record for Dr. Kaufman. Although Dr. Kaufman was not home at the time, another family member was, and the persons who appeared refused that family member’s explicit request to leave the property, stating that they would not leave until they had presented certain papers to that person. When that family member opened the door, the persons appeared to film the family member, again over objection ... I am taking this opportunity to advise you very plainly that you are not to attempt to engage with my client again, either personally or through the use of persons acting at your direction, and that you, and/or persons purporting to act on your behalf should not enter onto my client’s home property again. I am also providing a copy of this letter to the Judge Vazquez, to inform the Court of what transpired yesterday and to advise that, although this office is not requesting the Court take any action at this time, this office reserves the right to make a future application for relief and/or appropriate remedies if you engage in similar conduct in the future.”**

44. The below video proves that Defendant McGuire lied in stating that: **“refused that family member’s explicit request to leave the property ...”**

<https://vimeo.com/manage/videos/460814630>

45. Evidence of Defendant/NJ DAG’s attempt to obstruct justice and Kaul’s prosecution of **The Kaul Cases** Defendants.

46. **August 27, 2020: Letter from Kaul to Defendant/NJ DAG McGuire (Exhibit 3):**



**“However, I must inform you that if it comes to my attention that you were complicit in the Kaufman's lies, then I will have no hesitation in filing an ethics complaint against you with the New Jersey Supreme Court.”**

47. On May 31, 2021, Kaul filed an ethics complaint against Defendant/NJ DAG in the New Jersey Supreme Court:

**THE RESPONDENT LIED TO THE CHIEF OF THE NEW JERSEY STATE POLICE THAT I HAD THREATENED DEFENDANT CHRISTOPHER J. CHRISTIE. THE EVENTS THAT TRANSPIRED AFTER THIS LIE ARE DETAILED IN THE ATTACHED DOCUMENT.”**

48. August 29, 2020: Letter from Kaul to Defendant/U.S.D.J. Vazquez (Exhibit 4):

**“The evidence in this case proves my claims, and not only do the Defendants have no remaining defenses, but they are without credibility, as evident in the letter to Mr. McGuire. Additionally, and with all due respect, there exists no basis for case dismissal. The Defendants, pursuant to RICO, have ensnared themselves in a "net" concocted from their fourteen-year scheme of greed, jealousy, racketeering and obstruction of justice. A net that has no legal rip cord. The KI "net" is but one of the nine (9) current nets of "The Kaul Cases". This number will increase if and when state medical boards deny my applications for licensure. This potential increase is based on my legal right to initiate a new RICO claim pursuant to a "new racketeering injury" i.e., the denial of licensure applications based on the illegal revocation of my New Jersey license on March 12, 2014.”**

49. K11-2 was filed on February 22, 2021, in the United States District Court for the District of Massachusetts, based on amongst other things, Kaul's inability to obtain a license in the State of Massachusetts consequent to the illegal license revocation by K11-5 Defendant, State of New Jersey. The Kaul Cases Defendants' defenselessness, and their

recognition of their inescapable predicament accounts for the desperation of their conspiring with the New Jersey State Police to illegally arrest Kaul on May 27, 2021.

50. April 13, 2021: K11-4 – Email-Kaul-McGuire (Exhibit 5):

Kaul: “Dear Mr. McGuire: Defendants Christie/Hafner/Kaufman, as your email confirms, have acknowledged service of the Summons and Complaint. They are currently representing themselves and will be personally served with a Rule 26 notice. At this point in time, you have no right to participate in this case in any manner, as you are not a member of the CT Bar.”

McGuire: “They have indicated in the interim, through me, that you should serve me as their designated choice for service of any materials in the case, un l their Connecticut counsel is in contact with you. I am not required to be a member of the Connecticut bar to advise you that I am their designated choice to receive process in that case. I repeat that you are not to interact with them further, by sending anyone to their homes or otherwise. Please acknowledge receipt of this message and confirm that you will comply with this second explicit and unambiguous direct on that you are not to send any further process or materials in the Connecticut case to Gov. Christie, DAG Hafner or Dr. Kaufman.”

Kaul: “Dear Mr. McGuire: I intend on prosecuting this case without any delay, and until Defendants Christie/Kaufman/Hafner retain counsel in CT, they will be served with relevant papers. The court ordered deadline for discovery is September 29, 2021.”

McGuire: “I am now informing you, explicitly and unambiguously, and for a third time, that you are to send any materials to me, and that I will relay them to the clients for whom my office has agreed to provide representation. No "delay" can result from that, because service through me will be considered service on them, by their express acknowledgement, so any potentially applicable deadlines that run from service are unaffected. If you choose to

communicate with them directly again, despite what is now a third express warning not to do so, it cannot reasonably be viewed as anything other than an attempt to harass them, and courts will be informed of this, including the court in New Jersey, where I represent these clients.”

Kaul: “The delay pertains to the commencement of discovery, of which the court ordered deadline is September 29, 2021. Instruct Defendants Christie/Kaufman/Hafner to immediately choose a date re: Rule 26, and there will be no need for service on their persons. If I do not receive a response by 1pm EST, notices will be served.”

Kaul: “Dear Mr. McGuire: Please be advised that you have no legal right to participate in this case, and any violation of my rights and the court's discovery order, can and will be used against Defendants Christie/Hafner/Kaufman.”

McGuire: “I have every right as the designee to receive process for these people to communicate with you regarding service issues. Your claim that some potential violation of your rights or of a court order may result is frivolous.”

51. April 27, 2021: K11-4 – Email-Kaul-McGuire (Exhibit 6):

McGuire: “I am aware that you sent a letter to the New Jersey District Court Clerk, indicating that the Connecticut action that was ordered transferred need not be transferred because you plan to refile that pleading in the New Jersey court yourself as a “new” action. As a reminder, I am now representing Ms. Hafner, Gov. Christie and Dr. Kaufman with respect to the claims raised in the Connecticut action and that you now indicate you are filing in the District of New Jersey. Therefore, any pleadings, correspondence or other communications related to those claims should be sent to me. You are not to communicate with my clients. I expect that I may also be notified shortly that I am to represent the New Jersey Board of

Medical Examiners regarding these claims, and I will confirm that as soon as I am notified that is the case.”

Kaul: “Dear Mr. McGuire: Please find attached the following document: 1. Kaul motion for reconsideration/reversal order D.E. 18: April 27, 2021. Until you make any entry in the case, the Defendants will be served directly. Please also be advised that I will be filing an ethics complaint against you, as you lied to me regarding your effort to procure counsel in CT. Please feel free to deny this.”

McGuire: “It is not a requirement that I file a formal appearance on the docket before these persons are my clients. Indeed, at present, given that the transferred Connecticut action has not been assigned any docketing information in New Jersey, and that the new action you say you will file in this district is not yet reflected on the docket, there is not even an open docket under which I could file a notice of appearance. As I have informed you numerous times previously, and instruct you once again, you are not to send anything directly to my clients. As for your frivolous threat to file an ethics complaint, I categorically deny your allegation. First, I am not involved personally in efforts to obtain outside counsel. Second, other persons within the Attorney General’s office are responsible for potential retention of outside counsel and did undertake efforts to procure outside counsel in the event that the Connecticut case went forward, which has proved unnecessary in light of the court’s transfer of the matter. The disclosure of any further details regarding any potential retention could infringe on the attorney-client privilege and is not required. “

Defendant McGuire’s lies and efforts to obstruct justice, were part of The Kaul Cases Defendants overarching scheme to attempt to prevent Kaul from gathering further evidence of the Defendants crimes. Defendant McGuire, in aiding/abetting The Kaul Cases Defendants “**pattern of racketeering**” has incurred civil/criminal liability for all the Defendants crimes. Defendant McGuire, in communicating with Patrick Callahan to have Kaul illegally arrested, did believe that these communications “**could infringe on the attorney-client privilege**” and he

believed his lie to Callahan that Kaul had personally served Defendant Christie would go undetected. He was wrong. Defendant Christie was served by a process server on May 26, 2021 at his law office in Morristown, NJ.

52. May 19, 2021: K11-4 – Order issued by Defendant/U.S.D.J. Vazquez (Exhibit 7):

**“Presently before the Court is the State of New Jersey’s Office of the Attorney General’s motion seeking entry of an order providing that Defendants are not obligated to plead or otherwise respond to the Complaint or to any other application for relief by Plaintiff in this matter. D.E. 12. Plaintiff filed a Complaint against Defendants on April 26, 2021 and paid the appropriate filing fee. D.E. 1. As a result, this Court is not conducting an in forma pauperis screening of the Complaint. Once Defendants are properly served, they should respond as provided by the Federal Rules of Civil Procedure and the Local Civil Rules. For the foregoing reasons, and for good cause shown: ORDERED that Defendants’ motion is DENIED, D.E. 12.”**

The motion filed by Defendant McGuire was denied by Defendant/U.S.D.J. Vazquez, and on May 11, 2021, the United States District Court-District of Massachusetts in K11-2 entered an order granting Kaul’s application for IFP and service by the United States Marshal Service. These events stripped The Kaul Cases Defendants of any remaining vestiges of their obstruction of justice scheme, which in conjunction with their legally defenseless position, left them with no option but to have Kaul illegally arrested and or killed (heart attack/suicide/engineered ‘accident’/murder).

53. May 19, 2021: The Kaul Cases – Notice to Third Party Witness (Exhibit 8):

**“Please be informed that you are a Third-Party Witness in the above matter, consequent to your proximate location/association with Defendant Christopher J. Christie and Third-Party Witness, Mary Patricia Christie. Enclosed are documents containing unrefuted facts, that evidence Defendant Christie’s commission of crimes against humanity, and the racist**

**disposition of his co-defendants. To this point, if you are in possession of any relevant evidence, the law obligates you to ensure its preservation and or lack of spoliation.”**

Defendants Christie/McGuire, in recognizing their utter defenselessness, the certainty of civil/criminal guilt and now the threat of counterclaims from Third Party Witnesses, were forced further into a state of absolute desperation that contributed to their lying to the state police that Kaul had threatened Defendant Christie. This desperation permeated their scheme to have Kaul falsely arrested/imprisoned/interrogated/maliciously prosecuted. The Third-Party Witnesses and or their lawyers, received communications from Defendant McGuire, similar in nature to those sent to Defendant Kaufman’s Third-Party Witness neighbors, in which Defendant McGuire attempted to coopt the Third-Party Witnesses into obstructing justice, and Kaul’s prosecution of The Kaul Cases Defendants. Defendant McGuire/Third-Party Witnesses lawyers have deceived the Third-Party Witnesses into believing the law does not obligate them to produce evidence relevant to Kaul’s claims.

54. May 23, 2021: K11-2 – Letter from Kaul to NJ-AG Gurbir Grewal (Exhibit 9):

**“On May 22, 2021, between the hours of 8 and 9:30 pm EST, Defendants, Andrew Gregory Kaufman and Doreen Annette Hafner did willfully and knowingly violate an order of the United States District Court for the District of Massachusetts and cause an obstruction of justice.”**

**“Defendant's husband, Michael Haefner, opened the door, and told the process server that he wanted to see her identification and that Defendant was printing an order from a court. The process server stated she had never seen any order. She filed the summons and complaint and while telling Defendant's husband her identification was in her car, he called the police. The process server, having served the summons and complaint, began walking back to her car to obtain her identification and was followed by Defendant's husband. Upon arrival at the car, the process server asked Defendant's husband to provide a copy of the**

**order, and he responded that Defendant was printing a copy. He then turned away, and rapidly walked back to the house. As the process server was driving away, a police car entered Defendant's street at high speed.”**

On May 14, 2021, in K11-4, Defendant McGuire filed a motion (D.E. 12) that sought to have Defendant/U.S.D.J. Vazquez enter an order that permitted the Defendants to NOT answer/otherwise plead. On May 19, 2021, the motion was denied (D.E. 16) which is why Defendant Hafner’s husband failed to provide the process server with any order. Defendant Hafner conspired with The Kaul Cases Defendants to perpetrate a scheme, whereby they would call the local police, tell the process server to wait for a document that did not exist, and then have the process server arrested, in order to intimidate/harass them and attempt to prevent Kaul’s prosecution of the case. The Kaul Cases Defendants ongoing scheme of obstruction of justice (2012-present) continues to cause Kaul to be falsely imprisoned and illegally deprived of his human right to a livelihood and freedom.

55. May 26, 2021: K11-2 – Letter from Kaul to the United States District Court for the District of Massachusetts (Exhibit 10):

**“These documents are submitted in response to those submitted by Defendant Allstate (D.E. 16/17), and to alert the Court to the Defendants efforts to obstruct my prosecution of the case.”**

The Kaul Cases Defendants ongoing scheme of obstruction of justice (2012-present) continues to cause Kaul to be falsely imprisoned and illegally deprived of his human right to a livelihood and freedom.

56. May 28, 2021: K11-2-Letter-Kaul-U.S.D.C.-District Massachusetts (Exhibit 11):

**“Obstruction of Justice + Wrongful arrest”**

**The Kaul Cases** Defendants ongoing scheme of obstruction of justice (2012-present) continues to cause Kaul to be falsely imprisoned and illegally deprived of his human right to a livelihood and freedom.

57. May 30, 2021: K11-2 – Letter from Kaul to Gurbir Grewal (NJ-AG) (Exhibit 12):

**“Please be noticed that I will seek to amend K11-2 in order to bring a RICO/Section 1983 Claims against the State of New Jersey, for falsely arresting/imprisoning/maliciously prosecuting my person on May 28, 2021, and for repeatedly conspiring with the Defendants to use local/state police to attempt to obstruct my prosecution of The Kaul Cases.**

**The Kaul Cases** Defendants ongoing scheme of obstruction of justice (2012-present) continues to cause Kaul to be falsely imprisoned and illegally deprived of his human right to a livelihood and freedom.

58. May 31, 2021: Kaul v McGuire – Ethics Complaint (Exhibit 13):

**“THE RESPONDENT LIED TO THE CHIEF OF THE NEW JERSEY STATE POLICE THAT I HAD THREATENED DEFENDANT CHRISTOPHER J. CHRISTIE. THE EVENTS THAT TRANSPIRED AFTER THIS LIE ARE DETAILED IN THE ATTACHED DOCUMENT.”**

**The Kaul Cases** Defendants ongoing scheme of obstruction of justice (2012-present) continues to cause Kaul to be falsely imprisoned and illegally deprived of his human right to a livelihood and freedom.



## Jurisdiction + Venue

### **59. Subject-matter jurisdiction:**

Pursuant to 28 U.S.C. §§ 1331, 1332 and 28 U.S.C. §§ 1441-1452

This Court has subject matter jurisdiction because: **(i)** there exists diversity of citizenship; **(ii)** the amount in controversy exceeds \$75,000; **(iii)** there exists a federal question pursuant to section 1983 of the 1871 Civil Rights Act and the Fourth Amendment of the United States Constitution

### **60. Personal jurisdiction:**

The Defendants, simply by virtue of their occupations and use of the US mail/wires have substantial personal and professional contacts with the State of New York and this federal district:

#### Defendant Christie:

[https://www.washingtonpost.com/local/chris-christies-long-record-of-pushing-boundaries-sparking-controversy/2014/02/10/50111ed4-8db1-11e3-98ab-fe5228217bd1\\_story.html](https://www.washingtonpost.com/local/chris-christies-long-record-of-pushing-boundaries-sparking-controversy/2014/02/10/50111ed4-8db1-11e3-98ab-fe5228217bd1_story.html)

Comment:

**rdorff**

2/11/2014 11:55 AM EST

Christie's tactics are alarmingly similar to those of HUEY LONG. Just a tad more sophisticated. Christie is a dangerous commodity which needs to be rooted out before he can do more harm.

<https://www.nytimes.com/2016/09/26/nyregion/for-cuomo-and-christie-parallel-paths-to-the-top-and-trouble-when-they-got-there.html>

“...alleged acts of petty revenge and bribery at the highest levels of state government seems bad enough.”

Defendant Murphy:

<https://www.governor.ny.gov/news/governor-cuomo-governor-murphy-and-governor-lamont-announce-significant-easing-covid-19>

Defendant McGuire:

Defendant McGuire, in his capacity as the head of the litigation department of the office of the NJ-AG, conducts the business of this section in all states within the United States, including that of New York

Defendant Hafner:

Defendant Hafner, in her capacity as the head of the section of the office of the NJ-AG that deals with actions against physicians, she conducts the business of this section in all states within the United States, including that of New York.

Defendant Grewal:

Defendant Grewal, in his capacity as the NJ-AG does conduct the legal business of the State of New Jersey in all states within the United States, including that of New York.

**61. Venue:**

Venue is proper in this district pursuant to 28 U.S.C. § 1391(b)(2):

**“a judicial district in which a substantial part of the events or omissions giving rise to the claim occurred, or a substantial part of the property that is the subject of the action is situated”**

The events that give rise to the claim commenced with the improper transfer of K1 on April 29, 2016 from the United States District Court-SDNY to the District of New Jersey and continued with the improper transfers of K2 and K3. This Court should know that K11-2 was not transferred from the District of Massachusetts to the District of New Jersey, and neither has K11-1 nor K11-3 been transferred to the District of New Jersey. K11-5 will not be transferred from India to the State of New Jersey, as the state is a Defendant, which is why the District of New Jersey and any courts within the geographic boundaries of the State of New Jersey are forever barred from adjudicating any cases in which Kaul is a plaintiff/defendant/third-party witness or is involved in any legally discernable manner.

## Legal Claims

### Violation of Fourth Amendment Right

62. The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no warrants shall issue, but upon probable cause, supported by oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized.

63. The Defendants, having recognized their immense civil/criminal liability pursuant to The Kaul Cases, in conjunction with Kaul's elimination of Defendant/U.S.D.C.-Newark and its Defendant judges, did conclude that their only option was to have Kaul jailed and or killed. The Defendants, in the discussions/communications preceding Kaul's unlawful arrest, did recognize that the perpetration of their knowingly illegal scheme would constitute an abuse of state power, but calculated that Kaul would not expose it, as in their estimation he would become intimidated, would be jailed for several days (Memorial Day weekend), during which the Defendants planned to have him subjected to lethal force by other prison inmates. The Defendants wanted Kaul to either sustain brain injury or death, in order to stop his prosecution of them. The Defendants knew that their scheme would violate Kaul's Fourth Amendment right, but they were convinced the scheme would cause Kaul either a lethal injury, or one sufficiently severe to render him mentally/physically incapable of even performing basic human functions, or put otherwise, to leave him a vegetative neurological state.

64. The Defendants, in their conspiring to execute their scheme, did assume that having nine (9) armed individuals appear at Kaul's place of work, would cause him to not observe the illegality of the act and to not ask questions of the armed individuals. The Defendants did also conspire to create an extremely hostile/volatile situation purposed to prompt Kaul to resist arrest and thus provide the armed individuals an excuse to use lethal force.

65. The Defendants did not calculate that Kaul would be on the phone with his colleague, Dr. Evangelos Megariotis, whom Kaul would have witness the entire exchange. The Defendants did not calculate that Kaul would video record the incident, and that he would narrate the recording in order that Dr. Megariotis could know the details of the event as it was occurring. In failing to consider the possibility of these facts, the Defendants believed their knowingly illegal violation of Kaul's Fourth Amendment rights would go un-exposed.

66. The Defendants, in conspiring to commit a crime, did instruct individuals involved in the processing of Kaul to subject him to torture-like conditions and deny him basic human rights. The Defendants did not believe that Kaul's collapse in the Morristown police station would be recorded on the internal CCTV system, or that it would occur immediately after Kaul had requested a chair.

67. The Defendants, in criminally abusing state authority, by lying to the Chief of the New Jersey State Police, conducting a knowingly false arrest and then willfully causing Kaul to be subjected to a life-threatening injury, did egregiously and with criminal intent, violate Kaul's fundamental human rights, rights that are recognized internationally and provide Kaul standing in foreign jurisdictions.

68. **Defendant Murphy:**

**Motivation** – Defendant Murphy is motivated to obstruct Kaul's prosecution of **The Kaul Cases**, because: **(i)** he is seeking to secure a second term as the New Jersey governor, for which he requires the economic/political support of **The Kaul Cases** Defendants; **(ii)** he is attempting to provide cover for the crimes (2006-present) of **The Kaul Cases** Defendants, in order to mitigate the immense threat posed to the state treasury by the liability of state actors/agencies subject to prosecution by Kaul; **(iii)** he is exploiting his efforts to mitigate state liability for political gain, in that he recognizes his scheme had the potential to improve his chances of re-election in November 2021; **(iv)** he continues to personally profit from monies generated by the investments of Goldman-Sachs in Defendants Allstate/Geico/TD, and thus any loss to these

Defendants, is a direct personal loss to Defendant Murphy; **(v)** to win a re-election he will require the vote of the New Jersey Syrian/Middle Eastern population, a vote that he recognizes he will lose when Kaul discloses Defendant Murphy's complicity in Defendant Christie's trafficking of chemical weapon components to Syrian rebel forces in 2012-2013.

Role in the scheme – Defendant Murphy, in both his personal/official capacity, communicated directly/indirectly with Patrick Callahan (head of New Jersey state police), and the other Defendants, in the conception/implementation of the scheme to have Kaul illegally arrested, and did issue the final order. Defendant Murphy did recognize the illegality of the order, but issued it nonetheless, as he believed Kaul would not expose the scheme.

Liability – Defendant Murphy, with knowledge and malice aforethought, did violate Kaul's civil/constitutional rights, and is thus liable in both his personal and official capacities.

69. **Defendant Christie:**

Motivation – Defendant Christie's motivation for conspiring to engineer and have perpetrated the scheme is based on economic/political interests, in that: **(i)** he is seeking the Republican nomination, in an attempt to further his life-long political ambition of becoming an American president (his latest goal is the 2024 race), and K11-2, a case that was NOT transferred back to the District of New Jersey, forecloses his ambition; **(ii)** he recognizes that K11-2 will cause the public dissemination of evidence of the crimes (2006-present) of **The Kaul Cases** Defendants; **(iii)** he recognizes that if Kaul is jailed, killed or otherwise rendered mentally/physically incapable of prosecuting K11-2, he will benefit from increased political campaign donations from **The Kaul Cases** Defendants, whose liability would disappear with Kaul's elimination, and whose increased donations would facilitate his political ambitions; **(iv)** he recognizes his immense criminal liability consequent to Kaul's continued, and very public prosecution of his role in the 2012-2013 Syrian genocide, and Defendant Murphy's complicity; **(v)** he recognizes that Kaul's exposure of his crimes will implicate hundreds of other corrupt state/federal politicians/judges, with whom he is now in conflict because of the civil/criminal threat of **The Kaul Cases**, which will expose the 'Fraud on the Court' of the Mercer County case.

Role in the scheme – Defendant Christie’s political distinction from Defendant Murphy is fictitious, and both belong to the same political class that is subservient to corporations such as Defendants Allstate/Geico/TD, upon whom their political/personal survival is dependent. They are thus, one in the same, and have identical interests, that of furtherance of their political/economic agendas, that take no consideration of the public interest, unless it advances their own. Defendant Murphy’s interests are intertwined with those of Defendant Christie, and they conspired in the conception/perpetration of the knowingly illegal scheme to violate Kaul’s civil/constitutional rights and have him arrested, recognizing that the risk to their political careers outweighed the risk of Kaul exposing their illegal scheme. Their calculation proved to be false, as yet again, they miscalculated Kaul.

Liability - Defendant Christie, with knowledge and malice aforethought, did violate Kaul’s civil/constitutional rights, and is thus liable in both his personal and official capacities.

70. Defendant Hafner:

Motivation – Defendant Hafner’s motivation for conspiring to have Kaul jailed/killed or otherwise eliminated, through the conception/perpetration of the knowingly illegal scheme to have Kaul arrested, pertains to: **(i)** her recognition of her professional/civil/criminal liability consequent to Kaul’s prosecution of K11-2 and the exculpation of highly incriminating evidence; **(ii)** her recognition of her willful and knowing abuse of power, in her participation in the commission of **The Kaul Cases** Defendants crimes against Kaul/his family (2006-present); **(iii)** her recognition that because she, as a lawyer, knowingly violated Kaul’s civil/constitutional rights, she, her in-privity husband and their assets are personally liable; **(iv)** her recognition, that she, as a lawyer, has no legal defense to Kaul’s claims in K11-2, a case that remains in the United States District Court for the District of Massachusetts; **(v)** a recognition that K11-5 entirely eliminates the political protection that has thus far insulated her and **The Kaul Cases** Defendants from prosecution.

Role in the scheme – Defendant Hafner, an individual who has devoted her career to destroying the lives of physicians to whom the insurance industry owes money, and an individual who now stands accused in **The Kaul Cases** of racketeering, has become forever unemployable in the

private sector. Her professional record is marked with multiple ethics complaints, and she has become uninsurable in the private sector, and her employment is thus restricted to the State of New Jersey, a Defendant in K11-5, and a Defendant that will dismiss her once Kaul's Indian legal team commences prosecution of K11-5. Defendant Hafner participated in the Defendants' scheme to use New Jersey local/state police to have arrested Kaul's process servers, in order to obstruct process of service and justice. Defendant Hafner's desperate and inescapable predicament, one of her own making, contributed to her willful and knowing violation of Kaul's legal rights, that culminated in having him arrested on May 28, 2021, an event that caused him to sustain a life-threatening injury. Defendant Hafner calculated that the risk of Kaul exposing her involvement in the illegal scheme was outweighed by the risk of her professional annihilation and incarceration, and in this desperate state, she knowingly violated the law to a criminal standard.

Liability - Defendant Hafner, with knowledge and malice aforethought, did violate Kaul's civil/constitutional rights, and is thus liable in both her personal and official capacities.

**71. Defendant McGuire:**

Motivation – Defendant McGuire's motivation for conspiring to have Kaul jailed/killed or otherwise eliminated, through the conception/perpetration of the knowingly illegal scheme to have Kaul arrested, in order to attempt to stop Kaul's prosecution of K11-2, pertains to: **(i)** his recognition that advancement of his professional career is controlled by The Kaul Cases Defendants; **(ii)** his recognition of the risk to his state pension if he fails to obstruct Kaul's prosecution of The Kaul Cases; **(iii)** his recognition of the immense and increasingly inescapable liability caused to The Kaul Cases Defendants consequent to Kaul having had Defendant Christie served with a Summons/Complaint on May 27, 2021 at his law office in Morristown, NJ; **(iv)** his recognition that his reputation as a litigator is ruined, as his clients are close to defeat and Kaul is close to victory; **(v)** his recognition that his ruined reputation has severely restricted his job prospects in the private sector, and the criminal liability of having lied to the head of the New Jersey State Police (prosecutable by the US Attorney for the District of Massachusetts as it violated the jurisdiction/authority of the U.S.D.C.-District Massachusetts).



Role in the scheme – Defendant McGuire occupies a senior controlling position within the office of the NJ-AG, and has been, with Marc Haefner, Esq, the point lawyer/s for all Defendants’ counsel in The Kaul Cases. Defendant McGuire and Haefner have orchestrated multiple telephone/zoom conferences with counsel for Defendants, all of whom knew about the scheme to have Kaul illegally arrested, but none of whom objected or reported it to federal authorities. These individuals are both criminally/civilly liable under the law for aiding/abetting the crime against Kaul, a crime they knew was purposed to jail, kill or render Kaul mentally/physically incapable of continuing his prosecution of The Kaul Cases, but specifically K11-2. Defendant McGuire played a central role in the conception of a scheme that he knew was illegal, but one that he recognized as his only option for stopping Kaul. Before Defendant McGuire issued his final order to Callahan, he secured approval from Defendants Murphy and Grewal.

Liability - Defendant McGuire, with knowledge and malice aforethought, did violate Kaul’s civil/constitutional rights, and is thus liable in both his personal and official capacities.

**72. Defendant Grewal:**

Motivation – Defendant Grewal, a lawyer previously appointed (2016) to the Bergen County prosecutor’s office by Defendant Christie, has economic/political/professional interests that are immutably aligned with those of Defendants Murphy/Christie/Hafner/McGuire and with The Kaul Cases Defendants.

Role in the scheme – Defendant Grewal consented to the scheme, despite recognizing its illegality and the liability/exposure that this would confer on him personally. From the moment the nine (9) armed individuals commenced the scheme, Defendants Grewal/McGuire were provided constant updates on the specifics of the illegal arrest. The scheme, however, did not proceed as planned or expected, and there came a point where the armed individuals realized that they were acting on lies that Defendants Grewal/McGuire had told Callahan. In the Mendham Township police department, the process server told these individuals that she had served Defendant Christie in K11-2, but yet they failed to release Kaul, on orders from Defendants McGuire/Grewal. These individuals then transported Kaul to the Morristown police

department, where they were ordered to continue his illegal arrest and deny him basic human rights. However, after his blood sugar and blood pressure were measured and seen to be high, and after he publicly requested a chair, a request that was publicly denied with the comment: “No, you are in jail”, he collapsed to his right and his body impacted the floor. Defendants Grewal/McGuire were informed of these events, and the armed individuals refused to play any further part in the Defendants scheme, recognizing the fall could have killed or paralyzed Kaul. A death of a high-profile Indian doctor with two children in a New Jersey police station, arrested illegally and as part of a state/insurance industry orchestrated scheme of retaliation/harassment/intimidation would result in the decimation of many American political/judicial careers, and a case that the Indian government and Central Bureau of Investigation/Federal Bureau of Investigation would investigate. Defendant Grewal, since his appointment as the NJ-AG has functioned as a central cog in the racketeering enterprise, that is the State of New Jersey/NJ-AG, a criminal enterprise orchestrated by The Kaul Cases Defendant Allstate/Geico. These for-profit corporations have hijacked the state’s legislative/judicial/executive branches, through massive schemes of bribery/public corruption, and have eliminated, through license suspension/revocations and incarcerations, hundreds of physicians/healthcare providers, to whom they money. Defendant Grewal has signed every order in all of these actions and recognizes that once The Kaul Cases Defendants are defeated, many of these individuals will file suit to have their cases re-opened and independently examined.

Liability - Defendant Grewal, with knowledge and malice aforethought, did violate Kaul’s civil/constitutional rights, and is thus liable in both his personal and official capacities.

**42 U.S. Code § 1983**

**Civil action for deprivation of rights**

73. 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.

**74.** The Defendants scheme to arrest Kaul and knowingly violate his civil/constitutional rights with malice aforethought, in retaliation for Kaul having served K11-2 Defendants Hafner/Christie/Kaufman/Heary, caused immense emotional distress, public humiliation and actual physical harm to Kaul. As a direct consequence of the violent fall in the Morristown police department, Kaul has begun experiencing severe headaches and neck pain. The Defendants had a duty to protect Kaul's person but acted to the contrary in seeking to cause physical harm to Kaul, in order to render him mentally/physically incapable of prosecuting The Kaul Cases.

75. The Defendants, in a state of desperation, conceived a scheme that they knew was illegal and did constitute a section 1983 violation of Kaul's civil/constitutional rights. The scheme was based on a lie that Kaul had threatened Defendant Christie. This lie was concocted by Defendants McGuire/Hafner/Christie and condoned by Defendants Murphy/Grewal, before being transmitted to Patrick Callahan. The Defendants use of the US wires to transmit knowingly fraudulent information in furtherance of their scheme constitutes the RICO predicate acts of wire fraud. The crimes were committed by state actors, using state apparatus/function/authority as cover, in exactly the same manner that The Kaul Cases Defendants illegally suspended/revoked (April 2, 2012/March 24, 2014) Kaul's New Jersey license. The "pattern" (2006-present) of the crimes of The Kaul Cases Defendants includes, amongst other things, an abuse of power and the use of the executive/legislative/judicial branches of the State of New Jersey to provide cover and conduits for the commission of their

criminal “**patterns of racketeering**” and human rights violations. **The Kaul Cases** Defendants lied (April 2, 2012) that Kaul was not qualified to perform minimally invasive spine surgery and then lied that he had threatened Defendant Christie (May 27, 2021). In between these two dates were thousands of other lies and crimes. Almost a decade of crime/lies, the reason and consequences of which are detailed/exposed in **The Kaul Cases**.

76. The Defendants, in receiving updates of the illegal arrest of Kaul, did receive information from the armed individuals that a process server had served the K11-2 summons/complaint on Defendant Christie, and that Kaul had not threatened Defendant Christie, did still continue to perpetrate their scheme, and illegally detain Kaul with handcuffs.

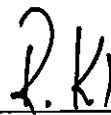
77. The Defendants section 1983 violation was neither accidental nor lacking in knowledge of its illegality but was premeditated and perpetrated in the face of evidence that exposed the Defendants massive lie that Kaul had threatened Defendant Christie. The Defendants violation was conducted with malice aforethought, as was/is every legal proceeding/multiple refusal to reinstate Kaul’s illegally revoked NJ license, that commenced occurring on February 3, 2010 and are ongoing. The Defendants violations have occurred in administrative/state/bankruptcy/federal courts within the geographic boundaries of the State of New Jersey and have also restricted Kaul’s access to impartial justice in the United States Court of Appeals for the Third Circuit and the United States District Court for the District of Columbia.

## Relief

1. Referral of Defendants to the Criminal Division of the United States Department of Justice.
2. Compensatory, consequential and punitive monetary damages.
3. Declaration that the within pled facts constitute a prime facie violation of Kaul's civil rights.
4. Declaration that the within pled facts constitute irrefutable evidence of a conspiracy to violate Kaul's civil rights.
5. An immediate order: (i) restraining any and all agencies/actors of the State of New Jersey from initiating, pursuing or otherwise administering any legal matter against Kaul; (ii) compelling the immediate reinstatement of Kaul's unrestricted New Jersey license to practice medicine and surgery.

I certify that the above facts are true and accurate to the best of my knowledge and that if it is proved that I willfully and knowingly misrepresented the facts, then I will be subject to punishment.

Dated: June 9, 2021



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Richard Arjun Kaul

# Appendix C

July 6, 2021

Gary Gensler  
SEC Chair  
Securities and Exchange Commission  
100 F Street NE  
Washington, DC 20549-5631

**Re: Kaul v Boston Partners – K11-2  
21-CV-10326  
Securities Fraud**

Dear Mr. Gensler

I write this letter to alert the SEC to the fact that in a period from February 22, 2016 to the present, the Defendants Allstate/Geico/TD/Boston Partners/State Street Capital have conducted, and continue to conduct, an ongoing scheme of securities fraud, purposed to conceal their liability in **The Kaul Cases** (identified in **Exhibit 1**). On June 25, 2021, in K11-2, Defendant Boston Partners, Inc, did admit such an offense (**Exhibit 2**):

**“Plaintiff sent a letter to the CEO of Boston Partners in November 2018 to notify the company of Allstate’s alleged failure to disclose; and, in Q1 2020, Boston Partners sold the majority of its Allstate shares, and the price of the stock dropped subsequent to the sale.”** (K11-2:D.E. 39 Page 5 of 6).

Defendant Boston Partners, Inc, upon being made aware of the Defendants securities fraud violation, did not, as the law requires, report the offense to the SEC or the market.

On June 15, 2021, I did file a lawsuit (K11-9-**Exhibit 1**). in the United States District Court for the Southern District of New York , in which Defendant/NJ AG Gurbir Grewal is identified as an individual who participated in a scheme that violated my civil rights. The Complaint was widely publicized on June 20, 2021 and brought to the attention of the Defendants.

On or about July 2, 2021, it was reported in the press that Defendant Grewal was prematurely relinquishing his position as the AG and was reported to commence a position within the SEC enforcement division (**Exhibit 3**).

It is my position that the Defendants, in seeking to mitigate their securities fraud related civil/criminal liability, did conspire to have Defendant Grewal appointed to this position. This constitutes evidence, that will be submitted into K11-2, in support of an **“ongoing pattern of racketeering”**, that has now extended from the NYSE into the SEC.

I would request, that in light of these facts, the SEC reject his appointment, in order to mitigate its exposure, and that of Intercontinental Exchange, in K11-2 and K11-5.

A copy of this letter will be forwarded to the US Attorney, and to the CEOs of the S/P 500.

I thank you for your attention to this matter.

Yours sincerely



Richard Arjun Kaul, MD



# Appendix D

28a. Kaul did maintain proper patient records, and a signed consent form for patient GH was submitted with the post-trial submission on October 15, 2013, with an affidavit from Kaul's director of nursing, Kathleen LaCouture, excerpts of which are:

**“It has been brought to my attention that the State has claimed that Mr. Housman’s consent forms were not signed, and the State has produced unsigned versions.”**

**“Upon review of the patient file for George Housman, I located the signed “Consent For Pain Management Procedure” and “Consent to Spinal Surgery” forms both of which are dated December 9, 2011.”**

**“To the best of my knowledge, these forms would have been among the patient file that I originally printed and produced to the State of New Jersey.”**

**“ I do not know why the State would not have these documents in their possession” – Reference: Folder 15 (NPDB) – 131014-Certification LaCouture**

28b. Hafner did have the signed consent form in her possession, but chose to withhold that piece of evidence, in order to support her false claim that Kaul did not maintain proper patient records. However, what is even more telling, is the fact that Solomon received another copy of the signed GH consent, but perpetuated Hafner's lie, by falsifying his opinion, and stating that consent forms were unsigned. The only form that was allegedly unsigned was that of patient GH. It was a form, not forms, and the issue was addressed with LaCouture's affidavit. This pattern of dishonesty also manifested itself with Hafner's false claim that she never received Randolph's letter, dated August 30, 2012, a lie that Solomon used to exclude a critical part of his letter, that confirmed Kaul did not require alternative privileges. Kaul did NOT violate N.J.A.C. 13:35-6.5

*29. Petitioner also charged respondent with the failure to properly bill for his services, in violation of N.J.S.A. 45:1-21(b). No proofs were offered, and, accordingly, this charge is dismissed.*

29a. Hafner filed a baseless charge, one for which she knew she new she required hard evidence, unlike the majority of her claims, which depended simply on the opinions of physicians and patients, all of whom were motivated to have Kaul's license revoked. Przybylski and Kaufman were local market competitors, and as is now evident in Kaul v Christie, conspired with Hafner and a group of other spine doctors to have Kaul's license revoked. Of the six patients that testified against Kaul, one, JZ, has now become his witness in Kaul v Christie, while JJ, TZ, SS, GH and LM all had pending lawsuits, and all

of whom, as the clinical notes indicate, improved with the care they received from Kaul.

*30. Similarly, petitioner charged respondent with failure to comply with subpoenas for patient records, in violation of N.J.S.A. 45:1-18, and for failure to cooperate with the Board, in violation of N.J.A.C. 13:45C-1.2 and -1.3(a)(5). No proofs were offered, and, accordingly, these charges are dismissed.*

30a. This statement illustrates the malfeasance and official misconduct, that permeated this case from its ill-conceived and ill-intended beginnings. To understand this necessitates a chronological recitation of relevant events:

- (a) On April 2, 2012 the medical board filed a complaint seeking to suspend or revoke Kaul's medical license, based on allegations that he was not qualified to perform minimally invasive spine surgery and had violated the alternative privileges regulation.
- (b) On May 9, 2012 Kaul entered into a consent order with the medical board, in which he agreed to temporarily limit his practice to interventional spinal procedures, and in which it was agreed that he could apply for hospital privileges to perform minimally invasive spine surgery
- (c) Kaul commenced discussions with a Bayonne Medical Center to procure hospital privileges, received an application and initiated the credentialing process.
- (d) On May 18, 2012 Kaul's attorney, Robert Conroy (deceased) was advised by the Deputy Attorney General, Doreen Hafner, that Eric Kanefsky, the acting director of the Division of Consumer Affairs, was intending on filing a motion to suspend Kaul's CDS prescribing license. The purpose was to sabotage Kaul's efforts at procuring hospital privileges, as Kanefsky knew that without the CDS license Kaul could not obtain privileges.
- (e) On May 22, 2012 Kanefsky unilaterally filed the motion, and circumvented the proper procedure, which would have involved a hearing before the board. Kanefsky illegally obtained the property of Kaul's CDS license, without Kaul having been afforded due process. The tendentious and fraudulently colored argument used by Kanefsky, was that because the patients upon whom Kaul had operated, had received anesthesia, and that because Kaul was allegedly not qualified to

perform the procedures, that Kaul therefore, had violated the statute pertaining to the dispensation of controlled substances.

- (f) Kaul indicated that he would file initiate legal action against Kanefsky, alleging that he had violated Kaul's due process rights, and had acted outside of the law, in unilaterally suspending Kaul's CDS license.
- (g) In retaliation Kanefsky filed a motion with the board, on or about May 27, 2017, to rescind the consent order, based on false allegations that Kaul had not modified his website and had not responded to subpoenas.
- (h) On June 7, 2012 Kaul filed Complaint in Mercer County Superior Court that sought the appointment of a special prosecutor and ad hoc medical board. The request was denied.
- (i) On June 13, 2012 Kanefsky's motion to rescind the consent order was granted, based on the website and subpoena allegations, and Kaul's license was suspended.

30b. The subpoena and website allegations were simply pre-texts to rescind Kaul's license. There was no truth to Kanefsky's claims, as was proved in the administrative law proceedings. This was an early example of one of the many falsehoods, upon which the entire case was fabricated.

*31. Based upon the facts adduced and the legal principles cited above, it has been proven, well beyond a preponderance of the credible evidence, that respondent not only poses a danger to the public, but has violated several statutes and regulations governing the practice of medicine and surgery in this state.*

31a. Solomon's opinion is a fraud that was perpetrated as part of a conspiracy the evidence of which became increasingly apparent with the passage of time. Kaul v Christie lays bare the rackets in which private parties purchased corrupt officials, in quid pro quos, that resulted in the revocation of Kaul's license. Solomon was part of this racket, and was named a Defendant in the Original Complaint, but claimed absolute immunity, and was released from the action. However, the extent of his corrupt involvement in the case has become forensically apparent with the creation of 'The Solomon Critique', in which he omitted, misrepresented and mischaracterized trial evidence, and facilitated perjury, on two hundred

and fifty (250) occasions. His opinion does not bear truthful witness to the evidence, which proves that Kaul:

- (a) Was qualified to perform minimally invasive spine surgery.
- (b) Competently performed minimally invasive spine surgery.
- (c) Complied with the alternative privileges regulation.
- (d) Complied with the insurance requirements of medical licensure.
- (e) Truthfully represented his qualifications and skills to the public and his patients.
- (f) Complied with all state and federal healthcare related regulations and law.
- (g) Was credentialed at multiple surgical facilities to perform minimally invasive spine surgery.
- (h) Organized his minimally invasive spine surgery practice, in compliance with all New Jersey healthcare related statutes and regulations.

31b. Solomon's abuse of the evidence caused him to find facts that fitted Hafner's fraudulent narrative. His failed to provide any specific factual detail in his credibility determinations, and his reference to witness demeanor was without substance. For example, he never described any particular mannerisms or patterns of behavior that caused him to question the credibility of Kaul's witnesses. He never stated, for example, that when the witnesses answered certain questions their demeanor changed or they became suspiciously nervous. Solomon simply referenced demeanor as a basis for his credibility determination of Kaul's witnesses. Similarly, Solomon impugned the credibility of Kamson and Remley, because of their professional involvement with Kaul in a potential educational/charitable venture, which involved The Spine Africa Project and The Society for Advanced Spinal Intervention. Solomon incorrectly asserted that the viability of the venture depended on Kaul retaining his New Jersey license. This statement was false, as the venture was purely educational, and would have involved Kaul teaching doctors in Africa how to perform minimally invasive spine surgery, for which he did not require a New Jersey license. Solomon speculated on this proposition, in the knowledge that no there was no evidence in support of it. His credibility determinations were baseless, and bore no relation to the law to which he cited. Solomon's outrageous display of hypocrisy, in referring to Kaul as a 'danger to the public', is a trait usually found in those who are corrupters, and habitual abusers of the power of public office. Solomon proved that he is in fact, a far more pernicious danger to the fabric of society, a fabric that depends on an honest judiciary, a judiciary that does not sell its opinions or allow its members to convert their benches into racketeering enterprises. Solomon conducted himself with malicious intent, and a mindset that is nothing short of criminal. He will be held

accountable.

*32. He never should have performed any spinal surgeries, whether they were called minimally invasive or open, given his lack of education and training. The fact that he performed such surgeries, without the requisite education and training, and in disregard for the safety of several of the patients who testified on behalf of petitioner, his disregard of the above statutes and regulations governing the practice of medicine and surgery in this state, and his prior involvement with the Board, warrant nothing less than the revocation of his medical license.*

32a. Solomon's final paragraph ignores the evidence that proved:

- (a) That Kaul was qualified to perform minimally invasive spine surgery,
- (b) Had more training than Przybylski and Kaufman,
- (c) Was noted to be a skilled surgeon by Kamson and Remley, who had observed him operating.
- (d) That his surgeries changed the lives of many patients, a number of whom testified that their pain disappeared after the procedures he performed
- (e) Kaul followed the advice of experts in healthcare compliance, in the organization and administration of his minimally invasive spine surgery practice.
- (f) That the real reason for the revocation of Kaul's license was political corruption and professional jealousy, because there is no other explanation as to why Kaul was permitted to perform minimally invasive spine from 2002, and it only became an issue in 2010, when Christopher J. Christie became the Governor. Solomon knew this, because he was a critical part of the racket.

U.S. DISTRICT COURT  
DISTRICT OF COLUMBIA  
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## **The McNulty Analysis**

**A critical review of the opinion of Judge Kevin McNulty, dated  
February 22, 2019, in the matter of Kaul v Christie: 16-CV-  
02364 – K1**

[www.drrichardkaul.com](http://www.drrichardkaul.com)

March 15, 2019

Honorable Kevin McNulty  
UNITED STATES DISTRICT COURT  
District of New Jersey  
50 walnut Street  
Newark, NJ 07102

**Re: Kaul v Christie, et al.,  
Docket No. 16-CV-02364  
Kaul analysis of opinions of Judge McNulty (D.E. 300 + 301 + 303 + 304)**

Dear Judge McNulty,

Please find submitted, for no reason other than to demonstrate the incorrectness and errors of the above opinions. In the preparation of this document, which demonstrates that your opinion is wrong, I ("Kaul") have cross referenced your opinions with the entire case docket, in order to identify errors of fact. Kaul has analyzed the law cited in support of your opinions, and has demonstrated it to be unresponsive. The organization of the analysis shadows that of your opinion (D.E. 300), except for the initial section, which is a table that provides in a convenient format, the information regarding the location within the Second Amended Complaint, of fact relevant to the claims. This table, entitled, 'Claim Specificity Table' is referenced throughout the analysis in the context of your criticisms regarding purported factual deficiencies of claim pleading.

The information within the document has been organized to juxtapose elements/statements/claims asserted in your opinions, with the elements/statements/claims asserted within the Second Amended Complaint and the entirety of the case file. The purpose of this is to demonstrate what I believe has been the defendants/Court's three (3) year strategy to obstruct Kaul's prosecution of the case. These tactics included, but were not limited to:

1. Deny Kaul any discovery.
2. Enter orders that continually misrepresented the pled parties + legal claims + exhibit page number of the previous revisions of the SAC, in order to delay the process.
3. Omit any reference to Rule 9, in the knowledge that although the SAC and the pleadings contained plausibly pled fact sufficient to meet the required pleading standards, it would be used as the 'fallback' basis for a dismissal with prejudice. The defendants/Court employed tactics 1 + 2 with the expectation that Kaul would "**pack his bags and leave**", and avoided any reference to Rule 9, with the understanding that if

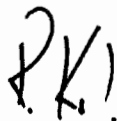


Kaul did not “**pack his bags and leave**”, Rule 9 would become the basis for the dismissal with prejudice.

4. Conceal from Kaul the conflicts of interest that existed by virtue of the fact that: (i) Judge McNulty had represented two of the defendants when he was the director at Gibbons, PC law firm; (ii) Gibbons, PC law firm, with which Judge McNulty is a commercial beneficiary, represented defendants Washburn + NJMG; (iii) Judge McNulty is the brother-in-law of US Senator Charles E. Schumer (D-NY), a senior American politician who has within the last three years received substantial monetary donation from the insurance industry, of which certain defendants are members; (v) the firm at which Judge Mannion was a partner, sued Kaul in 2005. The matter was settled.
5. Asserting that the Court would deny Kaul the right, if so required, to amend the Second Amended Complaint. This is based on the fact that Kaul by sending a letter to a journalist at USA Today (D.E. 243), a Gannet Media owned entity, in which he asserted a potential for perverting the course of justice, in that Gannett Media owns defendant NJMG, had foreclosed his right to have the Court grant permission to amend the SAC.

I thank you for your consideration

Yours sincerely

A handwritten signature in black ink, appearing to read 'R. Kaul'.

Richard Arjun Kaul, MD

[www.drrichardkaul.com](http://www.drrichardkaul.com)

March 17, 2019

U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
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2019 MAR 18 P 3:10

Honorable Kevin McNulty  
United States District Judge  
District of New Jersey  
UNITED STATES DISTRICT COURT

Re: **Kaul v Christie, et al.,**

**Docket No. 16-CV-02364 – K1**

**Application to: (i) Reverse Order (D.E. 300); (ii) Grant Discovery; (iii) Grant Amendment of SAC; (iv) Transfer case to the S.D.N.Y.; (v) Refer Defendant Stein to NJ Ethics Committee**

Dear Judge McNulty.

Please accept this letter in support of my (“Kaul”) application to this Court for the following relief:

1. **Reverse Order (D.E. 300):** Reverse the Order transmitted to Kaul on February 25, 2019, but stamp dated February 22, 2019 (D.E. 300), and deny the defendants’ Omnibus + Supplemental 12(b)(6) motions to dismiss. The bases for reversal are the errors of fact and law, as detailed in a document entitled ‘The McNulty Analysis’, that was filed with the Court on March 18, 2019.
2. **Grant Discovery:** Immediately grant Kaul discovery on all defendants and third-party witnesses, and order the defendants to submit to the Court within two weeks, a proposed discovery schedule.
3. **Grant Amendment of SAC:** Alternatively, and without Kaul admitting to any pleading deficiencies in the Second Amended Complaint, grant Kaul permission to amend all claims (federal-law + state-law) of the Second Amended Complaint within sixty days of the commencement of discovery. See Gottreich v. San Francisco Inv. Corp., 552 F.2d 866 (9<sup>th</sup> Cir. 1977), in which the Court recognized that demanding specific data about each security traded over a two-year period was inappropriate at the pleading stage, before discovery had commenced. See also Eaby v. Richmond, 561 F.Supp. 131 (E.D. Pa. 1983). In this case the Court permitted a sixty-day (60) period of discovery, when it found that the complaint inadequately alleged only that defendant used the mails to defraud the plaintiff. It did not dismiss the complaint, but granted the plaintiffs the opportunity to commence discovery and amend their complaint within sixty (60) days. The Court has suggested that Kaul submit a “**properly supported motion to amend the**

**complaint within 30 days after the date of this Order and Opinion.”** (D.E. 301 Page ID 8219). Kaul respectfully declines this offer, for the reasons stated in ‘The McNulty Analysis’. Page 61 ¶136, **“It is the Court’s belief and intention that Kaul will re-submit an amended state-law complaint, and that the case will then be shunted into a corrupt New Jersey state court, a place that justice, as least as far as Kaul is concerned, has long vacated ... are an attempt to keep the case away from the Third Circuit of Appeals, by ‘enticing’ Kaul with the promise of yet another amendment, but one, limited to the statem law claims.”** Kaul respectfully asserts that this offer is motivated not by a desire to do justice, but by an ill-intended effort to ‘cover-up’ the defendants’ crimes. That will not happen.

4. **Transfer case to the S.D.N.Y.:** Transfer the case back to the United States District Court for the Southern District of New York, on the basis that this Court is conflicted for the reasons set forth in ‘The McNulty Analysis’.
5. **Refer Defendant Stein to NJ Ethics Committee:** Refer Defendant Lewis Stein to the Ethics Committee of the New Jersey Supreme Court for having lied to the United States District Court (D.E. 288 Page ID 6751).

For the reasons set forth in ‘The McNulty Analysis’ Kaul believes the above measures will legitimately serve the interests of justice and equity, and will cause the truth of this matter to be made available to the public, whom K2 defendant, NJBME, profess to want to **“protect”**. Kaul believes the American public have a right to know about the profound corruption of the American healthcare system by corrupt physicians + politicians + lawyers + insurance salesmen. This case of immense public interest, as is the so called **“College Bribery Scam”**, a case in which wealthy privileged professionals (CEOs + lawyers + judges + politicians), bribed admission officers in order to have their children admitted into these schools.

Finally, and please excuse Kaul for elaborating on this point, but the defendants in the early days of the case, argued that because they belonged to the socio-economic strata identified in the **“College Bribery Scam”**, they were somehow immune from the moral pitfalls of abuse of power + privilege + money, and thus Kaul’s claims were **“fantastical”** and **“vast”** among other things. Kaul is sure that if he had been the party alleging the facts of the **“College Bribery Scam”**, he would have come under the same **“fantastical ... vast”** criticisms, that he faced when he filed K1 + K2. Please find below some of Kaul’s statements/arguments in response to the defendants’ **“power ... privilege ... money”** defenses:

- (a) **“The mob corruption that New Yorker and US Attorney, Herbert Stern, sought to eradicate in the 1960s and 70s was almost complete, except some of its familial remnants metastasized into the organs of medicine, law, politics and white-collar business. The cancer cells became more cunning, and more lethal, which is why this case, described on June 13, 2012 by the Plaintiff’s attorney, Robert Conroy, with the phrase, “Seldom do there come cases in which the very fundamental nature of the**

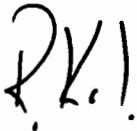
**board is at issue. This is one of them.”, should become the smart bomb that terminates the malignant cells.” (D.E. 179 Page 2261).**

- (b) **“To illustrate this point of public and private function, a police officer who engaged in private security work while on public property and time, would have no immunity to any claims of tort, fraud, bribery, kickbacks, extortion and obstruction of justice. He would forfeit his assets and go to jail. The same legal standard ought to be applied, regardless of the color of the collar, the size of the bank vault or the perpetrator’s title.” (D.E. 180 Page 3215).**

For the reasons set forth above and for those detailed with ‘The McNulty Analysis’, Kaul respectfully requests that the Court grant the above stated relief.

I thank you for your consideration.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R. Kaul', with a small flourish at the end.

Richard Arjun Kaul, MD  
cc: All Counsel via e-mail  
Judge Steven C. Mannion  
Clerk of the Court

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# 19 CV 3046

UNITED STATES DISTRICT  
COURT FOR THE SOUTHERN  
DISTRICT OF NEW YORK

RICHARD ARJUN KAUL, MD  Plaintiff  v.  SENATOR CHARLES E SCHUMER, ALLSTATE INSURANCE COMPANY, GEICO, TD BANK, NA GIBBONS, PC, GANNET CO., INC.  Defendants	CIVIL ACTION  COMPLAINT AND DEMAND FOR JURY TRIAL
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For reference purposes:

K1: Kaul v Christie: 16-CV-02364

K2: Kaul v Christie: 18-CV-08086

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**UNITED STATES DISTRICT  
COURT FOR THE SOUTHERN  
DISTRICT OF NEW YORK**

<p>RICHARD ARJUN KAUL, MD</p> <p>Plaintiff</p> <p>v.</p> <p>SENATOR CHARLES E SCHUMER, ALLSTATE INSURANCE COMPANY, GEICO, TD BANK, NA GIBBONS, PC, GANNET CO., INC.</p> <p>Defendants</p>	<p>CIVIL ACTION</p> <p>CERTIFICATION OF PLAINTIFF</p>
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I, Richard Arjun Kaul, MD, of full age, certifies and says:

I am the Propria Persona Plaintiff

I make this certification in support of the Plaintiff's Complaint

Attached as Exhibit 1 is a true and accurate copy of the following document:

1. Exhibit 1 -- E-mail from Robert Conroy, Esq to K2 Defendant Hafner

I certify that the foregoing statements made by me are true to the best of my knowledge. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: April 4, 2019

  
 Richard Arjun Kaul, MD

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Plaintiff Richard Arjun Kaul, MD (“Kaul”) brings this action against Defendants: (1) Senator Charles E. Schumer (“Schumer”); (2) Allstate Insurance Company (“Allstate”); (3) GEICO (“GEICO”); (4) TD Bank, NA (“TD”); (5) Gibbons P.C. (“Gibbons”); (6) Gannett Co., Inc. (“Gannett”) to redress Plaintiff’s economic and reputational injuries due to the Defendants’ illegal scheme to obstruct Kaul’s prosecution of the matter of K1. Plaintiff’s allegations are based on his own experiences and personal knowledge, his research, publicly available articles, studies, reports and other sources, a reasonable inquiry under the circumstances, and on information and belief. Plaintiff’s allegations are likely to have further evidentiary support after a reasonable opportunity for further investigation and discovery.



## I. PARTIES

1. Plaintiff, RICHARD ARJUN KAUL, MD, is a resident of the State of New York, and is the Plaintiff in the matter of K1. His address is 440 c Somerset Drive, Pearl River, New York 10965.
2. Defendant Senator CHARLES E. SCHUMER is an American politician serving as the senior United States Senator from New York, and is the brother-in-law of United States District Judge, Kevin McNulty. His address is 780 Third Avenue, Suite 2301, New York, New York 10017
3. Defendant ALLSTATE INSURANCE COMPANY is an American corporation traded on the New York Stock Exchange, that is alleged to have, as part of a quid pro quo scheme, funneled bribes to Defendant Schumer and Judge Kevin McNulty, disguised as 'political campaign donations' and 'legal fees'. It's corporate address is Northbrook, Illinois, and it trades on the New York Stock Exchange.
4. Defendant GEICO is an American corporation traded on the New York Stock Exchange, that is alleged to have, as part of a quid pro quo scheme, funneled bribes to Defendant Schumer and Judge Kevin McNulty, disguised as 'political campaign donations' and 'legal fees'. It's corporate address is Chevy Chase, Maryland and it trades on the New York Stock Exchange.
5. Defendant TD BANK, NA, is a Canadian bank, whose American headquarters are in Cherry Hill, New Jersey. It is a company that is publicly traded on the New York Stock Exchange, that is alleged to have, as part of a quid pro quo scheme, funneled bribes to Defendant Schumer and Judge Kevin McNulty, disguised as 'political campaign donations' and legal fees'.
6. Defendant GIBBONS P.C. is an American law firm with offices located in New York, Newark, Trenton, Philadelphia, Wilmington, Washington, DC, West Palm Beach, whose website indicates that "**Gibbons has been selected as the best law firm and as a top three lobbying firm in New Jersey.**" Judge McNulty remains a commercial beneficiary of the law firm. It's address is One Pennsylvania Plaza, 37<sup>th</sup> Floor, New York, New York 10119-3701
7. Defendant GANNETT CO., INC. is an American media conglomerate, that is publicly traded on the New York Stock Exchange, with a portfolio that includes USA today, and K1/K2 defendant North Jersey Media Group, currently known as "**Fourth Edition**". The corporation is a client of Defendant Gibbons. It's corporate address is Tysons Corner, Virginia.

## II. JURISDICTION AND VENUE

8. U.S.C. § 1331 because Plaintiff's claims arise under federal law, and under 18 U.S.C. § 1964(c) because this action alleges violations of the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1962. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1337 because this action alleges violations of an Act of Congress regulating commerce or protecting trade and commerce against restraints and monopolies. And 15 U.S.C. § 4 and § 16 confer subject matter jurisdiction on this Court over claims brought under the Sherman Act. This Court also has supplemental jurisdiction over the state law claims in this action pursuant to 28 U.S.C. § 1367. This Court also has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1332(d)(2)(A), (5), because Plaintiff is a citizen of a different state to certain Defendants, the aggregate amount in controversy exceeds seventy-thousand dollars.

9. Personal Jurisdiction. The Court has personal jurisdiction over each Defendant. Each Defendant has transacted business, maintained substantial contacts, and/or committed overt acts in furtherance of the illegal scheme and conspiracy throughout the United States, including in this district. The scheme and conspiracy have been directed at, and have had the intended effect of, causing injury to persons residing in, located in, or doing business throughout the United States, including this district. This Court also has personal jurisdiction over all Defendants pursuant to Fed. R. Civ. P. 4(k)(1)(A) because they would be subject to the jurisdiction of a court of general jurisdiction in New Jersey.

### III. PRELIMINARY STATEMENT

#### Professional Jealousy + Political Corruption

10. This case is about political and judicial corruption within the American politico-legal establishment, with a central theme that pertains to bribery induced perversions of the course of justice. This case came into being from a series of medical innovations and legal events whose true genesis commenced in approximately 2005/2006. A conflagration of events ignited consequent to Kaul performing the first outpatient minimally invasive spinal fusion in approximately February/March 2005, an event that sparked the medical equivalent of the American Civil War, a fight between neurosurgeons and minimally invasive spine surgeons as to who was qualified to perform these procedures. The Spine Turf Wars, as they came to be known, expanded rapidly, and came to include senior American politicians in both state and federal government, into whose ravenous campaign coffers the neurosurgeons poured their bribes. These monies were part of a series of quid pro quo schemes intended to have the minimally invasive spine surgeons, like Kaul, eliminated from the practice of minimally invasive spine surgery. Like an out-of-control California forest fire, the professional battles began to involve members of the insurance sector, hospital corporations and the outpatient surgical community, in a fight over one of the most economically enhanced sectors of American healthcare.

#### Fraud + Obstruction of Justice

11. From 2005 onwards the STW was litigated in administrative + state + federal courts across the United States, against a backdrop of non-stop media coverage of the events surrounding the illegal suspension/revocation of Kaul's license in 2012/2014. The administrative legal proceedings that resulted in the revocation of Kaul's license were a massive fraud, that the State of New Jersey in conspiracy with the K1/K2 defendants, polluted with hundreds of separate events of perjury + evidential omissions + misrepresentations + tampering + fraud, that Kaul has proved. Kaul argued in 2012 for the appointment of a special prosecutor and ad hoc medical board, as he knew the case against him had been corrupted by the K1/K2 defendants, and that he would not receive substantive justice in New Jersey (Exhibit 1). On March 12, 2014 K2 defendant NJBME revoked Kaul's license, based on the fraudulent opinion of K2 defendant/administrative law judge, Jay Howard Solomon. On January 17, 2018 (MLK birthday) Kaul filed 'The Solomon Critique' a document that proves that in the administrative proceeding (April 9, 2013 to June 28, 2013), K1/K2 defendants Przybylski + Kaufman + Solomon collectively committed two hundred and seventy-eight (278) separate instances of perjury + evidential omissions + misrepresentations + gross mischaracterizations. On February 11, 2019, Kaul submitted a motion for summary judgment against Defendant

Allstate New Jersey Insurance Company, that over two trillion dollars in damages. On February 25, 2019 Judge McNulty entered an order that dismissed with prejudice Kaul's federal-law claims, and shortly thereafter, Kaul submitted a document entitled 'The McNulty Analysis', that shows the factual and legal inconsistencies Judge McNulty's opinion, in the context of his familial relationship with Defendant Senator Schumer, and that of his status as a commercial beneficiary of Defendant Gibbons PC, a law firm at which Judge McNulty had been the director since at least 2008.

12. This case makes the assertion/allegation/argument that the K1/K2 defendants bribed Defendant Schumer to use his influence with his brother-in-law, Judge McNulty, in order to obstruct Kaul's prosecution of the case and pervert the course of justice, with the intention of preventing Kaul from presenting to the public the evidence of the K1/K2 defendants' crimes.

13. The K1/K2/K3 defendants embarked on an ill-intended and ill-conceived illegal scheme in approximately 2006, that will result in their economic + professional + reputational obliteration, and for some will lead to periods of incarceration. The defendants had many opportunities to rectify their wrongdoing, but they chose the true path of the criminal, and continued their cover-up, in the hope that a US Senator and a United States District Judge would salvage their 'Titanic' from 'The Man of Steel', as Kaul was once described by a United States Magistrate Judge. One of the ironies, in all of this, is that on March 28, 2013, as Kaul's lawyer, Robert Levy, was substituting out of the administrative case, he stated to Kaul's incoming lawyer, Charles Shaw:

**"Good luck, this is a sinking ship"**

14. Little did Levy know, that K2 defendants, Solomon + Hafner would end-up at the bow of that ship.

#### IV. STATEMENT OF FACT

15. The facts underpinning the four (4) themes (Professional Jealousy + Political Corruption + Fraud + Obstruction of Justice) of this case have been detailed in K1, and can be found within the following submitted documents:

- a. 'The Solomon Critique': D.E. 225 Page ID 5271 to 5270
- b. Motion for Summary Judgment v. Allstate New Jersey Insurance Company: D.E. 299 Page ID 7017 to 8170.
- c. Opinion of Judge McNulty: D.E. 300 Page ID 8171 to 8217
- d. 'The McNulty Analysis': D.E. 313 Page ID 8381 to 8448.

## V. CLAIMS FOR RELIEF

### COUNT ONE

**VIOLATIONS OF 18 U.S.C. COUNT ONE – VIOLATIONS OF 18 U.S.C. § 1962(C) - (D)  
THE RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT, 18 U.S.C. §1961,  
ET SEQ (Against all Defendants)**

16. Plaintiff incorporates by reference each preceding paragraph as thought fully set forth herein.

17. Plaintiff brings this Count against Defendants Schumer + Allstate + Geico + TD + Gibbons + Gannett (inclusively, for the purpose of this count, the "SCHUMER RICO Defendants"). At all relevant times, in a period from in or around July 2016 to the present, each of the SCHUMER RICO Defendants has been a "person" pursuant to 18 U.S.C. § 1961(3), because each is capable of holding and does hold, "a legal or beneficiary interest in property." Section 1962© makes it "unlawful for any person employed by unlawful for any person employed by or associated with any enterprise engaged in, or the activities of which affect, interstate or foreign commerce, to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity." See 18 U.S.C. § 1962(c).

18. Section 1962(d) makes it unlawful for "any person to conspire to violate" Section 1962(c), among other provisions. See 18 U.S.C. § 1962(d).

19. As explained in detail below, the SCHUMER RICO Defendants obstructed the process of justice in the matter of K1, in order to pervert the course of justice and cause Judge Kevin McNulty of the United States District Court for the District of New Jersey, to deny Kaul his constitutionally protected right to due process, deny him discovery, deny all of his motions and violate his civil rights, by denying him access to the procedure and substance of justice.

20. The purpose of the SCHUMER RICO Defendants fraudulent scheme was to cause Kaul to cease his prosecution of K1, in order to cause a concealment of their criminal conduct, as is alleged in K1. The purpose of this concealment was to negate the incurrence of the economic and reputational damages, that would have ensued from Kaul's public prosecution of the case.

#### A. Description of the SCHUMER RICO Enterprise

21. RICO defines an enterprise as "any individual, partnership, corporation, association, or

other legal entity, and any union or group of individuals associated-in-fact although not a legal entity." 18 U.S.C. § 1961 (4). An association-in-fact enterprise requires three structural features: (1) a purpose; (2) relationship among those associated with the enterprise; and (3) longevity sufficient to permit those associates to pursue the enterprise's purpose.

22. The "purpose" of the SCHUMER RICO Enterprise is stated in ---.

23. The "relationships" between the SCHUMER RICO Defendants, in the context of the SCHUMER RICO Association-In-Fact Enterprise are detailed below in ¶¶ to ¶¶.

24. Defendant Allstate commenced its scheme of bribing Defendant Schumer in approximately 1998, in a series of quid pro quo schemes, the purpose of which was to facilitate the entry of legislation advantageous to its commercial agenda, that permitted it to arbitrarily raise its auto insurance premiums. These bribes have been disguised as 'political campaign' donations, and include monies deposited in off-shore banking accounts and trusts. Defendant Allstate has, for at least the last twenty-two (22) years, employed this particular strategy in bribing state/federal legislators/politicians/judges. This pattern continues to this day and is an "open-ended" pattern of racketeering continuity, that poses an ongoing threat.

25. Defendant Geico has the same relationship with Defendant Schumer, as does Defendant Allstate. Defendant Geico, like Defendant Allstate, profits from the sale of auto insurance policies in, amongst others, the states of New Jersey and New York. Both defendants Geico and Allstate are companies publicly traded on the New York Stock Exchange, share identical economic goals and strategies of commerce, an element of which includes the bribing of state/federal politicians/legislators/judges, in furtherance of their economic agendas. Defendant Schumer's political career has been built primarily on monies (bribes) derived from NYSE traded companies, that include defendants Allstate + Geico + TD + Gannett.

26. Defendants Allstate + Geico + TD have, since at least 2006, engaged in commerce with Defendants Gannet + Gibbons, in the procurement of advertising and media coverage, advantageous to their commercial agendas. The quid pro quo in these commercial arrangements involves the funneling of monies from defendants Allstate + Geico + TD to defendants Gannet and Gibbons, in return respectively for favorable media coverage, and the effective 'purchasing' of Judge Kevin McNulty, made possible by his remaining a commercial beneficiary of Defendant Gibbons, subsequent to his appointment to the federal bench in 2012.

27. Judge McNulty is the brother-in-law of Defendant Schumer.

28. Defendant Schumer has received monies (bribes) disguised as 'political campaign donations' from Defendant Gibbons, a law firm of which Judge McNulty was the director in a period from approximately 2006 to 2012.

29. Defendant Schumer, although the US Senator for New York, used his political influence with now deceased US Senator for New Jersey, Frank Lautenberg, to have Judge McNulty appointed to the federal bench in 2012.

30. Defendant TD has the same relationship with Defendant Schumer as do defendants Geico + Allstate.

31. All of the defendants were and continue to be engaged in commerce, and became an association-in-fact enterprise pursuant to RICO, in or around mid 2016, the purpose of which was to obstruct justice in K1, and pervert the course of justice in order that Kaul cease his prosecution of the case.

32. The defendants relationships commenced in at least 1998 and constitute an "open-ended" pattern of racketeering continuity, a consequence of which has been to obstruct Kaul's prosecution of K1. This "pattern of racketeering" has involved the flow of bribes from defendants Allstate + Geico + TD + Gannet through defendants Gibbons + Schumer, with whom Judge McNulty remains in-privity. This has been the typical pattern of public corruption, employed by the defendants, one that has involved the conversion of law firms, courts and the body politic into racketeering enterprises, through which quid pro quo schemes are orchestrated between public servants and private entities. These schemes are ongoing and possess the requisite longevity, pursuant to RICO, to achieve the purposes of the enterprise i.e. deny Kaul access to justice in order to provide 'cover' for the defendants' crimes as alleged in K1 + K2.

33. The defendants, in furtherance of their racketeering scheme, engaged in communications that commenced in or around mid 2016, and involved face to face meetings, e-mails and texts, the substance of which pertained to the scheme to obstruct Kaul's access to justice, by using the SCHUMER RICO Enterprise to influence Judge McNulty to pervert the course of justice, prevent Kaul from obtaining discovery, and then to dismiss the case with prejudice, when Kaul moved for summary judgment against Defendant Allstate New Jersey Insurance Company.

34. At all relevant times, in the period that commenced in or around mid 2016, the SCHUMER RICO Defendants operated an ongoing association-in-fact enterprise, manufactured



for the purpose of obstructing Kaul's prosecution of K1, and perverting the course of justice, while committing the crime of Honest Service Fraud, through bribery, kickbacks and self-dealing. The nexus that permitted the flow of bribes and the perpetration of the quid pro quo schemes from and between defendants Gannet + Allstate + Geico + TD and defendants Schumer + Gibbons, was hinged on the law firm of defendant Gibbons and the political and personal accounts/trusts of Defendant Schumer.

35. The defendants perpetrated these schemes with in-person meetings that commenced in or around mid 2016, in closed door settings in New York, New Jersey and Washington, D.C., and in doing so conducted a pattern of racketeering under § 18 U.S.C. 1961(4).

36. The defendants, in the knowledge that their activities constituted violations of RICO, configured the SCHUMER RICO association-in-fact enterprise in such a way as to provide 'cover' for their illicit scheme, and used their separate legal statuses to internally organize the SCHUMER RICO association-in-fact enterprise, to mitigate the vicarious liability of RICO. The defendants conspired in the construction of this fraudulent racketeering construct, because they believed their distinct legal statuses would hinder detection, and make opaque the true internal architecture of their criminal syndicate.

37. At all times from approximately 2016, the SCHUMER RICO Enterprise constituted a single "enterprise" or multiple enterprises within the meaning of 18 U.S.C. § 1961(4), as legal entities, as well as individuals and legal entities associated-in-fact for the common purpose of engaging in the SCHUMER RICO Defendants fraudulent scheme to obstruct Kaul's prosecution of K1.

38. The SCHUMER RICO association-in-fact Enterprise consisted of the following entities and individuals: (a) Defendant Schumer; (b) Defendant Allstate; (c) Defendant Geico; (d) Defendant TD; (e) Gibbons; (f) Gannett.

39. While each of the SCHUMER RICO Defendants acquired, maintained control of, were associated with, and conducted or participated in the conduct of the SCHUMER RICO Enterprise's affairs, at all relevant times, the CAC RICO Enterprise: (a) had an existence separate and distinct from each CAC RICO Defendant; (b) was separate and distinct from the pattern of racketeering in which the CAC RICO Defendants engaged; and (c) was an ongoing and continuing organization consisting of legal entities, including the CAC RICO Defendants, along with other individuals and entities, including unknown third parties.

40. The SCHUMER RICO Defendants and their co-conspirators, through their illegal

SCHUMER RICO Enterprise, engaged in a pattern of racketeering activity, which involved a fraudulent scheme to obstruct Kaul's prosecution of K1 and pervert the course of justice, the purpose and result of which was respectively protection from economic obliteration and economic enrichment.

41. Defendant Schumer orchestrated the SCHUMER RICO Scheme, whereby he leveraged his familial relationship with Judge Kevin McNulty to obstruct Kaul's prosecution of the case, cause the illegal dismissal of K1, and prevent the public exposure of the judicial/political corruption in the case. Defendant Schumer was motivated to engage in this scheme because of money, as was Judge McNulty, who facilitated the scheme with a chilling indifference to the interests of justice.

42. The SCHUMER RICO Enterprise facilitated its fraudulent scheme of obstruction of justice + mail fraud + wire fraud + bribery + honest services fraud through a federal court, federal personnel and through entities connected to the political office of Defendant Schumer. The overarching purpose of the SCHUMER RICO Enterprise was to obstruct Kaul's prosecution of the case, pervert the course of justice and cause Judge Kevin McNulty to illegally dismiss the case, this being the 'quid' and the bribes being the 'pro'. These events commenced in mid 2016 and continued to the dismissal of the case in February, 2019. Defendants Allstate + Geico + TD + Gannett periodically funneled bribes into the campaign coffers of defendant Schumer, the accounts of Defendant Gibbons (bribes disguised as 'legal fees'), and made the payments in instalments to ensure Judge McNulty continued his obstruction of Kaul's case to dismissal.

**B. The SCHUMER RICO Association-In-Fact Enterprise engaged in an "open-ended" continuity "pattern of racketeering" in which they converted a federal court and political party into a RICO enterprise, the sole purpose of which was to obstruct justice, through the commission of bribery + mail fraud + wire fraud.**

43. All of the defendants became commercially enriched from their involvement in the SCHUMER RICO Enterprise and its fraudulent scheme of bribery + mail fraud + wire fraud + obstruction of justice. The illegal dismissal of Kaul's case was a "racketeering injury" that was a consequence of the defendants covert conversion of a federal court and political agency into an association-in-fact RICO enterprise. This enterprise provided legitimate 'cover' for the commission of multiple quid pro quo schemes, in which bribes were funneled from defendants Allstate + Geico + TD + Gannet to and through defendants Gibbons + Schumer.

44. At all times from approximately 2016, the SCHUMER RICO Association-In-Fact Enterprise: (a) had an existence separate and distinct from each SCHUMER RICO Defendant; (b)

was separate and distinct from the pattern of racketeering in which the SCHUMER RICO Defendants engaged; and (c) was an ongoing and continuing organization consisting of legal entities, including the SCHUMER RICO Defendants, along with other individuals and entities, including unknown third parties that operated an association-in-fact enterprise, which was formed for the purpose of obstructing Kaul's prosecution of the case, perverting the course of justice and causing the illegal dismissal of K1.

45. Defendants Allstate + Geico have a long and well-developed pattern of judicial/political corruption, that has been conducted through public relations firms, law firms and political lobbyists, with a 'revolving door' that connects the judiciary and body politic to these publicly held NYSE traded corporations.

46. The SCHUMER RICO Enterprise engaged in, and its activities affected, interstate and foreign commerce because it involved commercial activities across state boundaries. These activities included the sale of financial services + products + the trans-national commercialization of risk.

47. Within the SCHUMER RICO Enterprise, there existed a communication network, through which the defendants and co-conspirators disseminated information relevant to the perpetration of their fraudulent racketeering schemes, the purpose of which was to obstruct Kaul's prosecution of K1, pervert the course of justice and cause the illegal dismissal of K1. It was through this this network that the defendants coordinated their quid pro quo schemes.

48. Each defendant in the SCHUMER RICO Enterprise had systematic linkages to each other through familial ties, corporate ties, contractual relationships and a continuing coordination of activities. Through the SCHUMER RICO Association-In-Fact Enterprise, the SCHUMER RICO Defendants functioned as a continuing unit with the purpose of furthering the SCHUMER RICO Scheme. The SCHUMER RICO Defendants participated in the operation and management of the SCHUMER RICO Association-In-Fact Enterprise by directing its affairs, as described herein. While the SCHUMER RICO Defendants participated in, and are members of the enterprise, they have a separate existence from the enterprise, including distinct legal statuses, different offices and roles, bank accounts, officers, directors, employees, individual personhood, reporting requirements, and financial statements.

49. The SCHUMER RICO Defendants exerted substantial control over the SCHUMER RICO Enterprise, and participated in the affairs of the enterprise by: (a) deciding how and when bribes were dispersed; (b) communicating directly with lawyers, public relation agents and political lobbyists with direct connections to defendant Schumer and Judge McNulty; (c)

ensuring that the unnamed co-conspirators complied with and concealed the fraudulent scheme.

50. Without each SCHUMER RICO Defendants' willing participation, the SCHUMER RICO Scheme and common course of conduct would not have been successful. The SCHUMER RICO Defendants directed and controlled the ongoing enterprise necessary to implement the scheme. These meetings commenced in mid 2016 and continued into 2019 and consisted of discussions regarding the coordination of bribery with the progression of the case, to ensure that Judge McNulty continued to obstruct Kaul's prosecution of the case, quash subpoenas, deny discovery, deny Kaul's motions and pervert the course of justice to ensure Judge McNulty dismissed K1 with prejudice. A part of the defendants strategy was to encourage the Court provide Kaul with the charade of due process, in order to attempt to make the Court's dismissal appellate proof, in much the same deceptive manner that K2 defendants Hafner + Solomon conducted the charade of the administrative board proceedings that caused the illegal revocation of Kaul's license on March 12, 2014. Kaul has been subject to seven years of gross and criminally minded injustice in administrative + state + federal courts, within the geographic boundaries of New Jersey, which is one of the reasons why this case must and will be litigated in the SDNY.

**C Predicate Acts: Mail Fraud (Section 1341) + Wire Fraud (Section 1343) + Bribery (Section 201) + Obstruction of Justice (Section 1503)**

51. To carry out, or attempt to carry out, the scheme to defraud, the SCHUMER RICO Defendants, each of whom is a person associated-in-fact with the SCHUMER RICO Enterprise, did knowingly conduct or participate, directly or indirectly, in the affairs of the SCHUMER RICO Enterprise through a pattern of racketeering activity within the meaning of 18 U.S.C. §§ 1961(1), 1961(5) and 1962(c), employed the use of the mail and wire facilities, in violation of 18 U.S.C. § 1341 (mail fraud) and § 1343 (wire fraud), engaged in bribery in violation of 18 U.S.C. §201, and obstruction of justice in violation of 18 U.S.C. §§ 1501-1521. The SCHUMER RICO Defendants have committed, conspired to commit, and/or aided and abetted in the commission of at least two predicate acts of racketeering activity (i.e. violations of 18 U.S.C. §§ 1341 and 1343 + 18 U.S. C. §201 + 18 U.S.C. §§ 1501-1521) within the past ten years.

52. The multiple acts of racketeering activity which the SCHUMER RICO Defendants committed, or aided and abetted in the commission of, were related to each other, posed a threat of continued racketeering activity, and therefore constitute a "**pattern of racketeering activity.**" The racketeering activity was made possible by the

SCHUMER RICO Defendants' regular use of the facilities, services, distribution channels, and employees of the SCHUMER RICO Enterprise. The SCHUMER RICO Defendants participated in the scheme to obstruct Kaul's prosecution of K1 by using mail, telephone, and the Internet to transmit mailing and wires in interstate or foreign commerce.

53. The CAC RICO Defendants used, directed the use of, and/or caused to be used the mail and wire communications in furtherance of their illegal scheme to obstruct Kaul's prosecution of K1, by colluding with Judge McNulty to deny Kaul discovery, deny his motions, delay his case in order to permit defendants and third-party witness the opportunity to delete and or cause the spoliation of evidence.

54. In devising and executing the illegal scheme, the SCHUMER RICO Defendants concocted and knowingly carried out a material scheme and/or artifice that deprived the Plaintiff of his constitutionally protected right to substantive due process. For the purpose of executing the illegal scheme, the SCHUMER RICO Defendants committed these racketeering acts intentionally and knowingly with the specific intent to obstruct Kaul's prosecution of K1, deny him discovery, deny his motions and illegally dismiss K1, with the expectation that it would exhaust his resources, frustrate his will and cause him to "**pack his bags and leave**". They are wrong on all counts.

55. The CAC RICO Defendants' predicate acts of racketeering (18 U.S.C. § 1961(1)) include, but are not limited to:

(a) Mail Fraud: The SCHUMER RICO Defendants violated 18 U.S.C. § 1341 by sending or receiving, or by causing to be sent and/or received, materials via U.S. mail or commercial interstate carriers for the purpose of executing the unlawful scheme to revoke the Plaintiff's medical license by means of misrepresentations and omissions.

(b) Wire Fraud: The SCHUMER RICO Defendants violated 18 U.S.C. § 1343 by transmitting and/or receiving, or by causing to be transmitted and/or received, materials by wire for the purpose of executing the unlawful scheme to defraud and obtain money on false pretenses, misrepresentations, promises, and omissions.

(c) Bribery: The SCHUMER RICO Defendants violated 18 U.S.C. § 201 by bribing Defendant Schumer and causing him to violate sections (b)(2)(A)(B)(C), while themselves violating sections (b)(1)(A)(B)(C)

(d) Obstruction of Justice: The SCHUMER RICO Defendants violated 18 U.S.C. §§1501-1521 by conspiring and colluding with Defendant Schumer Judge

McNulty to obstruct Kaul's prosecution of K1, through the interference and influence of a pending federal judicial proceeding, of which the defendants had knowledge and of which they possessed a corrupt intent to interfere with or attempt to interfere with the proceeding. This evidence of this corrupt intent will be evident in the defendants digital and hand-written notes, those of third-party witnesses and the metadata of their digital profiles, the content of which can be reconstituted into arabaic format.

56. The SCHUMER RICO Defendants' use of the mails and wires include, but are not limited to: (a) the transmission of letters, e-mails and other materials purposed to obstruct Kaul's prosecution of K1; (b) the transmission of letters, emails and other materials indicating that the SCHUMER RICO Defendants had instructed their co-conspirators not to cease all communications with Kaul and not provide third-party affidavits; (c) written, telephone, or electronic communications regarding the bribery and obstruction of justice; (d) written, telephone, or electronic communications regarding discussions between the SCHUMER RICO Defendants and state and federal politicians about the scheme to have K1 dismissed and deny Kaul due process.

57. The SCHUMER RICO Defendants also communicated with each other, by U.S. mail, interstate facsimile, and interstate electronic mail in furtherance of their scheme to obstruct Kaul's prosecution of K1, and to cause its dismissal with prejudice on February 22, 2019. These communications occurred in a period that commenced in or around mid 2016, and were initiated by defendants Allstate + Geico, who through their political lobbyists + lawyers + public relation consultants contacted agents/representatives of Defendant Schumer. These initial communications were made in an 'arms-length' manner, but as the scheme progressed there did occur direct communications between the defendants. These direct communications occurred principally in the senate buildings in Washington, DC.

58. The SCHUMER RICO Defendants have not undertaken the practices described herein in isolation, but as part of a common scheme and conspiracy. In Violation of 18 U.S.C. § 1962(d), the SCHUMER RICO Defendants conspired to violate 18 U.S.C. § 1962(c), as described herein. Various other persons, firms, and corporations, including third-party entities and individuals not named as defendants in this Complaint, have participated as co-conspirators with the CAC RICO Defendants in these offenses. They have performed acts in furtherance of the defendants' illegal scheme to obstruct Kaul's prosecution of K1. The SCHUMER RICO Defendants aided and abetted others in violation of the above laws.

59. To achieve their common goals, the SCHUMER RICO Defendants encouraged Judge

McNulty to deny Kaul discovery and deny his motions, in order to obstruct his prosecution of the case, and cause it to be dismissed with prejudice on February 22, 2019.

60. The SCHUMER RICO Defendants and each member of the conspiracy, with knowledge and intent, agreed to the overall objective of the conspiracy to obstruct Kaul's prosecution of K1. The defendants agreed to conceal the details, and limit their discussions of the scheme to communications with each other, their lawyers + public relation consultants + political lobbyists. However, information pertaining to the scheme was brought to Kaul's attention by third-party witnesses who belong to the New Jersey political/medical/legal communities.

61. The SCHUMER RICO Defendants engaged in a pattern of related and continuous predicate acts against the Plaintiff for three years. The predicated acts constituted a variety of unlawful activities, each conducted with the common purpose of obstructing Kaul's prosecution of K1. The predicate acts were related and not isolated events.

62. During the SCHUMER RICO Defendants' perpetration of their scheme, Kaul had multiple communications with third-party witnesses in or around January 2019, in which he was provided with information as to the fact that the scheme was initiated by defendant Allstate + Geico, who through their lawyers + political lobbyists + public relation consultants presented defendant Schumer with the promise of bribes, disguised as 'political donations', and the transfer of monies into off-shore accounts/trusts and certain 'charitable foundations', including that of the Clinton Foundation.

63. By reason of, and as a result of the misconduct of the SCHUMER RICO Defendants, and in particular, their pattern of racketeering activity, Kaul's prosecution of K1 has been obstructed, he has been denied discovery, his motions have been denied, and his case was dismissed with prejudice on February 22, 2019.

64. The SCHUMER RICO Defendants' violations of 18 U.S.C. §1962(c) and (d) have directly and proximately caused injuries and damage to Kaul, who is entitled to bring this action for three times its actual damage, as well as injunctive/equitable relief, costs, and reasonable attorneys' fees pursuant to 18 U.S.C. § 1964(c)

**COUNT TWO**

**FOR DECLARATORY AND INJUNCTIVE RELIEF UNDER SECTIONS 16 OF THE CLAYTON ACT FOR DEFENDANTS' VIOLATION OF SECTIONS 1 AND 2 OF THE SHERMAN ACT (Against all Defendants)**

65. The events, facts and circumstances that caused Kaul to file K1, and as pled in K1, were also responsible for wide-ranging anti-trust effects on the minimally invasive spine surgery market in America, one consequence of which was an increase in the abuse of opiate based medications, due to an artificial reduction in the availability of minimally invasive spine surgery. Kaul asserts that the prosecution of K1 would have exposed these anti-trust violations, and the unconstitutional configuration of the mechanism of physician regulation, and would have resulted in fundamental regulatory changes, that would have benefitted the public. The defendants illegal scheme to obstruct Kaul's prosecution of K1, has deprived the public of these benefits, and has furthered the anti-trust injuries alleged in K1.

66. There is no evidence to prove that the current system of physician regulation in the United States of America protects the public, but there does exist evidence to prove that many state medical boards operate in violation of the due process clauses of the United States Constitution. The medical boards/tribunals operate without oversight, frequently merge the functions of judge + jury + prosecutor, and often initiate actions against physicians for reasons of politics + economics + professional jealousy, reasons that are concealed from the public.

67. The illegality of these state administered systems would have been publicly exposed had Kaul been permitted to prosecute K1, and the SCHUMER RICO Defendants' obstruction of the case has perpetuated the existence of these illegal schemes, and their anti-trust injuries on the healthcare of the American public.

68. The SCHUMER RICO Defendants anti-competitive scheme, rooted in its obstruction of justice, violates both the Sherman + Clayton Acts. The SCHUMER RICO Defendants knew that their illegal scheme would cause further anti-competitive injuries to the minimally invasive spine surgery market in the America, but acted with reckless disregard and or willful ignorance as to the injuries that their misconduct would cause to the public.

69. The SCHUMER RICO Defendants , as part of their monopolistic scheme, a scheme rooted in the obstruction of Kaul's prosecution of K1, conspired to maintain monopoly power for themselves and their K1 co-conspirators and bribers, with regards to the minimally invasive spine surgery market in the United States. This was in violation of Section 2 of the Sherman Act.



70. The SCHUMER RICO Defendants obstruction of Kaul's prosecution of K1, has facilitated and furthered a monopolization of the minimally invasive spine surgery in America by the K1 defendants, that would not have occurred absent their obstruction of justice. This has caused further anti-trust injury to Kaul and similarly trained minimally invasive spine surgeons in the United States, and has further deprived the public of the benefits of competition, in violation of Section 1 of the Sherman Act.

71. Kaul's reputation and economic standing were furthered injured by the defendants anti-trust violations, which have continued to deprive Kaul of his ability to practice minimally invasive spine surgery. Such an injury of "exclusion", one that would have been rectified, but for the defendants obstruction of Kaul's prosecution of K1, is the type antitrust laws were designed to prevent, and which is a direct consequence of the defendants unlawful obstruction of justice.

72. Kaul continues to suffer and will continue to suffer in the future from being excluded from the minimally invasive spine surgery market, more than he would have absent the defendants anti-competitive obstruction of justice. If Kaul has been permitted to prosecute K1, the progression of these anti-competitive injuries would have been partially mitigated.

73. Defendants' anti-competitive obstruction of justice, pursued in the context of bribery, kickbacks and fraud is not entitled to Noer-Pennington immunity.

74. Kaul, pursuant to Fed. R. Civ. P. 57 and U.S.C. § 2201(a) hereby seeks a declaratory judgment that Defendants' conduct in the obstruction of Kaul's prosecution of K1, has prevented Kaul's competition in the minimally invasive spine surgery market, in violation of Sections 1 and 2 of the Sherman Act

### **COUNT THREE**

#### **DEPRIVATION OF RIGHT UNDER COLOR OF LAW (Against all Defendants)**

75. Plaintiff hereby repeats and incorporates by reference each and every one of the foregoing paragraphs as though fully set forth.

76. The defendants acted under color of state law, in depriving Kaul of his civil rights and constitutionally protected right to due process pursuant to the Fifth + Eight +

Fourteenth Amendments of the United States Constitution.

77. From the commencement of the case on February 22, 2016, the defendants and or their counsel/agents became intertwined with the counsel/agents of defendants related to Defendant State of New Jersey. These entities included: (i) CHRISTOPHER J. CHRISTIE; (ii) THE STATE OF NEW JERSEY; (iii) JEFFREY CHIESA, ESQ; (iv) STEVEN LOMAZOW; (v) GREGORY PRZYBYLSKI, MD; (vi) NEW JERSEY BOARD OF MEDICAL EXAMINERS; (vii) WILLIAM ROEDER.

78. There existed a sufficiently close nexus between the state/state actors, and the defendants, in that the political and economic motives were almost identical. The defendants, in the knowledge that Kaul's prosecution of K1 would expose the crimes committed by the state during the administrative board proceedings (April 9, 2013 to June 28, 2013), acted to obstruct the prosecution, cause Kaul to be denied discovery and cause the Court to deny all of Kaul's motions.

79. The State created the legal framework from which defendants Allstate + Geico exercised the power of the State to have Kaul's license revoked, in order to negate their financial obligations to Kaul. All of the defendants, except Defendant Schumer, made 'political donations' to CHRISTOPHER J. CHRISTIE, in a period from 2009 to 2016.

80. Subsequent to the first case management conference in May 2016, the Court configured the case in order to procedurally align the interests of the state and non-state defendants, in the knowledge that the events + facts + circumstances that caused Kaul to file K1, evidenced that there already existed a merger of public and private function between the State and non-state defendants. Defendant Christie had converted the state into a racketeering enterprise, in which he sold state functions/authority/information to defendants Allstate + Geico + TD + Gibbons + Gannett, in return for bribes disguised as 'political campaign donations'.

81. These defendants adopted the mantle of state authority, that they used in K1 to perpetuate the deprivation of Kaul's right to due process, a deprivation that commenced on April 2, 2012, and first became evident on My 22, 2012, when the acting director of the division of consumer affairs, Eric Kanefsky illegally suspended Kaul's CDS prescribing privileges. This pattern of due process violation next became evident on June 13, 2012 when K2 defendant NJBME illegally suspended Kaul's license, quashed witness subpoenas for Kanefsky + Attorney General, Jeffrey Chiesa, and the president of K2 defendant NJBME, Paul Jordan, MD. This pattern has continued for seven (7) years in

administrative + state + federal courts within the geographic boundaries of New Jersey.

82. The defendants scheme to obstruct Kaul's prosecution of K1 has been made under the color of and in conspiracy with state actors, who were defendants in K1, but all of whom, however, were dismissed with prejudice on June 30, 2017 (D. E. 200) by Judge Kevin McNulty. This was a calculated tactic designed to dampen the political corruption thrust of K1. Defendant Schumer, as with K1 defendant Christie, has for many years used the power of his political office in furtherance of schemes that enriched himself, his family and friends.

83. The defendants scheme to deprive Kaul of his right to due process and obstruct his prosecution of K1 was and is an intentional and highly coordinated scheme, that involved collusion and conspiracy between state actors/agencies and the defendants. Defendant Gibbons receives legal work from the state, and a percentage of these profits are directed to Judge Kevin McNulty. This is an illegal arrangement that violates the doctrine that underpins the fundamental separation of powers, a doctrine on which this country was founded.

84. The defendants knew that their scheme to deprive Kaul of his right to due process was illegal, but calculated that Kaul would never be able to expose their scheme.

85. The defendants illegal scheme to obstruct Kaul's prosecution of K1 has perpetuated the economic and reputational damages that commenced on April 2, 2012 and has caused further damage to these attributes and to Kaul's professional standing. The economic damages are detailed in the Original Complaint (D.E. 1-2 Page ID 198 to 200).

86. The defendants, in obstructing Kaul's prosecution of K1 and depriving him of his constitutionally protected right to due process, have conspired with each other and with actors/agents of the State of New Jersey. These state actors are motivated to want to suppress K1, in the knowledge that it will expose the crimes committed against Kaul during the administrative board proceedings that resulted in the illegal revocation of Kaul's license (April 9, 2013 to June 28, 2013). The politico-legal nexus that exists between the state and the administrative + state + federal courts within the geographic boundaries of New Jersey, has been used by the defendants to obstruct Kaul's prosecution of K1.

87. Kaul filed K1 on February 22, 2016 in the United States District Court for the

Southern District of New York. On April 3, 2019, Kaul's efforts at obtaining discovery have continued to be denied. This lack of "substantive" justice is exactly what Kaul predicted would occur (Kaul v Christie: United States Court of Appeals for the Second Circuit – 16-1397 -CV D.E. 41 Page 1 to 170). This is illegal, and is partly a consequence of the defendants deprivation, under color of state law, of Kaul's right to due process, a deprivation that was implemented in furtherance of the conspiracy that officially commenced on April 2, 2012.

## VI. DEMAND FOR JUDGMENT

**WHEREFORE**, Plaintiff seeks judgment against the Defendants jointly and severally, as follows:

88. Compensatory damages from all defendants in their individual capacities.
89. Consequential damages from all defendants in their individual capacities.
90. Punitive damages from all defendants in their individual capacities.
91. Declaring that the defendants funneled bribes to Judge Kevin McNulty and Defendant Schumer through the law firm of Defendant Gibbons, and the political campaign funds of Defendant Schumer.
92. Declaring that the bribes were part of a quid pro quo scheme, the purpose of which was to obstruct Kaul's prosecution of K1.
93. Declaring that the conduct alleged herein is in violation of Sections 1 and 2 of the Sherman Act and of the other statutes set forth above.
94. Enjoining defendants from continuing the illegal activities alleged herein.
95. Granting Kaul equitable relief in the nature of disgorgement, restitution and the creation of a constructive trust to remedy defendants' unjust enrichment
96. Awarding Kaul treble, multiple, punitive and/or other damages in the amount

to be determined at trial or through settlement.

97. Awarding Kaul costs of suit, including reasonable attorneys' fees as provided by law.

98. Granting such other relief as is necessary to correct for the anti-competitive effects caused by the unlawful conduct of defendants, and as the Court deems just.

## **VII. JURY DEMAND**

Kaul demands trial by jury on all issues so triable

## **VIII. DEMAND FOR INSURANCE**

Demand is hereby made for all insurance policies, which may cover the damages alleged in this Complaint

## **Exhibit 1**

**Richard Kaul**

---

**From:** Robert Conroy [RConroy@drlaw.com]  
**Sent:** Tuesday, May 22, 2012 4:31 PM  
**To:** Richard Kaul  
**Subject:** FW: I/M/O Richard Kaul, M.D.

**From:** Robert Conroy  
**Sent:** Tuesday, May 22, 2012 3:40 PM  
**To:** 'Doreen Hafner' (Doreen.Hafner@dol.lps.state.nj.us)  
**Subject:** I/M/O Richard Kaul, M.D.

Please share this email with the powers that be.

I am not accusing you of bad faith but I believe that the Attorney General and the Acting Director of the Division of Consumer Affairs have not only acted in extreme bad faith in seeking to summarily suspend my client's CDS privileges but that have done so as part of a cheap piece of political theater and have made a mockery of my client's Due Process Rights. We believe their actions to have so prejudiced the administrative process that Dr. Kaul is unable to obtain a fair hearing. I have raised the improper merger of the investigatory, prosecutorial and adjudicatory functions in the Office of Attorney General before as a clearly unconstitutional practice. Apparently, this will give us the factual basis to establish once and for all that the Office of Attorney General cannot be trusted to conduct itself fairly and within the confines of the Constitution. Insofar as the Attorney General and the Acting Director of the Division of Consumer Affairs have made statements to the media that clearly reveal their personal animus toward my client and their pre-judgment of this matter, we call upon them to immediately recuse themselves from any and all future deliberations, etc., involving Dr. Kaul, and make themselves available to testify as required by a subpoena I will be issuing to compel their attendance at the hearing on this latest summary suspension. I must also warn them about engaging in any efforts to obstruct our client's attempt to receive a fair hearing or cover up their previous involvement. Lastly, we are presently considering federal action. Might I remind the powers that be that we have been successful in the past in obtaining a sizeable attorneys' fee award against the state in a Board matter; indeed, we are the only party in the history of our Republic to ever have the US Marshall seize a state's general revenue fund. Apparently, they want to afford us another opportunity to do so.

If cooler heads prevail, please have them contact me. Otherwise, I can assure them that this will ultimately not be judged their finest hour.

**Robert J. (Bob) Conroy**

Kern Augustine  
Conroy & Schoppmann, P.C.  
1120 Route 22 East  
Bridgewater, NJ 08807  
tel: 908-704-8585  
fax: 908-704-8899  
email: [conroy@drlaw.com](mailto:conroy@drlaw.com) or [roberticonroy@post.harvard.edu](mailto:roberticonroy@post.harvard.edu)  
Admitted to practice law in: New York, New Jersey, California, Florida, Pennsylvania and the District of Columbia

6/16/2012

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**RICHARD ARJUN KAUL,**

**Plaintiff,**

**v.**

**CHRISTOPER J. CHRISTIE, et al.,**

**Defendants.**

Civ. No. 16-2364 (KM) (SCM)

*Also file in*

Civ. No. 18-8086

Civ. No. 19-8946

Civ. No. 19-9232

**MEMORANDUM & ORDER  
(RECUSAL)**

In the first, above-captioned action, filed in 2016, Dr. Kaul alleges that there is a conspiracy at the highest levels of medicine, the legal profession, and politics that culminated in proceedings by which he lost his medical license based on spinal surgeries he was found unqualified to perform. I have filed opinions and orders granting motions to dismiss substantially all of the amended complaint and second amended complaint for failure to state a claim. (See DE 303 (amended version of DE 200); DE 300) Certain residual matters remain pending. (See list at DE 316.)

A second action, *Kaul v. Christie et al.*, Civ. No. 18-8086, is related to the first. The Magistrate Judge ordered that it be stayed pending the outcome of motions to dismiss in the first action.

A third action, *H. Patel and R.A. Kaul v. Crist et al.*, Civ. No. 19-8946, arrived in this district by transfer from the Northern District of Georgia, and was assigned to me. It is brought against the State of New Jersey, Allstate, and others, and is framed as a constitutional challenge to the New Jersey Insurance Fraud Prevention Act.

A fourth action, *H. Patel and R.A. Kaul v. Crist et al.*, Civ. No. 19-9232, likewise arrived in this district by transfer from the Northern District of Georgia, and was assigned to me. It is brought against the State of New Jersey,



Allstate, and others, and is framed as an action under 42 U.S.C. § 1983 based on racial or ethnic discrimination.

**I. First Recusal Submission (DE 313)**

On March 18, 2019, the plaintiff filed a submission consisting of a 3-page letter (DE 313) and a 65-page, single-spaced attachment entitled “The McNulty Analysis” (DE 313-1) Therein appears the following, later confirmed to be a motion for my recusal:

4. Conceal from Kaul the conflicts of interest that existed by virtue of the fact that: (i) Judge McNulty had represented two of the defendants when he was the director at Gibbons, PC law firm; (ii) Gibbons, PC law firm, with which Judge McNulty is a commercial beneficiary, represented defendants Washburn+ NJMG; (iii) Judge McNulty is the brother-in-law of US Senator Charles E. Schumer (D-NY), a senior American politician who has within the last three years received substantial monetary donation from the insurance industry, of which certain defendants are members; . . . .

(DE 313-1 p. 3, *see also* pp. 36, 40; DE 334.)

The timing of this call for recusal is highly suspect, coming after three years of litigation and very soon after my ruling dismissing substantially all of the Second Amended Complaint. Timing aside, these allegations would not constitute grounds for my recusal under 28 U.S.C. §§ 144 or 455, and they cast no doubt on prior rulings in the case. I review them very briefly.

1. **Rulings in the case.** I have no knowledge of Dr. Kaul other than what I have learned as a result of presiding over the case. Internal bias, *e.g.*, disagreement with rulings in the case, are rarely if ever grounds for recusal, and no signs of bias are present. *See generally Liteky v. United States*, 510 U.S. 540, 555, 114 S. Ct. 1147, 1157 (1994).
2. **Ex parte contacts.** I have had none. The allegation is based on my citation of statements in Dr. Kaul’s own complaint. (2019 MTD Op. at 12–13, citing 2AC ¶¶ 75, 76) Dr. Kaul states that I should have known

he had made a typographical error, and that therefore I must have gotten my information elsewhere. (Motion, DE 334 at 15 ¶ 34)

3. **Financial relationship with Gibbons, P.C.** The motion alleges that I have an ongoing financial relationship with or stake in Gibbons, P.C. I severed all ties with the firm when I was appointed to the bench in July 2012.
4. **Presence of Gibbons, P.C. in this action.** In this action, the Gibbons firm represents defendants North Jersey Media, Inc. and Lindsay Washburn. While at Gibbons, I had no involvement in any representation of those clients, assuming there was any such representation. I was appointed to the bench in July 2012 and declined assignment of cases involving the Gibbons firm for approximately three years. The earliest underlying event for which Dr. Kaul sues these clients (an allegedly defamatory article) occurred in November 2013, more than a year after I had left the firm. This action was filed in 2016, four years after I had left the firm.
5. **2002 Amicus brief.** In 2002, I filed an *amicus* brief in the New Jersey Supreme Court on behalf of University Physician Associates (“UPA”), an entity which performed services for the UMDNJ faculty practice plan. *Howard v. University of Medicine and Dentistry of New Jersey, et al.*, 172 N.J. 537, 800 A.2d 73 (2002). Dr. Heary, who is a defendant in this case, was sued in that earlier case for alleged medical malpractice committed in 1997. In the 2002 case I did not represent any person or entity that is now a party to this case. There is no relation between the subject matter of that earlier case and this one, filed fourteen years later.
6. **Insurance company campaign contributions.** Sen. Charles Schumer (D-NY) is the brother of my spouse. Dr. Kaul alleges that Sen. Schumer has “received large political donations from the insurance sector within the last three (3) years,” and that one such donor is Allstate, a defendant in this action. I was and am unfamiliar

with the identities of the Senator's corporate donors. At any rate, no substantial connection would be inferred from these attenuated claims; no actual facts suggesting a connection between such donations and this case are proffered.

## **II. Second Recusal Submission (SDNY Action)**

Thus far there are no substantial grounds for recusal. On May 8, 2019, however, Dr. Kaul filed a supplemental submission to which he attached a copy of a civil complaint, Civ. No. 19-3046, of which I had previously been unaware. Checking the docket, I see that it was filed on April 4, 2019, in the U.S. District Court for the Southern District of New York. Summonses have not yet issued and the complaint has not been served.

In that complaint, Dr. Kaul sues Sen. Schumer and certain of the defendants in this action: two insurance companies (Allstate and Geico), TD Bank, the Gibbons firm, and Gannett Co. Inc. (the entity that purchased North Jersey Media, Inc.). My name figures in the allegations, although I am not named as a party.

As of April 4, 2019, then, Dr. Kaul has sued a relative, and named me, in a civil complaint. That circumstance casts no doubt on prior rulings, but does counsel caution going forward. I do not of course accept the truth or the conspiratorial logic of those allegations. Nevertheless, to maintain public confidence and avoid even an appearance of impropriety, I will request that the remainder of this case be reassigned to another district judge. That request will extend to the other three cases cited above (p.1, *supra*), all of which involve Dr. Kaul.

**ORDER**

**IT IS THEREFORE** this 22d day of May, 2019,

**ORDERED** that I am **prospectively** recused from presiding over future proceedings in the following cases, except for such non-substantive rulings as may be required in connection with the transfer:

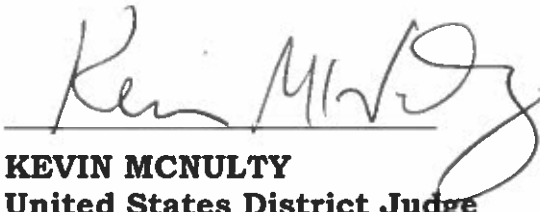
*Kaul v. Christie et al.*, Civ. No. 16-2364

*Kaul v. Christie et al.*, Civ. No. 18-8086

*Patel and Kaul v. Crist et al.*, Civ. No. 19-8946

*Patel and Kaul v. Crist et al.*, Civ. No. 19-9232

It is requested that the Chief Judge direct the Clerk to randomly assign those cases to a new district judge for all further proceedings.

  
A handwritten signature in black ink, appearing to read "Kevin McNulty", is written over a horizontal line. The signature is cursive and extends to the right of the line.

**KEVIN MCNULTY**  
**United States District Judge**

U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
RECEIVED

[www.drrichardkaul.com](http://www.drrichardkaul.com)

2019 JUN 28 P 2: 22

June 27, 2019

The Honorable Chief Judge Freda Wolfson  
United States District Court  
District of New Jersey  
50 Walnut Street # 4015  
Newark, NJ 07102

*Please file in:  
K1- Kaul v Christie: 16-CV-02364*

**Re: K1 - Kaul v Christie: 16-CV-02364**

**K2 – Kaul v Christie: 18-CV-08086**

**P1 – Patel v Crist: 19-CV-08946**

**P2 – Patel v Allstate: 19-CV-09232**

**Submission to the dockets of form AO10 by judges in the United States District Court for the District of New Jersey.**

Dear Judge Wolfson,

I write this letter, lieu of a more formal brief, to request that you order Judges Linares and McNulty to immediately submit onto the court docket their AO 10A financial disclosure/conflict forms. It is my position that these jurists were bribed by the defendants in the above matters, as part of a series of quid pro quo schemes, in which Judges Linares and McNulty abused the authority of the United States District Court to obstruct my prosecution of the aforesaid cases.

On May 16, 2019, a letter addressed to ex-Chief Judge Linares, was filed onto the P1 court docket (P1-D.E. 44 Page 851 – copy enclosed), in which I and Plaintiff Patel requested Judge Linares disclose his financial holdings:

**“We also request, with all due respect, that in light of your involvement in the cases, you disclose to us, the record and the Court, your financial disclosure statement and a complete and comprehensive list of any and all conflicts of interest, past or present, that involve you and any members of your family, to the third-degree.”**

Judge Linares failed to provide this information, but instead suddenly retired from the bench (P1-D.E. 52 Page 960 – copy enclosed):

**“We requested that the information be provided by May 22, 2019, but Chief Judge Linares retired on May 16, 2019, after only two years in this position, and needless to say, he failed to submit the conflict and financial disclosure information.”**

On June 5, 2019 (K1-D.E. 366) the Court appointed Judge Brian Martinotti to the above cases. Judge Martinotti has not yet submitted his financial holdings and any conflicts of interest, and I would request that you order the immediate disclosure of this information.

I would like to re-iterate my position that **“Judges McNulty and Linares have engaged in prolonged patterns of judicial corruption, in which they used the power of the federal bench to improperly and illegally advance their personal commercial agendas ... It is also our position that Judge McNulty ought to be impeached and Judge Linares be subject to criminal investigation...”** (P1-D.E. 52 – copy enclosed).

In furtherance of my frequently repeated claim that I would not receive **“substantive justice”** (United States Court of Appeals for the 2<sup>nd</sup> Circuit: Case No. 16-1397 Page 4 of 170) in any court within the geographic boundaries of the State of New Jersey, I respectfully request that you order every judge in this court to disclose to the record his or her financial holdings and any conflicts of interest.

I respectfully inform the Court that if the above requested information is not provided by 5 pm EST on Monday July 1, 2019, I will move in the United States Court of Appeals for the Third Circuit for a writ of mandamus, a copy of which will be filed with the United States Supreme Court. I shall also bring this issue to the attention of the President of the United States of America.

A dishonest judiciary is inimical to the good order of society and I imagine its prevalence in the District of New Jersey, would be a political embarrassment to the presidential aspirations of the U.S. Senator from New Jersey, Cory Booker. I believe he and Senator Menendez sponsored the appointment of Judge Martinotti to the federal bench.

I look forward to receiving the above requested information, and I thank you in advance for your prompt attention to these very serious matters.

Yours sincerely

*R.Kaul*

Richard Arjun Kaul, MD  
cc: All Counsel via e-mail  
Clerk of the Court  
Judge Brian Martinotti

U.S. District Court  
District of New Jersey  
May 9, 2019  
2019 MAY 10 P 4: 20

DR. HARSHAD PATEL  
3725 GEORGE BUSBEE PARKWAY  
UNIT #1102  
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732 319 3055  
[Harshadpatel0111@gmail.com](mailto:Harshadpatel0111@gmail.com)

RICHARD ARJUN KAUL, MD  
440c SOMERSET DRIVE  
PEARL RIVER, NY 10965  
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[drrichardkaul@gmail.com](mailto:drrichardkaul@gmail.com)

The Honorable Jose L. Linares  
Chief Judge  
United States District Court  
District of New Jersey  
50 walnut Street #4015  
Newark, NJ 07102

**Re: Patel v Crist, et al**  
**Docket No. 19-CV-08946 – P1**  
**Patel v Allstate, et al**  
**Docket No. 19-CV-09232 – P1**

For reference purposes:  
Kaul v Christie: 16-CV-02364 – K1  
Kaul v Christie: 18-CV-08086 – K2  
Kaul v Schumer: 19-CV-3046 – K3

Dear Judge Linares,

We write this letter to bring to the Court’s attention, that on May 8, 2019, a motion for the judicial disqualification of Judge Kevin McNulty was filed in K1 + K2, and that this therefore precludes Judge Kevin McNulty from any further involvement in the case, be it administrative, ministerial, or judicial.

It is also our position, as is similarly stated in ‘The McNulty Disqualification’, that Judge McNulty is conflicted, as he and his law firm, K3 defendant, Gibbons, PC, remain commercial beneficiaries of the defendants. We believe that this conflict is evidenced by the fact that the cases, after having been transferred on March 25, 2019 to the United States District Court for

- Case 2:19-cv-08946-KM-SCM Document 44 Filed 05/16/19 Page 2 of 3 PageID: 851

the District of New Jersey (D.E. 22), and assigned to Judge Freda Wolfson, were then, on March 27, 2019, transferred to Judge Kevin McNulty. The Court provided no reason to justify this transfer, and we respectfully assert that the purpose is exactly that detailed in 'The McNulty Disqualification' i.e. judicial corruption + bribery.

Judge McNulty, since having the cases come under his remit, has not, as the law requires, disclosed to either us, the record or the Court his financial disclosure statement, or indeed his conflicts of interest, past or present. We consider this to be evidence that he is in fact conflicted, and is thus prohibited from any further involvement in the cases.

We also request, with all due respect, that in light of your involvement in the cases, you disclose to us, the record and the Court, your financial disclosure statement and a complete and comprehensive list of any and all conflicts of interest, past or present, that involve you and or any members of your family, to the third-degree. We believe it to be a conflict of interest that your son, Jose L. Linares, is employed by the law firm of Walsh + Pizzi + O'Really + Falanga, a law firm whose principal is married to the Clerk of the Court, William Walsh, and one that represents defendant Hackensack University Medical Center and Robert Garrett in K1 + K2.

We respectfully request that the aforementioned information be provided by May 22, 2019 by the close of business in your court.

In full recognition of your esteemed position within the judicial body of the United States of America, and of your purpose to do justice, we assert that because of the "politico-legal" nexus that undeniably connects the federal judiciary with the body politic, it would not serve the interests of justice to have any of the above cases litigated in any court, within the geographic boundaries of New Jersey. At the heart of these matters are located state actors, state agencies and the state itself, the interests of which are interminably intertwined with the interests of New Jersey lawyers + state judges + New Jersey based federal judges. Simply, as a point of historical interest, the untenability of such a situation was recognized in Spain, after the fall of Franco, when members of the Guardia Civil and Spanish federal judiciary were assigned to provinces in which they had no connections with the local community. This remains the case today, and for good reason, and it was because of this political impartiality that it was a Spanish Judge, Baltasar Garzon, who had General Augusto Pinochet arrested, in 1998, in London for his crimes against humanity. This is the standard to which all jurisprudence should compare itself.

With regards to crimes against humanity, K2 defendant, Christopher J. Christie is no stranger (D.E. 296-11 Page 6973).

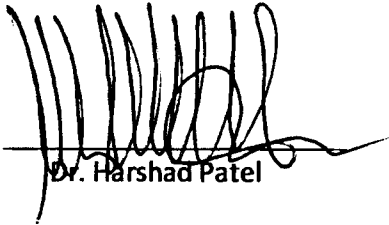
It is thus therefore, proper and consistent with the interests justice to have the above cases adjudicated in district courts not within the geographic boundaries of New Jersey, and we would respectfully request that you transfer P1 + P2 back to the United States District for the Northern District of Georgia, no later than May 22, 2019.

We thank you for your attention to this matter.



- Case 2:19-cv-08946-KM-SCM Document 44 Filed 05/16/19 Page 3 of 3 PageID: 852

Yours sincerely



Dr. Harshad Patel

cc: All Counsel of record  
Clerk of the Court

*R. Kaul*

---

Richard Arjun Kaul, MD

DR. HARSHAD PATEL  
3725 GEORGE BUSBEE PARKWAY  
UNIT #1102  
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732 319 3055  
Harshadpatel0111@gmail.com

U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
RECEIVED  
2019 JUN -3 P 2:47

06-03-2019  
RICHARD ARJUN KAUL, MD  
440c SOMERSET DRIVE  
PEARL RIVER, NY 10965  
201 989 2299  
drrichardkaul@gmail.com

The Honorable Chief Judge Freda Wolfson  
United States District Court  
District of New Jersey  
50 Walnut Street #4015  
Newark, NJ 07102

**Re: Patel v Crist, et al**  
**Docket No. 19-CV-08946 – P1**  
**Patel v Allstate, et al**  
**Docket No. 19-CV-09232 – P1**

For reference purposes:  
Kaul v Christie: 16-CV-02364 – K1  
Kaul v Christie: 18-CV-08086 – K2  
Kaul v Schumer: 19-CV-3046 – K3

Dear Judge Wolfson,

On May 9, 2019 we sent a letter (<sup>Ex-1</sup>copy enclosed) to recently retired Chief Judge, Jose Linares, in which we requested that he provide to us, the record and the Court, a copy of his AO10 financial disclosure form, and a **“complete and comprehensive list of any and all conflicts of interest, past or present”** that involved either Judge Linares or any members of his family to a third degree. This letter was filed in the late drop box by Dr. Patel on May 10, 2019, but has still not appeared on the docket. We requested that the information be provided by May 22, 2019, but Chief Judge Linares retired on May 16, 2019, after only two years in this position, and needless to say, he failed to submit the conflict and financial disclosure information.

In this letter we also raised the issue that Judge McNulty, since taking assignment of K1 on April 19, 2016, had failed to disclose his conflicts of interest and financial holdings, and in the context

of the facts that underpin the disqualification of Judge McNulty, we interpret these omissions as evidence of his conflicted state.

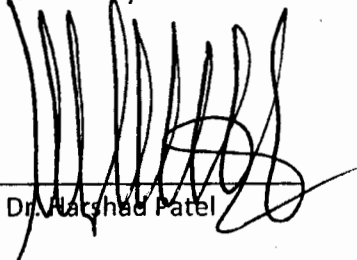
On May 2, 2019 I electronically submitted a REQUEST FOR EXAMINATION OF REPORT FILED BY A JUDICIAL OFFICER OR JUDICIAL EMPLOYEE (~~copy enclosed~~), pertaining to Judge McNulty and ex-Chief Judge Linares. *EX-2*

It is our position that Judges McNulty and Linares have engaged in prolonged patterns of judicial corruption, in which they used the power of the federal bench to improperly and illegally advance their personal commercial agendas. We suspect that this misconduct has been in existence for many years, and has involved many cases, and likely led to many injustices, in both civil and criminal cases. It is also our position that Judge McNulty ought to be impeached, and Judge Linares be subject to an independent criminal investigation, and we will ensure that these events come to pass. No one is above the law, particularly those to whom it is entrusted by society.

We would therefore respectfully request that by June 22, 2019, we be provided with a complete and comprehensive list of all of Judge McNulty and Linares' conflicts of interest and financial holdings, dating back to 2003 for Judge Linares and 2012 for Judge McNulty. We also respectfully request that we be provided with a complete list of all cases over which Judges McNulty and Linares have presided, for the same respective time periods.

We thank you for your consideration.

Yours sincerely

  
Dr. Marshad Patel

*R. Kaul*  
Richard Arjun Kaul, MD

cc: All Counsel of record  
Clerk of the Court  
Judge Steven C. Mannion

## **Exhibit 1**

May 9, 2019

DR. HARSHAD PATEL  
3725 GEORGE BUSBEE PARKWAY  
UNIT #1102  
KENNESAW, GA 30144  
732 319 3055  
[Harshadpatel0111@gmail.com](mailto:Harshadpatel0111@gmail.com)

U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
RECEIVED

2019 JUN -3 P 2:48

RICHARD ARJUN KAUL, MD  
440c SOMERSET DRIVE  
PEARL RIVER, NY 10965  
201 989 2299  
[drrichardkaul@gmail.com](mailto:drrichardkaul@gmail.com)

The Honorable Jose L. Linares  
Chief Judge  
United States District Court  
District of New Jersey  
50 walnut Street #4015  
Newark, NJ 07102

**Re: Patel v Crist, et al**  
**Docket No. 19-CV-08946 – P1**  
**Patel v Allstate, et al**  
**Docket No. 19-CV-09232 – P1**

For reference purposes:  
Kaul v Christie: 16-CV-02364 – K1  
Kaul v Christie: 18-CV-08086 – K2  
Kaul v Schumer: 19-CV-3046 – K3

Dear Judge Linares,

We write this letter to bring to the Court's attention, that on May 8, 2019, a motion for the judicial disqualification of Judge Kevin McNulty was filed in K1 + K2, and that this therefore precludes Judge Kevin McNulty from any further involvement in the case, be it administrative, ministerial, or judicial.

It is also our position, as is similarly stated in 'The McNulty Disqualification', that Judge McNulty is conflicted, as he and his law firm, K3 defendant, Gibbons, PC, remain commercial beneficiaries of the defendants. We believe that this conflict is evidenced by the fact that the cases, after having been transferred on March 25, 2019 to the United States District Court for

the District of New Jersey (D.E. 22), and assigned to Judge Freda Wolfson, were then, on March 27, 2019, transferred to Judge Kevin McNulty. The Court provided no reason to justify this transfer, and we respectfully assert that the purpose is exactly that detailed in 'The McNulty Disqualification' i.e. judicial corruption + bribery.

Judge McNulty, since having the cases come under his remit, has not, as the law requires, disclosed to either us, the record or the Court his financial disclosure statement, or indeed his conflicts of interest, past or present. We consider this to be evidence that he is in fact conflicted, and is thus prohibited from any further involvement in the cases.

We also request, with all due respect, that in light of your involvement in the cases, you disclose to us, the record and the Court, your financial disclosure statement and a complete and comprehensive list of any and all conflicts of interest, past or present, that involve you and or any members of your family, to the third-degree. We believe it to be a conflict of interest that your son, Jose L. Linares, is employed by the law firm of Walsh + Pizzi + O'Really + Falanga, a law firm whose principal is married to the Clerk of the Court, William Walsh, and one that represents defendant Hackensack University Medical Center and Robert Garrett in K1 + K2.

We respectfully request that the aforementioned information be provided by May 22, 2019 by the close of business in your court.

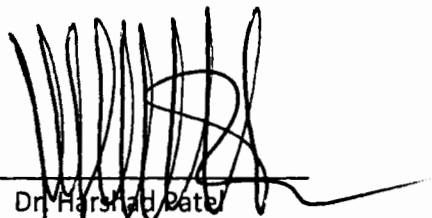
In full recognition of your esteemed position within the judicial body of the United States of America, and of your purpose to do justice, we assert that because of the "**politico-legal**" nexus that undeniably connects the federal judiciary with the body politic, it would not serve the interests of justice to have any of the above cases litigated in any court, within the geographic boundaries of New Jersey. At the heart of these matters are located state actors, state agencies and the state itself, the interests of which are interminably intertwined with the interests of New Jersey lawyers + state judges + New Jersey based federal judges. Simply, as a point of historical interest, the untenability of such a situation was recognized in Spain, after the fall of Franco, when members of the Guardia Civil and Spanish federal judiciary were assigned to provinces in which they had no connections with the local community. This remains the case today, and for good reason, and it was because of this political impartiality that it was a Spanish Judge, Baltasar Garzon, who had General Augusto Pinochet arrested, in 1998, in London for his crimes against humanity. This is the standard to which all jurisprudence should compare itself.

With regards to crimes against humanity, K2 defendant, Christopher J. Christie is no stranger (D.E. 296-11 Page 6973).

It is thus therefore, proper and consistent with the interests justice to have the above cases adjudicated in district courts not within the geographic boundaries of New Jersey, and we would respectfully request that you transfer P1 + P2 back to the United States District for the Northern District of Georgia, no later than May 22, 2019.

We thank you for your attention to this matter.

Yours sincerely



Dr. Harshad Patel

cc: All Counsel of record  
Clerk of the Court

*R. Kaul*

---

Richard Arjun Kaul, MD

## **Exhibit 2**





Richard Kaul <rrichardkaul@gmail.com>

## Request for financial disclosure statements

Richard Kaul <rrichardkaul@gmail.com>  
To: CommitteeonFinancialDisclosure@ao.uscourts.gov

Thu, May 2, 2019 at 6:25 PM

Dear Sir/Madam,

Please find attached the following document:

1. Request for financial disclosure statements for:
  - a. Judge Kevin McNulty - United States District Judge for the District of New Jersey.
  - b. Chief Judge Jose Linares - United States Chief Judge for the District of New Jersey.

Thank you in advance

Regards,

Richard Arjun Kaul, MD

www.drrichardkaul.com

 190502-Request Financial Disclosure-McNulty + Linares.pdf  
569K

2019 JUN - 3 P 2:48  
U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
RECEIVED

AO 10A (Rev. 03/17)

### REQUEST FOR EXAMINATION OF REPORT FILED BY A JUDICIAL OFFICER OR JUDICIAL EMPLOYEE

In accordance with section 105 of the Ethics in Government Act of 1978, as amended, I request that the report of the following named Judicial Officers or Judicial Employees be sent to me in electronic form. By checking this box, I am requesting a paper copy rather than an electronic copy  (See instructions).

	NAME	POSITION	YEAR(S) REQUESTED	
NAMES OF INDIVIDUALS WHOSE DISCLOSURE REPORTS ARE REQUESTED	Kevin McNulty- District Judge	United States Court for the DNJ	2012-2019	
	Joseph Linares - Chief Judge	United States Court for the DNJ	2002-2019	


ORGANIZATIONS OR PERSONS ON WHOSE BEHALF THIS REQUEST IS MADE	NAME	ADDRESS
	Richard Arjun Kaul, MD	440c Somerset Drive, Pearl River, NY 10965

**PROHIBITIONS**

I understand that the statute makes it unlawful to obtain or use this or these reports for: any unlawful purpose; any commercial purpose other than by news and communication media for dissemination to the general public; determining or establishing of the credit rating of any individual; or use, directly or indirectly, in the solicitation of money for any political, charitable, or other purpose (5 U.S.C. App. 4 § 105(e)).

I understand that whoever, in any manner within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully (1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact; (2) makes any materially false, fictitious, or fraudulent statement or representation; or (3) makes or uses any false writing or document, knowing the same to contain any materially false, fictitious, or fraudulent statement or entry, shall be fined not more than \$10,000 or imprisoned not more than five years, or both (18 U.S.C. § 1001).

I am aware of the prohibitions on the obtaining and use of this information, as are stated above, and that this request for examination is a matter of public record.

<b>PERSON MAKING REQUEST</b>	Name: Richard Arjun Kaul, MD	Occupation: Currently unemployed
	Phone Number: 201 989 2299	Email Address: drrichardkaul@gmail.com
	Mailing Address: 440c Somerset Drive, Pearl River, NY 10965	
	I certify under penalty of perjury that the foregoing is true and correct (28 U.S.C. § 1746)	
	 Signature	May 2, 2019 Date executed

CLERK  
U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
RECEIVED

[www.drrichardkaul.com](http://www.drrichardkaul.com)

2019 JUL 31 P 3:06

August 1, 2019

The Honorable Brian R. Martinotti  
District Judge  
United States District Court  
District of New Jersey  
50 Walnut Street  
Newark, NJ 07102

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

**Request for admission or denial of statements pertaining to the transmission/exchange of information/monies between Judge Martinotti and the defendants.**

For reference purposes:

K1-Kaul v Christie: 16-CV-02364

K2-Kaul v Christie: 18-CV-08086

K3-Kaul v Schumer: 19-CV-13477

K4-Kaul v Stolz: 19-CV-01489 + Appeal: 18-CV-16485

P1-Patel v Allstate: 19-CV-08946

P2-Patel v Allstate: 19-CV-09232

**PLEASE POST TO THE DOCKETS IN ALL OF THE ABOVE CASES**

Dear Judge Martinotti,

I ("Kaul") write this letter to provide you an opportunity to deny or confirm the following statements:

1. I have knowledge that on July 29, 2019 at 1:55 pm EST Kaul sent via e-mail a copy of a motion (copy enclosed) requesting that I certify Kaul's application for interlocutory review of the order ("application") I entered on June 26, 2019.
2. At some point in time between 1:55 pm EST on July 29, 2019 and 10:33 am EST on July 30, 2019, I became aware of the application.
3. At some point in time between 1:55 pm EST on July 29, 2019 and 10:33 am EST on July 30, 2019, there did occur communications (e-mail, text, phone, face-to-face, hand written notes) ("communications") between myself and or agents acting on my behalf, and the defendants and or agents acting on their behalf.

4. The communications informed me that Kaul was intending to file the application.
5. Upon becoming aware of the application, I and or agents acting on behalf inquired of the Clerk's Office, as to whether the application had been filed with the Court.
6. Upon becoming aware that the application had not been filed with the Clerk's Office, it became my intention to file an order that dismissed K1, and to order the court docket closed.
7. It was my intention to close the court docket in order to prevent the application from being entered onto the record.
8. My purpose in preventing the entry of the application onto the court record, was to intentionally exclude it from appellate review.
9. I understood that by excluding the application from appellate review, it would lessen the possibility of reversal of my order of dismissal.
10. I understand that the communications between myself and or agents acting on my behalf, and the defendants and or agents acting on their behalf constitute improper and illegal ex-parte interactions.
11. I understand that these improper ex-parte communications are part of a wider series of schemes ("schemes") of bribery and corruption within the United States District Court for the District of New Jersey ("court")
12. I have knowledge and have participated in the schemes.
13. I have knowledge that other judges currently within the court have participated, and do participate, in the schemes.
14. I have knowledge that ex-chief judge, Jose Linares ("Linares") participated in the schemes.
15. I have knowledge that Linares retired on May 16, 2019, because of a letter he received from Kaul and Patel, in which they demanded he disclose his financial holdings and conflicts of interest (copy enclosed).
16. I have knowledge that on May 16, 2019 Linares was made a partner at a New Jersey law firm by the name of McCarter and English.
17. I have knowledge that the law firm of McCarter and English provided the partnership to Linares as part of the scheme, and in return for having provided partial judgments in cases that involved this New Jersey law business.
18. My appointment to the federal bench was sponsored by Senators Robert Menendez and Cory Booker ("senators").
19. I have discussed the above cases with the senators.
20. I have knowledge that the senators have received political campaign donations from some of the defendants in the above cases.
21. I have knowledge that the senators have been promised future political campaign donations from some of the defendants, based on dismissals of the above cases.
22. I have knowledge that defendants Allstate and Geico bribed the senators, as part of a series of quid pro quo schemes purposed to have the cases dismissed.
23. I and or members of my family to the third-degree, have received from the defendants, monies and or other benefits, of both a tangible and intangible nature.

24. I have knowledge that certain judges within the Third Circuit Federal Court of Appeals have received from the defendants, monies and or other benefits, of both a tangible and intangible nature.
25. I did consult and collaborate with Judge Kevin McNulty before I issued my opinion and order dismissing K1.
26. I never had any intention of issuing an opinion that diverged with that issued by Judge McNulty, regardless of the law and facts.
27. I knew that my representations in court on June 26, 2019, were intended to deceive Kaul into thinking that I might not dismiss K1, and to dishonestly impart to the record an appearance of impartiality, for the purposes of appellate review.

I respectfully request that by August 8, 2019, you confirm or deny the above statements. If no responses are produced by this date, your non-response will cause the above statements to be admitted, and I will move accordingly.

I would also respectfully request that you submit to the record in above cases, a copy of form AO 10A, as requested in a letter submitted on July 1, 2019 (copy enclosed).

A copy of this letter, and a letter pertaining to the above matters, as they relate to all judges within the United States District Court for the District of New Jersey, will be sent within the next week.

Thank you in advance for your attention to this matter.

Yours sincerely



Richard Arjun Kaul, MD  
cc: All Counsel via e-mail  
Judge Joseph Dickson  
Clerk of the Court

[www.drrichardkaul.com](http://www.drrichardkaul.com)

July 1, 2019

The Honorable Brian R. Martinotti  
District Judge  
United States District Court  
District of New Jersey  
50 Walnut Street  
Newark, NJ 07102

**Re: Kaul v Christie, et al.**  
**Docket No. 16-CV-02364**  
**Submission of Form AO 10A**

For reference purposes:

K1- Kaul v Christie: 16-CV-02364  
K2-Kaul v Christie: 18-CV-08086  
K3-Kaul v Schumer: 19-CV-13477  
K4-Kaul v Stolz: 19-CV-01489 + Appeal: 2:18-CV-16485

Dear Judge Martinotti,

I write this letter in response to that submitted on June 28, 2019 by the defendants (D.E. 382 Page ID 9290).

However, before I specifically address the defendants' letter, I believe it is important for this record to be appraised of the following substantive and procedural irregularities that occurred in your courtroom on Wednesday June 26, 2019, between approximately 12:15 pm EST and 1:00 pm EST:

1. The court commenced the proceeding by asserting that the case had been dismissed by Judge McNulty.
2. The court then encouraged the defendants to bolster this position, and for approximately ten minutes, counsel for defendant Geico, Barry Levy, advocated, without a hint of equivocality, that the case had indeed been dismissed.
3. The court then turned its ostensibly prejudicial attention to me, in order that I might respond to the defendants' misstatement of the case. My respectful suggestion to

summarize the relevant chronology, in order to disprove the defendants falsehood, was curtly and without good cause, obstructed by the court. I was forced to provide a truncated version of the procedural events that occurred subsequent to Judge McNulty's "**rushed reaction to Kaul's motion for summary judgment against Defendant Allstate New Jersey Insurance Company, a fact that explains it's multiple errors of fact and law.**" (D.E. 313-1 Page 8422 Para. 97).

4. Despite what appeared to me, and other independent observers of the proceeding to be an effort to hinder my response to the defendants, I brought to the court's attention the fact that the case was not dismissed, but was in fact open. The defendants knew this, and accepted this unrebutted fact, a fact that they could have contested by seeking leave of court to contest, pursuant to Local Rule 7.1(d)(3) (D.E. 341 Page ID 8677). The defendants did not rebut this fact, because they knew the case was and is open: "**The moment Judge McNulty permitted the defendants to respond to 'The McNulty Analysis', was the moment the claims became undismissed, and thus pending ... The Court confirmed this position in its order of April 1, 2019: "This order should not be taken as confirmation that there is a final appealable decision" ... It is within sixty (60) days from this point, that discovery commences. This is supported in law (D.E. 313 Page ID 8381)..."**" (D.E. 341 Page ID 8704).
5. Having argued that the case was open, the court, evidently not having verified this critical detail pre-proceeding, instructed the court clerk to ascertain its status on the court's computer network. This one-minute search confirmed that the case was open, but the court failed to require the defendants explain their misrepresentation.
6. Having established that the case was open, Kaul requested the court grant the twenty-two (22) motions for summary judgment, and or grant discovery and the right to amend the Second Amended Complaint. All of these requests were denied, further and continuing evidence of the defendants'/Court's obstruction of Kaul's prosecution of the case. Kaul has argued since April 2016 that he would not receive "**substantive justice**" in New Jersey and that the case must be transferred out of the District of New Jersey: "**Thus, if Judge McNulty chooses not to disqualify himself, the Court must transfer the case to the S.D.N.Y., and even if he does, the Court must still transfer the case, because it is conflicted and corrupted.**" (D.E. 341 Page ID 8705).
7. Kaul requested the court provide reasons for the denials of discovery, summary judgment and amendment, but none were forthcoming. The decisions appeared arbitrary, but Kaul respectfully asserts they were consistent with, and in furtherance of the court's corrupted position and pre-determined strategy to dismiss Kaul's claims. This might explain the not so well concealed, 'the fix is in', joviality displayed by certain members of the defendants' defense team. Regardless, the case was open and the court should have adjudicated Kaul's motions for summary judgment.

8. However, the court administratively terminated Kaul's summary judgment motions, but erroneously requested the defendants provide a list of the documents, upon which it wanted the court to determine what Judge McNulty framed as Kaul's "**motion for reconsideration**", aka, 'The McNulty Analysis' (D.E. 313-1 Page ID 8384). 'The McNulty Analysis' is not a motion for reconsideration (D.E. 313-1 Page ID 8385).
9. On June 28, 2019 the defendants submitted a letter, the contents of which further prove that 'The McNulty Analysis' was and is not a "**motion for reconsideration**". A motion for reconsideration permits only the aggrieved party to submit opposition papers to the order in question. It does not permit any other parties to submit any other documents, and if the court permits such conduct, then the case remains open, and thus the court must timely adjudicate any subsequent or pending motions, in accordance with Rule 1 of the Federal Rules of Civil Procedure. The court in failing to adjudicate Kaul's motions dispositive motions for summary judgment has knowingly committed clear and convincing error. The court's view of Kaul's perceived ignorance of the law, manifested itself in its repeated and tonally derogatory statements regarding Kaul's comprehension of the proceedings. This is consistent with its intentional commission of error i.e. we think Kaul is too stupid to know we are perpetrating a scheme to have the case dismissed.
10. The **only** documents that the court can consider within the confines of a motion for reconsideration are: (i) Judge McNulty's opinions (D.E. 300 + 301 + 303 + 304); (ii) 'The McNulty Analysis' (D.E. 313-1 Page ID 8385). Judge McNulty, "**permitted the defendants to file opposition papers. The purpose of this was to attempt to improperly mitigate the risk of reversal on appeal, and to improperly mitigate the risk of reversal on appeal ... further evidence in support of Kaul's strenuously asserted argument that he would not receive "substantive justice" in New Jersey**". This court continues the more than seven-year long violation of Kaul's basic human rights, his right to due process, and his right to justice, all of which have been denied in every administrative + state (civil + family) and federal court within the geographic boundaries of New Jersey. This is why K1 + K2 + K3 will be transferred out of this district court.
11. Finally, and unquestionably the most critical element of these proceedings is the as yet unfulfilled obligation of Judge Martinotti to disclose to the record, the Court and Kaul his financial holdings and conflicts of interest. The fact that this information was not placed on the record, in light of all the circumstances of this "**fantastical**" case, causes Judge Martinotti to remain without the proper authority to adjudicate this case. If Judge Martinotti is conflicted or his financial holdings connect him in any manner to any of the defendants or their agents, he must disqualify himself, and can have no further involvement in the case. The law demands that he follow the law in this regard, and submit Form AO 10A. On June 28, 2019 I submitted a letter that requested this information from every judge in the United States District Court for the District of New Jersey (copy enclosed). If this information is not provided by 5 pm EST on Monday July 1, 2019, then K1 + K2 + K3 must, in the interests of justice, be transferred out of the District of New Jersey.



I, therefore, respectfully request that until the above conditions are met, the interests of justice demands this case proceed no further.

I thank you in advance, for your prompt attention to this matter.

Yours sincerely

Richard Arjun Kaul, MD  
cc: All Counsel via e-mail  
Judge Joseph A. Dickson  
Clerk of the Court

U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
RECEIVED

[www.drrichardkaul.com](http://www.drrichardkaul.com)

2019 JUN 28 P 2:23

June 27, 2019

The Honorable Chief Judge Freda Wolfson  
United States District Court  
District of New Jersey  
50 Walnut Street # 4015  
Newark, NJ 07102

Re: K1 - Kaul v Christie: 16-CV-02364  
K2 – Kaul v Christie: 18-CV-08086  
P1 – Patel v Crist: 19-CV-08946  
P2 – Patel v Allstate: 19-CV-09232  
Submission to the dockets of form AO10 by judges in the United States District Court for the District of New Jersey.

Dear Judge Wolfson,

I write this letter, lieu of a more formal brief, to request that you order Judges Linares and McNulty to immediately submit onto the court docket their AO 10A financial disclosure/conflict forms. It is my position that these jurists were bribed by the defendants in the above matters, as part of a series of quid pro quo schemes, in which Judges Linares and McNulty abused the authority of the United States District Court to obstruct my prosecution of the aforesaid cases.

On May 16, 2019, a letter addressed to ex-Chief Judge Linares, was filed onto the P1 court docket (P1-D.E. 44 Page 851 – copy enclosed), in which I and Plaintiff Patel requested Judge Linares disclose his financial holdings:

**“We also request, with all due respect, that in light of your involvement in the cases, you disclose to us, the record and the Court, your financial disclosure statement and a complete and comprehensive list of any and all conflicts of interest, past or present, that involve you and any members of your family, to the third-degree.”**

Judge Linares failed to provide this information, but instead suddenly retired from the bench (P1-D.E. 52 Page 960 – copy enclosed):

**“We requested that the information be provided by May 22, 2019, but Chief Judge Linares retired on May 16, 2019, after only two years in this position, and needless to say, he failed to submit the conflict and financial disclosure information.”**

On June 5, 2019 (K1-D.E. 366) the Court appointed Judge Brian Martinotti to the above cases. Judge Martinotti has not yet submitted his financial holdings and any conflicts of interest, and I would request that you order the immediate disclosure of this information.

I would like to re-iterate my position that **“Judges McNulty and Linares have engaged in prolonged patterns of judicial corruption, in which they used the power of the federal bench to improperly and illegally advance their personal commercial agendas ... It is also our position that Judge McNulty ought to be impeached and Judge Linares be subject to criminal investigation...”** (P1-D.E. 52 – copy enclosed).

In furtherance of my frequently repeated claim that I would not receive **“substantive justice”** (United States Court of Appeals for the 2<sup>nd</sup> Circuit: Case No. 16-1397 Page 4 of 170) in any court within the geographic boundaries of the State of New Jersey, I respectfully request that you order every judge in this court to disclose to the record his or her financial holdings and any conflicts of interest.

I respectfully inform the Court that if the above requested information is not provided by 5 pm EST on Monday July 1, 2019, I will move in the United States Court of Appeals for the Third Circuit for a writ of mandamus, a copy of which will be filed with the United States Supreme Court. I shall also bring this issue to the attention of the President of the United States of America.

A dishonest judiciary is inimical to the good order of society and I imagine its prevalence in the District of New Jersey, would be a political embarrassment to the presidential aspirations of the U.S. Senator from New Jersey, Cory Booker. I believe he and Senator Menendez sponsored the appointment of Judge Martinotti to the federal bench.

I look forward to receiving the above requested information, and I thank you in advance for your prompt attention to these very serious matters.

Yours sincerely

*R. Kaul*

Richard Arjun Kaul, MD  
cc: All Counsel via e-mail  
Clerk of the Court  
Judge Brian Martinotti

Case 2:19-cv-08946-KM-SCM Document 44 Filed 05/16/19 Page 1 of 3 PageID: 850

May 9, 2019  
2019 MAY 10 P 4: 20

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The Honorable Jose L. Linares  
Chief Judge  
United States District Court  
District of New Jersey  
50 walnut Street #4015  
Newark, NJ 07102

**Re: Patel v Crist, et al**  
**Docket No. 19-CV-08946 – P1**  
**Patel v Allstate, et al**  
**Docket No. 19-CV-09232 – P1**

For reference purposes:  
Kaul v Christie: 16-CV-02364 – K1  
Kaul v Christie: 18-CV-08086 – K2  
Kaul v Schumer: 19-CV-3046 – K3

Dear Judge Linares,

We write this letter to bring to the Court's attention, that on May 8, 2019, a motion for the judicial disqualification of Judge Kevin McNulty was filed in K1 + K2, and that this therefore precludes Judge Kevin McNulty from any further involvement in the case, be it administrative, ministerial, or judicial.

It is also our position, as is similarly stated in 'The McNulty Disqualification', that Judge McNulty is conflicted, as he and his law firm, K3 defendant, Gibbons, PC, remain commercial beneficiaries of the defendants. We believe that this conflict is evidenced by the fact that the cases, after having been transferred on March 25, 2019 to the United States District Court for

- Case 2:19-cv-08946-KM-SCM Document 44 Filed 05/16/19 Page 2 of 3 PageID: 851

the District of New Jersey (D.E. 22), and assigned to Judge Freda Wolfson, were then, on March 27, 2019, transferred to Judge Kevin McNulty. The Court provided no reason to justify this transfer, and we respectfully assert that the purpose is exactly that detailed in 'The McNulty Disqualification' i.e. judicial corruption + bribery.

Judge McNulty, since having the cases come under his remit, has not, as the law requires, disclosed to either us, the record or the Court his financial disclosure statement, or indeed his conflicts of interest, past or present. We consider this to be evidence that he is in fact conflicted, and is thus prohibited from any further involvement in the cases.

We also request, with all due respect, that in light of your involvement in the cases, you disclose to us, the record and the Court, your financial disclosure statement and a complete and comprehensive list of any and all conflicts of interest, past or present, that involve you and or any members of your family, to the third-degree. We believe it to be a conflict of interest that your son, Jose L. Linares, is employed by the law firm of Walsh + Pizzi + O'Really + Falanga, a law firm whose principal is married to the Clerk of the Court, William Walsh, and one that represents defendant Hackensack University Medical Center and Robert Garrett in K1 + K2.

We respectfully request that the aforementioned information be provided by May 22, 2019 by the close of business in your court.

In full recognition of your esteemed position within the judicial body of the United States of America, and of your purpose to do justice, we assert that because of the **"politico-legal"** nexus that undeniably connects the federal judiciary with the body politic, it would not serve the interests of justice to have any of the above cases litigated in any court, within the geographic boundaries of New Jersey. At the heart of these matters are located state actors, state agencies and the state itself, the interests of which are interminably intertwined with the interests of New Jersey lawyers + state judges + New Jersey based federal judges. Simply, as a point of historical interest, the untenability of such a situation was recognized in Spain, after the fall of Franco, when members of the Guardia Civil and Spanish federal judiciary were assigned to provinces in which they had no connections with the local community. This remains the case today, and for good reason, and it was because of this political impartiality that it was a Spanish Judge, Baltasar Garzon, who had General Augusto Pinochet arrested, in 1998, in London for his crimes against humanity. This is the standard to which all jurisprudence should compare itself.

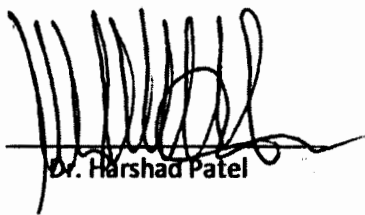
With regards to crimes against humanity, K2 defendant, Christopher J. Christie is no stranger (D.E. 296-11 Page 6973).

It is thus therefore, proper and consistent with the interests justice to have the above cases adjudicated in district courts not within the geographic boundaries of New Jersey, and we would respectfully request that you transfer P1 + P2 back to the United States District for the Northern District of Georgia, no later than May 22, 2019.

We thank you for your attention to this matter.

- Case 2:19-cv-08946-KM-SCM Document 44 Filed 05/16/19 Page 3 of 3 PageID: 852

Yours sincerely



Dr. Harshad Patel

cc: All Counsel of record  
Clerk of the Court

*R. Kaul*

---

Richard Arjun Kaul, MD

Case 2:19-cv-08946-BRM-JAD Document 52 Filed 06/03/19 Page 1 of 9 PageID: 960

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U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
RECEIVED

2019 JUN -3 P 2:47

06-03-2019  
RICHARD ARJUN KAUL, MD  
440c SOMERSET DRIVE  
PEARL RIVER, NY 10965  
201 989 2299  
drrichardkaul@gmail.com

The Honorable Chief Judge Freda Wolfson  
United States District Court  
District of New Jersey  
50 Walnut Street #4015  
Newark, NJ 07102

Re: **Patel v Crist, et al**  
**Docket No. 19-CV-08946 – P1**  
**Patel v Allstate, et al**  
**Docket No. 19-CV-09232 – P1**

For reference purposes:

Kaul v Christie: 16-CV-02364 – K1  
Kaul v Christie: 18-CV-08086 – K2  
Kaul v Schumer: 19-CV-3046 – K3

Dear Judge Wolfson,

On May 9, 2019 we sent a letter (<sup>Ex-1</sup>copy enclosed) to recently retired Chief Judge, Jose Linares, in which we requested that he provide to us, the record and the Court, a copy of his AO10 financial disclosure form, and a **"complete and comprehensive list of any and all conflicts of interest, past or present"** that involved either Judge Linares or any members of his family to a third degree. This letter was filed in the late drop box by Dr. Patel on May 10, 2019, but has still not appeared on the docket. We requested that the information be provided by May 22, 2019, but Chief Judge Linares retired on May 16, 2019, after only two years in this position, and needless to say, he failed to submit the conflict and financial disclosure information.

In this letter we also raised the issue that Judge McNulty, since taking assignment of K1 on April 19, 2016, had failed to disclose his conflicts of interest and financial holdings, and in the context

Case 2:19-cv-08946-BRM-JAD Document 52 Filed 06/03/19 Page 2 of 9 PageID: 961

of the facts that underpin the disqualification of Judge McNulty, we interpret these omissions as evidence of his conflicted state.


On May 2, 2019 I electronically submitted a REQUEST FOR EXAMINATION OF REPORT FILED BY A JUDICIAL OFFICER OR JUDICIAL EMPLOYEE (~~copy enclosed~~), pertaining to Judge McNulty and ex-Chief Judge Linares. *EX-2*

It is our position that Judges McNulty and Linares have engaged in prolonged patterns of judicial corruption, in which they used the power of the federal bench to improperly and illegally advance their personal commercial agendas. We suspect that this misconduct has been in existence for many years, and has involved many cases, and likely led to many injustices, in both civil and criminal cases. It is also our position that Judge McNulty ought to be impeached, and Judge Linares be subject to an independent criminal investigation, and we will ensure that these events come to pass. No one is above the law, particularly those to whom it is entrusted by society.

We would therefore respectfully request that by June 22, 2019, we be provided with a complete and comprehensive list of all of Judge McNulty and Linares' conflicts of interest and financial holdings, dating back to 2003 for Judge Linares and 2012 for Judge McNulty. We also respectfully request that we be provided with a complete list of all cases over which Judges McNulty and Linares have presided, for the same respective time periods.

We thank you for your consideration.

Yours sincerely



Dr. Manish Patel

*R. Kaul*

Richard Arjun Kaul, MD

cc: All Counsel of record  
Clerk of the Court  
Judge Steven C. Mannion



Case 2:19-cv-08946-BRM-JAD Document 52 Filed 06/03/19 Page 3 of 9 PageID: 962

## **Exhibit 1**

Case 2:19-cv-08946-BRM-JAD Document 52 Filed 06/03/19 Page 4 of 9 PageID: 963

May 9, 2019

DR. HARSHAD PATEL  
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U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
RECEIVED  
2019 JUN -3 PM 2:48

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The Honorable Jose L. Linares  
Chief Judge  
United States District Court  
District of New Jersey  
50 Walnut Street #4015  
Newark, NJ 07102

**Re: Patel v Crist, et al**  
**Docket No. 19-CV-08946 – P1**  
**Patel v Allstate, et al**  
**Docket No. 19-CV-09232 – P1**

For reference purposes:  
Kaul v Christie: 16-CV-02364 – K1  
Kaul v Christie: 18-CV-08086 – K2  
Kaul v Schumer: 19-CV-3046 – K3

Dear Judge Linares,

We write this letter to bring to the Court's attention, that on May 8, 2019, a motion for the judicial disqualification of Judge Kevin McNulty was filed in K1 + K2, and that this therefore precludes Judge Kevin McNulty from any further involvement in the case, be it administrative, ministerial, or judicial.

It is also our position, as is similarly stated in 'The McNulty Disqualification', that Judge McNulty is conflicted, as he and his law firm, K3 defendant, Gibbons, PC, remain commercial beneficiaries of the defendants. We believe that this conflict is evidenced by the fact that the cases, after having been transferred on March 25, 2019 to the United States District Court for

Case 2:19-cv-08946-BRM-JAD Document 52 Filed 06/03/19 Page 5 of 9 PageID: 964

the District of New Jersey (D.E. 22), and assigned to Judge Freda Wolfson, were then, on March 27, 2019, transferred to Judge Kevin McNulty. The Court provided no reason to justify this transfer, and we respectfully assert that the purpose is exactly that detailed in 'The McNulty Disqualification' i.e. judicial corruption + bribery.

Judge McNulty, since having the cases come under his remit, has not, as the law requires, disclosed to either us, the record or the Court his financial disclosure statement, or indeed his conflicts of interest, past or present. We consider this to be evidence that he is in fact conflicted, and is thus prohibited from any further involvement in the cases.

We also request, with all due respect, that in light of your involvement in the cases, you disclose to us, the record and the Court, your financial disclosure statement and a complete and comprehensive list of any and all conflicts of interest, past or present, that involve you and or any members of your family, to the third-degree. We believe it to be a conflict of interest that your son, Jose L. Linares, is employed by the law firm of Walsh + Pizzi + O'Really + Falanga, a law firm whose principal is married to the Clerk of the Court, William Walsh, and one that represents defendant Hackensack University Medical Center and Robert Garrett in K1 + K2.

We respectfully request that the aforementioned information be provided by May 22, 2019 by the close of business in your court.

In full recognition of your esteemed position within the judicial body of the United States of America, and of your purpose to do justice, we assert that because of the "politico-legal" nexus that undeniably connects the federal judiciary with the body politic, it would not serve the interests of justice to have any of the above cases litigated in any court, within the geographic boundaries of New Jersey. At the heart of these matters are located state actors, state agencies and the state itself, the interests of which are interminably intertwined with the interests of New Jersey lawyers + state judges + New Jersey based federal judges. Simply, as a point of historical interest, the untenability of such a situation was recognized in Spain, after the fall of Franco, when members of the Guardia Civil and Spanish federal judiciary were assigned to provinces in which they had no connections with the local community. This remains the case today, and for good reason, and it was because of this political impartiality that it was a Spanish Judge, Baltasar Garzon, who had General Augusto Pinochet arrested, in 1998, in London for his crimes against humanity. This is the standard to which all jurisprudence should compare itself.

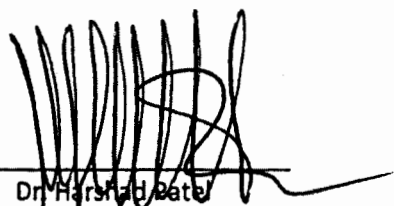
With regards to crimes against humanity, K2 defendant, Christopher J. Christie is no stranger (D.E. 296-11 Page 6973).

It is thus therefore, proper and consistent with the interests justice to have the above cases adjudicated in district courts not within the geographic boundaries of New Jersey, and we would respectfully request that you transfer P1 + P2 back to the United States District for the Northern District of Georgia, no later than May 22, 2019.

We thank you for your attention to this matter.

Case 2:19-cv-08946-BRM-JAD Document 52 Filed 06/03/19 Page 6 of 9 PageID: 965

Yours sincerely



Dr. Harshad Patel

cc: All Counsel of record  
Clerk of the Court

*R. Kaul*  
Richard Arjun Kaul, MD

Case 2:19-cv-08946-BRM-JAD Document 52 Filed 06/03/19 Page 7 of 9 PageID: 966

## **Exhibit 2**

Gmail - Request for Financial Disclosure Statements Case 2:19-cv-08946-BRM-JAD Document 52 Filed 06/03/19 Page 8 of 9 PageID: 9675/29/19, 1:53 PM



## Request for financial disclosure statements

Richard Kaul <drrichardkaul@gmail.com>  
To: CommitteeonFinancialDisclosure@ao.uscourts.gov

Thu, May 2, 2019 at 6:25 PM

Dear Sir/Madam,

Please find attached the following document:

1. Request for financial disclosure statements for:
  - a. Judge Kevin McNulty - United States District Judge for the District of New Jersey.
  - b. Chief Judge Jose Linares - United States Chief Judge for the District of New Jersey.

Thank you in advance

Regards,

Richard Arjun Kaul, MD

[www.drrichardkaul.com](http://www.drrichardkaul.com)

 190502-Request Financial Disclosure-McNulty + Linares.pdf  
569K

2019 JUN -3 P 2:48  
U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
RECEIVED

AG 10A (Rev. 03-17)

**REQUEST FOR EXAMINATION OF REPORT FILED BY  
A JUDICIAL OFFICER OR JUDICIAL EMPLOYEE**

In accordance with section 105 of the Ethics in Government Act of 1978, as amended, I request that the report of the following named Judicial Officers or Judicial Employees be sent to me in electronic form. By checking this box, I am requesting a paper copy rather than an electronic copy  (See instructions).

NAMES OF INDIVIDUALS WHOSE DISCLOSURE REPORTS ARE REQUESTED	NAME	POSITION	YEAR(S) REQUESTED
		Kevin McNulty- District Judge	United States Court for the DNJ
	Joseph Linares - Chief Judge	United States Court for the DNJ	2002-2019

ORGANIZATIONS OR PERSONS ON WHOSE BEHALF THIS REQUEST IS MADE	NAME	ADDRESS
	Richard Arjun Kaul, MD	440c Somerset Drive, Pearl River, NY 10965

**PROHIBITIONS**

I understand that the statute makes it unlawful to obtain or use this or these reports for: any unlawful purpose; any commercial purpose other than by news and communication media for dissemination to the general public; determining or establishing of the credit rating of any individual; or use, directly or indirectly, in the solicitation of money for any political, charitable, or other purpose (5 U.S.C. App. 4 § 105(e)).

I understand that whoever, in any manner within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully (1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact; (2) makes any materially false, fictitious, or fraudulent statement or representation; or (3) makes or uses any false writing or document, knowing the same to contain any materially false, fictitious, or fraudulent statement or entry, shall be fined not more than \$10,000 or imprisoned not more than five years, or both (18 U.S.C. § 1001).

I am aware of the prohibitions on the obtaining and use of this information, as are stated above, and that this request for examination is a matter of public record.

<b>PERSON MAKING REQUEST</b>	Name: Richard Arjun Kaul, MD	Occupation: Currently unemployed
	Phone Number: 201 989 2299	Email Address: drrichardkaul@gmail.com
	Mailing Address: 440c Somerset Drive, Pearl River, NY 10965	
	I certify under penalty of perjury that the foregoing is true and correct. (28 U.S.C. § 1746)	
	<i>RJK</i> Signature	May 2, 2019 Date executed

[www.drrichardkaul.com](http://www.drrichardkaul.com)

August 19, 2019

U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
RECEIVED

2019 AUG 19 P 3:16

The Honorable Chief Judge Freda Wolfson  
United States District Court  
District of New Jersey  
50 Walnut Street #4015  
Newark, NJ 07102

**Re: Kaul v Christie, et al.,  
Docket No. 16-CV-02364 – K1  
Petition to the United States Appeals Court for the Third Circuit for a writ of mandamus  
ordering district court judges to disclose their financial holdings and conflicts of interest.**

Dear Chief Judge Wolfson,

Please find submitted a copy of the above document, the original of which will be filed with the United States Appeals Court for the Third Circuit.

Yours sincerely

*R. Kaul*

Richard Arjun Kaul, MD  
cc: All Counsel via e-mail  
Judge Brian R. Martinotti  
Judge Joseph Dickson  
Clerk of the Court



**United States Court of Appeals**

**for the**

**Third Circuit**

**Richard Arjun Kaul, MD**

**Petitioner**

---

**On Petition for a Writ of Mandamus to the U.S. District Court for the  
District of New Jersey in Case No. 16-CV-02364-BRM-JAD  
Richard Arjun Kaul, MD v. Christopher J. Christie, Esq, et al.**

---

**PETITION FOR A WRIT OF MANDAMUS**

**Richard Arjun Kaul, MD  
Propria Persona  
440c Somerset Drive  
Pearl River, NY 10965  
201 989 2299  
[drichardkaul@gmail.com](mailto:drichardkaul@gmail.com)**

**Dated: August 19, 2019**

## **Certification of word, line and page count**

I, Richard Arjun Kaul, MD, the Petitioner, do hereby certify under penalty of perjury that this document consists of: (i) Thirty-Nine (39) pages; (ii) Six Hundred and Eighteen double-spaced lines (618); (iii) Seven Thousand, and Eighty-Eight (7,088) words

Dated: August 19, 2019

*R. Kaul*

---

Richard Arjun Kaul, MD

### For Reference Purposes:

**K1: Kaul v Christie: 16-CV-02364 – U.S.D.C. for D.N.J**

**K2: Kaul v Christie: 18-CV-08086 – U.S.D.C. for D.N.J.**

**K3: Kaul v Schumer: 19-CV-13477 – U.S.D.C. for D.N.J.**

**K4: Kaul v Stolz: 18-CV-01489 – United States Bankruptcy Court for D.N.J.**

**K4 Appeal: 18-CV-16485 – U.S.D.C. for the D.N.J.**

**P1: Patel v Allstate: 19-CV-08946 – U.S.D.C. for D.N.J.**

**P2: Patel v Allstate: 19-CV-09232 – U.S.D.C. for D.N.J**

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4. Standard of Review Under The All Writs Act.....	7
5. Facts Necessary To Understand Petition.....	9
6. Reasons For Granting The Writ.....	26
a. Kaul respectfully asserts that the refusal of the district court judges to provide their financial holdings and conflicts of interest is because they have been corrupted and are conflicted. This corruption and conflicts of interest have caused the non-adjudication of motions, have obstructed Kaul’s prosecution of the case, have caused the entry of illegal orders, and a dismissal of the case.....	26
b. Kaul respectfully asserts that the law finds that a Writ of Mandamus is a legitimate legal instrument to effectuate the interests of justice, when a district judge/s admits to having engaged in bribery/ex parte communications, but refuses to submit his/her financial disclosures/conflicts of interest.....	28
c. Kaul respectfully asserts that certain district court judges have either failed to file forms AO10, and or submitted inaccurate information in violation of 5 U.S.C. app. § 104, thus precluding Kaul from fully ascertaining their financial holdings and conflicts of interest.....	29

d. Kaul respectfully requests that this Court emergently grant Kaul’s petition for a writ of mandamus, that Kaul asserts will (i) prove the district court judges are conflicted and corrupted; (ii) prove that their orders are illegal, which will; (iii) mandate the illegal orders be made NULL AND VOID and that all Kaul related cases be TRANSFERRED OUT of the District of New Jersey and; (iv) mandate the entry of summary judgment against all defendants.....31

e. Kaul respectfully requests that this Court grant his petition for a writ of mandamus as it will not impinge on the district court’s inherent case management authority, but will mitigate the defendants/district court’s obstruction of Kaul’s prosecution of the case.....33

f. Kaul respectfully assert that his application for a writ of mandamus satisfies the “three conditions” set forth by the United States Supreme Court.....35

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**Relief Sought**

Petitioner Richard Arjun Kaul, MD (“Kaul”) respectfully requests that this Court grant Kaul’s petition for a writ of mandamus and direct the district court judges of the United States District Court for the District of New Jersey, to immediately disclose their financial holdings and conflicts of interest.

## **Issues Presented**

- (1) Whether the law demands that the district court judges of the United States District Court for the District of New Jersey are obligated to disclose their financial holdings and conflicts of interest.
- (2) Whether this Court, upon a finding that Judges Linares, McNulty and Martinotti were conflicted, should reverse all orders entered in this case.
- (3) Whether this Court, upon a finding that Judges Linares, McNulty and Martinotti were conflicted, should transfer K1, K2, K3, P1 and P2 out of the United States District Court for the District of New Jersey.
- (4) Whether this Court should stay all proceedings in K1, K2, K3, P1 and P2 until every judge in the United States District Court for the District of New Jersey has disclosed their financial holdings and conflicts of interest.

## **Standard of Review Under The All Writs Act**

The All Writs Act, 28 U.S.C. §1651, authorizes the issuance of all writs necessary or appropriate in aid of the court's jurisdiction. The power of an

original panel of a United States Court of Appeals to grant relief enforcing and protecting the terms of its mandate is well established in the Supreme Court, this Circuit and other federal courts of appeal<sup>1</sup>. For example, in *Citibank v. Fullum*, this Court noted that:

Despite federal appellate courts' general reluctance to grant writs of mandamus ...The Supreme Court has repeatedly held that an appellate court has jurisdiction under U.S.C. §1651 to issue a writ of mandamus to compel an inferior court to comply<sup>2</sup>

To obtain a writ of mandamus in the Third Circuit, a party must show “**(1)** a clear abuse of discretion or clear error of law; **(2)** a lack of an alternative avenue for adequate relief; and **(3)** a likelihood of irreparable injury.”

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1. *FTC v. Dean Foods Co.*, 384 U.S. 597 (1966); *US v. NY Tel. Co.*, 434 US 159 (1977); *Cheney v. United States Dist. Court*, 542 U.S. 367, 381 (2004); *Citibank v. Fullum*, 580 F.2d 82 (3d Cir. 1978); *US v. Wexler*, 31 F3d 117 (3d Cir. 1995); *US v. Apple MacPro Computer*, 851 F3d 238 (3d Cir. 2017); *City of Cleveland v. FPC*, 561 F.2d 344, 346 (D.C. Cir. 1977); *ILGWU v. Donovan*, 773 F2d 920 (D.C. Cir. 1984)(per curiam); *PEPCO v. ICC*, 702 F.2d 1026 (DC Cir. 1993); *In re People's Mojahedin Organization of Iran*, 680 F.3d 832 (D.C. Cir. 2012); *Iowa Util. Bd v. FCC*, 135 F3d 535 (8<sup>th</sup> Cir. 1998) vacated on other grounds; *In re FCC*, 217 F.3d, 125 (2d Cir. 2000); *Am. Trucking Assoc. v. ICC*, 669 F2d 957 (5<sup>th</sup> Cir. 1982); *In re March*, 988 F.2d 498 (4<sup>th</sup> Cir. 1993)

2. 580 F.2d at 86-87 (citations omitted)



## **Facts Necessary To Understand Petition**

This petition comes before the Court seeking that it issue a writ of mandamus to all judges in the district court disclose to the record, the Court and Kaul form AO 10A. The following facts are consistent with Kaul's argument that the orders/rulings/decisions of the district court were not legitimately based in law and fact, but were a direct consequence of a quid pro schemes between the district judges and the defendants, in which the defendants bribed the judges to enter orders adverse to Kaul, and to have the case dismissed. The final order (D.E. 385 Page ID 9330) simply states that the case is closed, not dismissed. The following facts lend substantial weight to the proposition that the defendants have corrupted the district court and its judges. This petition seeks to have the district judges be ordered, to disclose their financial holdings and conflicts of interest, in order that the case be thoroughly examined for the offense of public corruption. This is in the interest of the public, and particularly to those litigants who might have had cases before judges, who failed to disclose to these parties, their conflicts of interest. The facts in support of this application, are organized below in chronological order:

**1. May 2, 2019: REQUEST FOR EXAMINATION OF REPORT FILED BY A JUDICIAL OFFICER OR JUDICIAL EMPLOYEE (K1 – D.E. 383**

**Page ID 9304)** – Kaul received no response to his request, from the Committee on Financial Disclosure.

**2. May 6, 2019: Motion for judicial disqualification of Judge Kevin McNulty + Transfer of cases to the United States District Court**

**for the Southern District of New York (K1 - D.E. 334 Page ID**

**8591)** – On May 22, 2019 (D.E. 340 Page ID 8670), Judge McNulty

became disqualified, and thus the following charges were proved: **(i)**

Judge McNulty had the appearance of bias; **(ii)** Judge McNulty was

biased and prejudiced against Kaul, and had personal knowledge of

disputed evidentiary facts concerning the proceeding; **(iii)** Judge

McNulty, when in private practice, served as a lawyer in the mater in

controversy, and a lawyer with whom he previously practiced law,

represents two of the defendants; **(iv)** Judge McNulty knows that he,

individually or as a fiduciary, or his spouse residing in his household,

has a financial interest in the subject matter in controversy, and has

a direct financial interest in ensuring the economic advantage of the

defendants, an advantage that would be substantially affected by the outcome of the proceeding. The defendants lose the case, the publicity damages their reputation, their business and share price drop, and Judge McNulty's brother-in-law, K3 defendant Senator Charles Schumer, loses political donors, loses his position of power in the Democratic Party, and Judge McNulty becomes subject to impeachment.

3. **May 9, 2019: Letter from Patel/Kaul to Chief Judge Jose Linares of the United States District Court for the District of New Jersey**

**(P1 - D.E. 51 Page ID 956)** – Plaintiffs Patel and Kaul requested that Chief Judge Jose Linares disclose his financial holdings and conflicts of interest: **“We also request, with all due respect, that in light of your involvement in the cases, you disclose to us, the record and the Court, your financial disclosure statement and complete and comprehensive list of any and all conflicts of interest, past or present, that involve you and or any members of your family, to the third degree. We believe it to be a conflict of interest that your son, Jose L. Linares, is employed by the law firm of Walsh +**

**Pizzi + O'Reilly + Falanga, a law firm whose principal is married to the Clerk of the Court, William Walsh, and one that represents defendant Hackensack University Medical Center and Robert Garrett in K1 + K2. We respectfully request that the aforementioned information be provided by May 22, 2019 by the close of business in your court.”** The information was not

provided, and on May 16, 2019, Chief Judge Jose Linares, suddenly retired, and became a partner at a New Jersey law by the name of English + McCarter. This firm prevailed in every case it had placed before ex-Chief Judge Linares. Corrupt judges will, when threatened with exposure, retire from the bench to protect their pension and avoid disciplinary action, and its attendant reputational damage.

Judge Linares had been corrupted by the defendants, as evidenced by his failure to disclose his financial holdings, his conflicts of interest and his sudden retirement.

- 4. May 22, 2019: Memorandum and Order of Disqualification (K1 - D.E. 340 Page ID 8670)** – Judge McNulty became disqualified, and submitted an unusually lengthy defense of the charges levied against

**this position, and needless to say, he failed to submit the conflict and financial disclosure information.”** The information was not provided, because it proves that Judges McNulty and Linares had been bribed by the defendants.

**6. June 11, 2019: Letter from Patel/Kaul to Judge Martinotti (P2 –**

**D.E. 47 Page ID 821)** – On June 6, 2019 Patel/Kaul submitted a letter that detailed massive schemes of document forgery, committed by Defendant Allstate, in which they forced their medical directors, under threat of job termination, to falsify medical reports to deny care to injured clients (P1- D.E. 55 Page ID 980). The purpose of the scheme was to maximize corporate profits through the exploitation of the public. In this certification, Plaintiff Patel states, amongst other things, **“Dr. Gross, fearful of losing his only source of employment and being “black-balled” within the New Jersey healthcare community, reluctantly complied with these falsification instructions. Under duress, he began to sign false reports that issued blanket denials of care to severely injured patients, many of whom were unable to ambulate and or were**

**bed ridden.”** The certification regarding the felony of Evidence Tampering by Defendant Allstate, was posted to the court docket, and e-mailed to seventy-seven (77) lawyers, involved in K1 + K2 + K3 + K4 + P1 + P2. On Saturday June 8, 2019, Plaintiff Patel was contacted by a lawyer not connected with any of the lawsuits. He indicated he was counsel to a physician who had worked as a medical director for Defendant Allstate New Jersey Insurance Company, Dr. Teri Ramanan, but who had been terminated after refusing to sign fraudulent reports. This physician was subsequently indicted for health insurance fraud by the Office of the New Jersey Attorney General, but described the same schemes of evidence tampering, as detailed in Plaintiff Patel’s certification. Sometime between June 6, 2019 and June 10, 2019, Defendant Allstate New Jersey Insurance Company and or their agents threatened Dr. Gross that if he cooperated with Plaintiffs Patel and Kaul, they would cause to be accelerated, a lawsuit they had filed against him. Defendant Allstate coerced Gross into providing a false statement, **“The purpose of these retaliatory acts was to intimidate and harass Gross into**

**not providing any further information to Patel + Kaul or  
testifying on their behalf ... The criminal conduct identified in  
the affidavit is ongoing, and thousands of patients' lives are  
being put at immense risk every day ... This situation presents a  
public health crisis that requires emergent legal action ... we  
urge this Court to immediately grant our request for discovery**

...” (P2 – D.E. 47 Page ID 823). Despite evidence of pervasive criminal conduct, Judge Martinotti did not refer the matter for criminal investigation, because he had been bribed by the defendants. In this case, every thought, word and deed (orders/opinions/judgments) from every judge involved in its administration, is a direct result of the defendants’ scheme of bribery. Without the bribery, the case would have been lawfully adjudicated on the law and facts. Kaul has demonstrated the erroneousness of the opinions of both Judge McNulty (D.E. 300 – February 22, 2019) and Judge Martinotti (D.E. 385 – July 29, 2019). In many cases of judicial corruption, the judicial offenders can conceal their crimes, by submitting opinions that at least appear legally

legitimate, and are grounded in certain facts of the case. That is not the case here. The judges in this case, have so perverted the course of justice, as to leave no question that they were bribed.

**7. June 19, 2019: Case Summary (K1 – D.E. 377 Page ID 9279) –**

Upon request from Judge Martinotti, Kaul submitted a five-page case summary. It is noteworthy that although this document was requested of every defendant, less than five were submitted. Kaul, respectfully asserts that the defendants failure to comply with the Court's request, was consistent with, and evidence of their knowledge that Judge Martinotti had decided to administratively terminate Kaul's twenty-two (22) motions for summary judgment, and then dismiss the case, without adjudicating the summary judgment motions, the purpose of which was to constrict the grounds for appeal. Judge Martinotti and the defendants conspired to have the motions neither granted, nor denied, as the former would strip them of all of their assets and would provide the predicate for criminal proceedings, while the latter would be overturned at either the Third Circuit or the Supreme Court. The defendants did not



oppose the summary judgment motions. On June 19, 2019, Kaul sent to the Court, via Fedex, the original and two copies of the case summary. However, on August 8, 2019, Kaul noted that the first page had been omitted from the published document. On August 9, 2019, Kaul had hand delivered to the Court, a copy of the six-page document. On page 1, Kaul states, **“Judge McNulty erroneously dismissed with prejudice the following defendants: (i) Carmel + Moore + NASS + AMA (res judicata + entire controversy); (ii) State of NJ + NJBME (sovereign immunity); (iii) Solomon (absolute immunity) + (iv) Christie + Chiesa + Solomon + Roeder + Lomazow (sovereign + qualified), the purpose being to disempower Kaul’s case, by dissipating the thrust of the theme of political corruption. Judge McNulty concluded with: “Any amended complaint shall be filed within 30 days after the date of this order and opinion.” The purpose of this was to give the charade of due process.”** The charade was purposed to provide Judge McNulty cover for the schemes of bribery, and to make him appear impartial, in order to minimize the risk of reversal on appeal.

The omission of page 1 facilitated the concealment of the defendants/Court's strategy, to divert the case into a corrupted New Jersey state court, **“On February 22, 2019, Kaul's Second Amended Complaint was similarly culled by Judge McNulty (D.E. 300 Page ID 8171 + D.E. 301 Page ID 8218), when he dismissed with prejudice all federal-law claims, but yet dismissed without prejudice all state-law claims. The purpose of this was to continue the charade of due process, to keep the case away from the Third Circuit/Supreme Court, and have the matter “shunted into a corrupt New Jersey state court” (D.E. 313-1 Page ID 8445), most likely the Union County Court.”** The defendants/Court's three (3) year strategy to conceal its rampant corruption, consisted of providing Kaul the appearance of due process, but denying him, actual due process, in the belief, [and] hope, that he would **“pack his bags and leave”**. The event that dismantled this belief was the filing by Kaul, on February 11, 2019, of a motion for summary judgment against Defendant Allstate New Jersey Insurance Company (D.E. 299). Judge McNulty was then ordered by this defendant, one of his

principal bribers, to immediately ‘shut’ Kaul down in the United States District Court, and divert him and his case, into the bowels of the New Jersey state court system, a system corrupted and controlled by Defendant Allstate, all the way from the trial courts to the state supreme court. Kaul did not take the bait.

**8. June 27, 2019: Letter from Kaul to Chief Judge Freda Wolfson**

**(K1 – D.E. 383 Page ID 9292)** – Kaul requested that Chief Judge Freda Wolfson compel Judges Linares and McNulty to submit onto the court docket their AO 10A financial disclosure/conflict forms. Attached to the letter were copies of letters submitted by Patel/Kaul on May 9, 2019 and June 3, 2019, respectively addressed to ex-chief Judge Jose Linares and Chief Judge Freda Wolfson, that sought this information. It was not provided, and neither Patel nor Kaul, as propria persona plaintiffs, were directed to the Judicial Conference database. Kaul informed Chief Judge Freda Wolfson, **“I respectfully inform the Court that if the above requested information is not provided by 5pm EST on Monday July 1, 2019, I will move in the United States Court of Appeals for the Third Circuit for a writ of**

**mandamus, a copy of which will be filed with the United States Supreme Court. I shall also bring this issue to the attention of the President of the United States of America.”** The district court continued its scheme to conceal from Kaul and the public, its crimes of judicial corruption, and neither ordered the information be submitted onto the court docket, or issue a public denial that **“these jurists [McNulty + Linares] were bribed by the defendants in the above matters, as part of a series of quid pro quo schemes, in which Judges Linares and McNulty abused the authority of the United States District Court to obstruct my prosecution of the aforesaid cases.”**

9. **July 29, 2019: E-mail from Kaul to defendants re: Motion to Certify Order of June 26, 2019 for Interlocutory Review** – At 1:55

pm EST, Kaul e-mailed a copy of a motion for the district court to certify his application for interlocutory review of its order that administratively terminated Kaul’s twenty-two (22) motions for summary judgment (**Exhibit 1**). Kaul asserts that the defendants engaged in an improper and illegal ex-parte communication, in

which they forwarded a copy of the motion to the chambers of Judge Martinotti, which caused him to almost immediately enter his order of denial. The purpose was to foreclose Kaul from having his application adjudicated, and taking the matter to the Third Circuit Court of Appeals. This is similar to the pattern of misconduct, that occurred between February 11 and February 22, 2019, when Judge McNulty dismissed Kaul's case, after he filed a motion for summary judgment against Defendant Allstate New Jersey Insurance Company (D.E. 299). The reason is that Judges McNulty and Martinotti have been bribed by the defendants.

10. **July 29, 2019: Order denying Kaul's so-called motion for reconsideration (K1 – D.E. 385 Page ID 9336)** – The opinion/order entered by Judge Martinotti contains knowingly fraudulent statements, as evident in 'The Martinotti Misrepresentations'.

**(Exhibit 2)**

11. **July 30, 2019: Kaul Notice of Motion to certify for interlocutory appeal the question of whether the court erred in not granting Kaul's twenty-two (22) pending motions for**

**summary judgment against the defendants (K1 – D.E. 386 Page**

**ID 9338)** – Kaul filed this application in the court on July 30, 2019 at

12:09 pm, and asserted the following arguments: **(i)** The Order

involves a controlling question of law in which the disposition of the

motions for summary judgment is “**serious to the conduct of the**

**litigation either practically or legally**”; **(ii)** There is a substantial

ground for difference of opinion; **(iii)** An immediate appeal of the

order would materially advance the ultimate termination of this

litigation. Kaul raised the issue that further denials of his application

for medical licensure in other states would constitute “**new**

**racketeering injuries**”, that would provide ongoing bases for new

claims. Despite being aware of the magnitude of the

defendants/Court’s civil and criminal liability, the high probability of

decades long litigation and the cost to the federal judiciary, Judge

Martinotti, because he has been bribed by the defendants (admitted

on August 8, 2019), he administratively terminated Kaul’s twenty-

two (22) motions for summary judgment.

12. **July 31, 2019: Request for admission or denial of statements pertaining to the transmission/exchange of information/monies between Judge Martinotti and the defendants (K1 – D.E. 387 Page ID 9352)** – On August 8, 2019, Judge Martinotti caused to be admitted the twenty-seven (27) statements ,one of which, number 11, is, **“I understand that these improper ex-parte communications are part of a wider series of schemes (“schemes”) of bribery and corruption within the United States District Court for the District of New Jersey (“court”)”**.

13. **July 31, 2019 (K1 – D.E. 387)** - Judge Martinotti entered an order, to strike from the K1 docket, the **“Request for admission or denial of statements pertaining to judicial corruption within the United States District Court for the District of New Jersey”**.  
No reason was provided.

14. **August 1, 2019: Request for admission or denial of statements pertaining to judicial corruption within the United States District Court for the District of New Jersey** – On August 8,

2019, the judges caused to be admitted fourteen (14) statements, one of which, number 1, is, **“I understand that there [sic] schemes (“schemes”) of judicial bribery and corruption within the United States District Court for the District of New Jersey (“court”)”** – (Exhibit 3).

15. August 6, 2019 (K1 – D.E. 391) - Judge Martinotti entered an order, to strike from the K1 docket, the **“Request for admission or denial of statements pertaining to judicial corruption within the United States District Court for the District of New Jersey”**.

No reason was provided.

16. August 7, 2019 (K1 – D.E. 389) - Judge Martinotti entered an order, to strike from the K1 docket, the **“Request for admission or denial of statements pertaining to judicial corruption within the United States District Court for the District of New Jersey”**.

No reason was provided.

17. August 14, 2019 (K1 – D.E. 390) - Judge Martinotti entered an order, to strike from the K1 docket, the **“Request for admission or denial of statements pertaining to judicial corruption within**



**the United States District Court for the District of New Jersey”.**

No reason was provided.

18. **August 7, 2019: Request for admission or denial of statements pertaining to judicial corruption within the United States District Court for the District of New Jersey (K1 – D.E. 389 Page ID 9392)** – Of the twenty-two (22) letters sent, only one, that addressed to Judge Lois Goodman, was posted to the K1 docket.
19. **August 15, 2019: Order (K1 – D.E. 392)** – Judge Martinotti entered an order, to strike from the K1, K2, P1 and P2 dockets, the **“Request for admission or denial of statements pertaining to judicial corruption within the United States District Court for the District of New Jersey”**. No reason was provided.

### **Reasons For Granting The Writ**

- a. **Kaul respectfully asserts that the refusal of the district court judges to provide their financial holdings and conflicts of interest is because they have been corrupted and are conflicted. This corruption and conflicts of interest have caused the non-adjudication of motions, have obstructed Kaul’s prosecution of the case, have caused the entry of illegal orders, and a dismissal of the case.**

A writ of mandamus is properly granted to correct the “**usurpation of judicial power.**” In re Link-A-Media Devices Corp., 662 F.3d 1221, 1222 (Fed. Cir. 2011). Specific to this case, “**a lengthy delay in ruling on a request for relief can amount to a denial of the right to have that request meaningfully considered.**” In re Google, No. 15-138, 2015 WL 5294800, at \*1 (Fed. Cir. July 16, 2015). The obstruction of Kaul’s prosecution of K1 by the defendants/Court’s strategy of denying Kaul discovery, denying or delaying adjudication of his motions, entering illegal orders, that include an improper dismissal of the case, are because the defendants have bribed the district court judges. The defendants/district judges have converted the United States District Court into a racketeering enterprise, in which they have engaged in a “**pattern of racketeering**” in the commission of the predicate acts of bribery, mail fraud, wire fraud. This “**pattern of racketeering**” has violated, and continues to violate, Kaul’s constitutional right to due process and an impartial tribunal, and thus unless a writ of granted, the violations will continue. A writ, issued immediately, will provide a remedy to the ongoing harm caused to Kaul by

the defendants/district judges ongoing criminal activity. No other avenue of recourse is available to Kaul, not the appellate process, because it will permit a continuance of the crime, the commission of irreparable injury to Kaul, and a furtherance of the obstruction of justice, to which Kaul has most recently been subjected, since the commencement of the case, on February 22, 2016. The overall scheme of obstruction commenced in 2012 and has been perpetrated through the administrative, state and federal courts within the geographic boundaries of the State of New Jersey. Kaul will face substantial and irreparable prejudice if the writ is not immediately issued.

**b. Kaul respectfully asserts that the law finds that a Writ of Mandamus is a legitimate legal instrument to effectuate the interests of justice, when a district judge/s admits to having engaged in bribery/ex parte communications, but refuses to submit his/her financial disclosures/conflicts of interest**

As pled above, the facts prove that the district judges are conflicted, have either participated in schemes of bribery or have knowledge regarding these schemes. The letters containing these facts were stricken from the record by Judge Martinotti on August 15, 2019 (D.E. 392), with the

intention and indeed effect, of preventing the issue of judicial corruption being reviewed by the Third Circuit Federal Court of Appeals or the United States Supreme Court. Thus, a writ of mandamus is the only avenue available to Kaul to have fully exposed the conflicts and corruption, in a timely manner, that will permit reversal of the district court's illegal orders. A writ of mandamus is warranted when a court either exceeds or fails to exercise its authority, and is purposed: "to confine an inferior court to a lawful exercise of its prescribed jurisdiction or to compel it to exercise its authority when it is its duty to do so." Roche v. Evaporated Milk Association, 319 U.S. 21, 26, 63 S.Ct. 938, 941, 87 L.Ed. 1185 (1943).

- c. **Kaul respectfully asserts that certain district court judges have either failed to file forms AO10, and or submitted inaccurate information in violation of 5 U.S.C. app. § 104, thus precluding Kaul from fully ascertaining their financial holdings and conflicts of interest.**

As pled above, Kaul's attempts to gather information regarding the financial holdings and conflicts of interest of the district court judges have been unsuccessful. The exhaustion of these avenues thus warrants a grant of Kaul's petition for a writ of mandamus. The court's seeming

recalcitrance, is consistent with its overarching scheme to obstruct Kaul's prosecution of K1 + K2 + K3 + K4, is contrary to the interests of justice . A writ of mandamus is warranted when a court either exceeds or fails to exercise its authority, and is purposed: "to confine an inferior court to a lawful exercise of its prescribed jurisdiction or to compel it to exercise its authority when it is its duty to do so." Roche v. Evaporated Milk Association, 319 U.S. 21, 26, 63 S.Ct. 938, 941, 87 L.Ed. 1185 (1943). The district court judges have ignored Kaul's pleas for the disclosure of their financial holdings and conflicts of interest. A writ of mandamus is warranted when, without cause and in a manner that is arbitrary, district court judges, as is the case here, choose not to provide their financial holdings and conflicts of interest. See In re: School Asbestos Litigation, 977 F.2d 764 (1192) at 792. The district court has willfully neglected its duty in the proper administration of its lawful authority, by abdicating its legal obligation, pursuant to 5 U.S.C. § 104 to disclose its financial holdings and conflicts of interest. The malfeasance in which the district court is engaging is engaging is an intentional 'error', calculated to obstruct Kaul's prosecution of K1 + K2 + K3 + K4, a calculation made in the

context of the defendants/Court's abuse of Kaul's propria persona status, and what Kaul respectfully asserts is the defendants/Court's opinion as to Kaul's ignorance of the law. The district court judges know that the law demands they must annually and truthfully disclose their financial holdings and conflicts of interest to the public, but they have ignored both the law, and Kaul's plea. Kaul has been left with no option but to file this writ of mandamus: See Communication Workers of America, AFL-CIO v. American Tel. & Tel. Co., 932 F.2d 199 210 (3d Cir. 1991)., the present claims are different in kind ... the error ... is entirely avoidable. Moreover, review after final judgment cannot force a district judge to adjudicate, and interlocutory appeal is unlikely to be available ... as required for a certification under 28 U.S.C. § 1292(b). See also Edwards v. Cass County, 919 F.2d 273, 276 (5<sup>th</sup> Cir. 1990)"

- d. Kaul respectfully requests that this Court emergently grant Kaul's petition for a writ of mandamus, that Kaul asserts will (i) prove the district court judges are conflicted and corrupted; (ii) prove that their orders are illegal, which will; (iii) mandate the illegal orders be made NULL AND VOID and that all Kaul related cases be TRANSFERRED OUT of the District of New Jersey and; (iv) mandate the entry of summary judgment against all defendants**

The defendants/district court have admitted that K1 is a **“big”** case: “RICO cases, like the antitrust cases discussed in Twombly, “are ‘big’ cases and the defendant should not be put to the expense of big-case discovery on the basis of a threadbare claim.” In re Ins. Brokerage Antitrust Litig., 618 F.3d 300, 370 (3d Cir. 2010)” (D.E. 300 Page ID 8201). Kaul addressed the this mischaracterization of his claim in ‘The McNulty Analysis’ (D.E. 313-1 Page ID 8435 to Page ID 8436): “... **“big” cases ... threadbare claims ...** **Kaul respectfully asserts that Judge McNulty’s conflicted position, in his prior capacity as a lawyer, having represented two of the defendants Washburn and NJMG, and being the brother-in-law of US Senator Charles Schumer, who received ‘campaign donations’ from Allstate + Geico during the pendency of the case, are factors that might explain why his opinion bears no resemblance to the evidence.”** (D.E. 313-1 Page ID 8436). K1, K2, K3, K4, P1 and P2 are interminably intertwined, and judgements/rulings in any one case, affect all others. The defendants/Court’s **“big”** admission argues in favor of promptly adjudicating appeals, such as Kaul’s K4 appeal of the dismissal by

the bankruptcy court of the adversarial action against Defendant Stolz.

The eight (8) month delay in the K4 appeal further evidences the corruption within the District of New Jersey. The larger and more complex the case, the more consistent with the law is the practice of prompt and timely adjudication of appeals: **“These [case management issues] are compounded in complex cases such as this. See Manual for Complex Litigation, Second § 21.34 (“[T]he judge at the initial conference (and at later conferences as appropriate should attempt to ascertain what issues are or may become appropriate for summary judgment and establish, at least tentatively, a schedule for filing and submitting such motions.”); Charles Alan Wright, Arthur R. Miller, and Mary Kay Miller Kane, 6A Federal Practice and Procedures § 1530 at 303-04 (“The general concern over protracted litigation led to increased pressure for the development of regularized procedures to be employed in every ‘big case’”). In re: School Asbestos Litigation, 977 F.2d 764 (1192) at 794**

- e. **Kaul respectfully requests that this Court grant his petition for a writ of mandamus as it will not impinge on the district court’s**



**inherent case management authority, but will mitigate the defendants/district court's obstruction of Kaul's prosecution of the case**

Since the commencement of K1 + K2 + K3 + K4, the district court has failed to establish any deadlines with regards to discovery or motions for summary judgment, facts that Kaul respectfully assert evidence the conflicted and corrupted state-of-mind of the district court judges. The district court has willfully failed to properly exercise its adjudicating authority, with regards to Kaul's K4 appeal. It has failed to have the US Marshals serve the summons and complaint in K3. For a period of forty-two (42) months it denied Kaul any discovery in K1 for and in that regard cannot be afforded the deference that would follow had it established a timeline for such applications: **“District courts are entitled to broad deference regarding timeliness restrictions, but they are entitled to that deference only if they state those deadlines explicitly.”** In re: School Asbestos Litigation, 977 F.2d 764 (1192) at 794. The district court has knowingly and intentionally deviated from the law: **“But whereas it is inevitable that judges will make mistakes from time to time when ruling on summary judgment motions, the error of refusing to rule**

**on the merits of such a motion is entirely avoidable.”** In re: School Asbestos Litigation, 977 F.2d 764 (1192) at 793. The non-adjudication in K1 of Kaul’s twenty-two (22) motions for summary judgment, the denial of his requests for discovery, the denial of his motion for default judgment against Defendant Stein, the striking from the record of Kaul’s letters to the district court judges requesting their financial disclosures and conflicts of interest, and the overall obstruction of his prosecution of K1, K2, K3 and K4 occurred, because the district court judges are conflicted and have been corrupted by the defendants. A grant of Kaul’s petition will cause the district court judges to become compliant with U.S.C. app. § 104., and might expose prior conflicts of interest/acts of judicial corruption that caused the incarceration of innocent people.

**f. Kaul respectfully assert that his application for a writ of mandamus satisfies the “three conditions” set forth by the United States Supreme Court**

This Court, pursuant to the All Writs Act, which authorizes that “[t]he **Supreme Court and all courts established by Act of Congress may issue all writs necessary or appropriate in aid of their respective**

**jurisdictions and agreeable to the usages and principles of law.”** 28

U.S.C. § 1651(a)” has the authority to adjudicate Kaul’s appeal. The requisite “**three conditions**” that must be satisfied before the issuance of such an order pursuant to § 1651(a) in aid of its jurisdiction are: “**(1)** “no other adequate means” to attain the relief sought, and **(2)** a right to the writ that is “clear and indisputable,” and, **(3)** even if these first two conditions are met, the reviewing court in its discretion must conclude that the writ “is appropriate under the circumstances.” *Cheney v. Dist. Court for Dist. Of Columbia*, 542 U.S. 367, 380-81, 124 S.Ct. 2576, 159 L.Ed.2d 459 (2004).” See *In re: Briscoe*, 448 F.3d 201 (2006) at 212. Kaul has satisfied the first condition. Kaul’s plea to the district court judges to disclose their financial holdings and conflicts of interest has been ignored. Kaul’s plea to the Committee on Financial Disclosure has been ignored, and thus Kaul, without a grant of a writ of mandamus, has no basis for an interlocutory appeal or indeed any appeal, based on the district court judges conflicts of interest and crimes of public corruption. It is the strategy of the defendants/Court to leave Kaul in ‘legal limbo’ with regards to the appeal, in order to obstruct his prosecution of the case. However, if

this Court were to grant Kaul's petition, it would further the interests of justice. Similarly, if the district court judges were ordered to disclose their financial holdings and conflicts of interest, it would reduce, if not eliminate, the risk of future occurrence of such acts of judicial corruption. And finally, if this Court were to grant Kaul's application, it would enhance the public's faith in the federal judiciary. The district court judges' refusal to disclose their financial holdings and conflicts of interest, continue to cause ongoing violations of Kaul's constitutionally protected right to due process and an impartial tribunal. Kaul has satisfied the second condition, in that the district court has "committed a 'clear error of law' at least approaching the magnitude of an unauthorized exercise of judicial power, or a failure to use that power when there is a duty to do so." In re Federal-Mogul Global, Inc., 300 F.3d 368, 384 (3d Cir. 2002). Kaul respectfully asserts that the third condition, pursuant to the law of this Court and that of the Supreme Court, has been satisfied. Kaul will be irreparably injured if the district court judges are not ordered to disclose their financial holdings and conflicts of interest.

## Conclusion

This Court should direct the district court judges to immediately disclose their financial holdings and conflicts of interest for the following reasons:

**(i)** Kaul will be irreparably prejudiced with regards to any appeal to the Third Circuit , if the district court judges fail to disclose their financial holdings and conflicts of interest; **(ii)** Kaul will be irreparably prejudiced with regards to his prosecution of the case/appeal, if the district court judges are not ordered to disclose their financial holdings and conflicts of interest; **(iii)** mandamus is appropriate because Kaul's constitutionally protected right to due process, and an impartial tribunal will be violated if the district court judges are not ordered to disclose their financial holdings and conflicts of interest; **(iv)** it is within this Court's discretion to issue a writ directing the district court judges to disclose their financial holdings and conflicts of interest; **(v)** the district court judges are conflicted for the reasons set forth above, and are thus motivated to not disclose their financial holdings and conflicts of interest, in the knowledge that disclosure will cause them to incur civil and criminal liability

For the above stated reasons, Kaul respectfully moves this Court to immediately order the district court judges to disclose their financial holdings and conflicts of interest.

I, Richard Arjun Kaul, MD, the Petitioner, do hereby certify that the above statements are true and accurate to the best of my knowledge, and that if it proved that I willfully and knowingly misrepresented the facts, then I am subject to punishment.

Respectfully submitted:

Dated: August 19, 2019

*R.Kaul*

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Richard Arjun Kaul, MD

cc: All Counsel of record via e-mail

All parties of interest: K1 + K2 + K3 + K4 + P1 + P2

Judge Freda Wolfson via hand-delivery

Judge Brian R. Martinotti via hand-delivery

Clerk of the Court via hand-delivery

# Exhibit 1



Richard Kaul <drrichardkaul@gmail.com>

**Kaul v Christie: 16-CV-02364 - K1**

3 messages

**Richard Kaul**

<drrichardkaul@gmail.com>

To: mhaefner@thewalshfirm.com

Cc: daniel.vanella@dol.lps.state.nj.us, Robert McGuire <Robert.mcGuire@law.njoag.gov>, Shana Bellin <Shana.Bellin@dol.lps.state.nj.us>, djd@saiber.com, Gene Kang <gene.kang@rivkin.com>, William Marshall <wmarshall@zeklaw.com>, "Edward G. Sponzilli, Esq." <egsponzilli@nmmlaw.com>, Erdal Turnacioglu <eturnacioglu@wglaw.com>, "Marisa R. Kussoy" <mkussoy@wglaw.com>, saundesb@uhnj.org, trichards@winnebanta.com, Paul Miller <PMiller@decotiislaw.com>, Stew Leviss <sleviss@blkgg.com>, "Chipko, Michael" <michael.chipko@wilsonelser.com>, Ken Merber <kmerber@gvlaw.com>, "Cafferty, Thomas J." <tcafferty@gibbonslaw.com>, lwalsh@thewalshfirm.com, "Kenneth M. Brown" <kbrown@wglaw.com>, Jeffrey Noonan <jnoonan@pomeroyhellerley.com>, rm@malagierelaw.com, ekatz@mstkf.net, Jeffrey Randolph <jrandolph@jrlaw.net>, amccourt@bracheichler.com, Barry Levy <Barry.Levy@rivkin.com>, "Brian L. Bank" <Brian.Bank@rivkin.com>, Isabel Lupo <Isabel.Lupo@rivkin.com>, Joshua Smith <Joshua.Smith@rivkin.com>, Liza Gilmartin <Liza.Gilmartin@rivkin.com>, Max Gershenoff <Max.Gershenoff@rivkin.com>, goodwirp@uhnj.org, sperna@milbermakris.com, "Richard P. Kaye" <rkaye@egsllp.com>, Joanna Cohen <jcohen@egsllp.com>, "Lowy, Nomi I." <NLowy@gibbonslaw.com>, jennifer@fourtheditioninc.com, Joseph Linares <JLinares@walsh.law>, jsuh@wglaw.com, kheller@pomeroyhellerley.com, "James-Weir, Lauren" <LJames-Weir@gibbonslaw.com>, "Geri L. Albin" <GAlbin@saiber.com>, Richard Wegryn <richard.wegryn@law.njoag.gov>, Jeffrey Posta <Jeffrey.Posta@law.njoag.gov>, HARSHAD PATEL <harshadpatel01111@gmail.com>, Todd Schwartz <tschwartz@pringle-quinn.com>, Jeff Quinn <jeffquinn@pringle-quinn.com>, Glen Sproviero <gsproviero@egsllp.com>, Scott Rever <srever@wjslaw.com>

Dear Mr. Haefner + Counsel,

Please find attached the following document:

- 1. Motion to Certify Order of June 26, 2019 for Interlocutory Review: July 29, 2019.

Regards,

Richard Arjun Kaul, MD

www.drrichardkaul.com



**190729-Kaul v Christie-K1-Motion to Certify Order for Interlocutory Appeal.pdf**

6749K

**Mail Delivery Subsystem** <mailer-daemon@googlemail.com>

Mon, Jul 29, 2019 at 10:53 AM

To: drrichardkaul@gmail.com



## **Exhibit 2**

## The Martinotti Misrepresentations

On July 29, 2019, Judge Martinotti entered an order/opinion (D.E. 385 Page ID 9330) based on argument provided by Kaul and the defendants, on June 26, 2019, with regards to 'The McNulty Analysis' (D.E. 313-1 Page ID 8384), a document incorrectly deemed a motion for reconsideration. Within the below information, is evidence that proves Judge Martinotti knowingly misrepresented critical segments of Kaul's testimony:

1. Martinotti: D.E. 385 Page ID 9330: Page 1 Para. 2 – **“Richard A. Kaul, an anesthesiologist by training, performed minimally invasive spine surgeries”**

Kaul: Kaul is a minimally invasive spine surgeon whose training included anesthesiology:

- (i) **(aa)“Q. What parts of Dr. Kaul’s CV, experience, background, training or skills allow you to testify as an expert that he is above average with regard to his ability and proficiency to perform minimally invasive procedures in the last ten years? A. The critical thing that stands out is to understand the Rule of Five, which is ... Superimposed on that is my regard for the fact that he had at a minimum four years of surgical education; he is a surgeon, end of story.”** (K1 – D.E. 225-1 Page ID 5116) – Expert testimony of Professor Solomon Kamson (NJ OAL DOCKET No. BDS 08959-2012 on June 18, 2013).
- (ii) **“Dr. Kaul has completed adequate training that has allowed him to extend his practice to include minimally invasive spinal surgery. He has demonstrated his proficiency by performing hundreds of successful minimally invasive spinal surgeries over the years.”** K1 – D.E. 179 Page ID 2417) – Expert report of Dr. Steven Levine (Maze v Kaul: Docket No. PAS-L-2473-11).
- (iii) **“CURRICULUM VITAE RICHARD KAUL, MD”** (K1 – D.E. 179 Page ID 2389) – Demonstrates that Kaul’s training in minimally invasive spine surgery commenced in 2002, continued in 2012, and involved both teaching and participating in almost eighty hands-on-cadaver and live patient courses, in both the United States and internationally.
- (iv) **Kaul’s clinical outcomes (K1 – D.E. 179-2 Page ID 3074) – “Had actually performed 800 minimally invasive spinal discectomies and fusions from 2002 to 2012, with good to very good outcomes in 90-95% of cases (average 65%) and complication rate of 0.1% (average 5-15%).”**

2. Martinotti: D.E. 385 Page ID 9330: Page 1 Para. 2 – **“In March of 2014, the New Jersey State Board of Medical Examiners revoked his medical license (ECF No. 301 at 1). They found Kaul’s execution of spine surgeries on eleven patients without proper training and experience constituted “gross and repeated malpractice, negligence, and incompetence.”**

Kaul: The following evidence, that the defendants have not contested/rebutted/addressed proves that the revocation was a procured through bribery and fraud, and is the product of a massive state orchestrated crime. Judge Martinotti has implicated himself and the district court in the perpetuation/aiding and abetting of this crime, by using the US mail and wires to

propagate knowingly false information in furtherance of the defendants' racketeering scheme. Judge Martinotti is motivated to participate in the defendants criminal scheme, because the defendants have bribed him (K1 – D.E. 387 Page ID 9352): (i) 'The Solomon Critique' (K1 -D.E. 225 Page ID 5271) – **"The medical board knew that their actions were illegal, and despite having received a letter from me, dated February 6, 2014, in which I alerted them to the malfeasant conduct of their expert, Andrew Kaufman and senior medical board member, Steven Lomazow, they continued with their fraud ... because they knew that they had behaved illegally in the administrative proceedings, and that Noerr-Pennington is no defense to acts of criminality."** (K1 – D.E. 225 Page ID 5272); (ii) 'The Waldman E-Mail' (K1 -D.E. 299-1 Page ID 7072) – **"First of all I want to tell that I feel really awful that the Neurosurgeons and Medical Board have attacked you professionally and personally. Revolutionaries often are met with great resistance even when they are trying to do great and beneficial things. I'm sorry that the fascists in the Medical Board and state government have pulled your license. They are bullies and clearly politically motivated.";** (iii) 'The Sabo Certification' (K1 - D.E. 299-4 Page ID 7108) – **"(a) Ms. Hafner requested that I testify against Dr. Kaul – I refused, and explained to her that I held Dr. Kaul in the highest regard, that he had reduced my pain, and improved the quality of my life. I told her that I believed his surgery had been successful, and that I was very disappointed when he left. (b) ... I explained that I decided to consult with Dr. Kaul after having seen his interview with Derek DaSilva on Channel 12 News, and was very impressed with how he helped a sixteen-year old gymnast return to gymnastics. I told her that I found Dr. Kaul to be very forthright, an opinion that I heard from many of his patients." (c) ... I told her that everybody I spoke to about Dr. Kaul described him as phenomenal." (d) ... I told her that I had heard nothing but good things from other patients about Dr. Kaul.";** (iv) 'The Zerbini Certification' (K1 - D.E. 299-5 Page ID 7111) – **"I believe that Hafner lied to me about Dr. Kaul, and about wanting to help me with my lawsuit, to make sure that I testified against Dr. Kaul. She told me that if I testified against Dr. Kaul, it would help me with my lawsuit, "especially of Dr. Kaul has been stripped of his license to practice medicine". Hafner also told me that because Dr. Kaufman was a pain management expert for the state, it would help my case. I feel that Hafner exploited my situation to serve her own purpose, which was to take away Dr. Kaul's livelihood and destroy his reputation.";** (v) 'The Calabrese Certification' (K1 – D.E. 299-6 Page ID 7121) – **"I ascertained that a group of doctors and politicians conspired and colluded to have Dr. Kaul's license revoked. I had witnessed on a number of occasions, while waiting in Dr. Kaul's office reception area, conversations between other patients, in which they described how other physicians regularly slandered Dr. Kaul ... In approximately May/June 2012 my brother related to me a conversation he had with his acquaintance, during which the acquaintance made the following comment in regard to the suspension of Dr. Kaul's license: "I think it is terrible what they are doing to Dr. Kaul.";** (vi) 'The Przybylski Disciplinary Notice' (K1 – D.E. 299-7 Page ID 7125) – **"The Board of Directors concluded that Dr. Przybylski of Edison, NJ, violated Section A.1 of the AANS Rules for Neurosurgical Medical/Legal Expert Opinion Services by demonstrating improper advocacy when he testified ...";** (vii) 'The Feldman Certification' (K1 – D.E. 299-9 Page ID 7138) – **"... Dr. Yeung to make the following statement to a group of approximately five (5) physicians: "There is a doctor in New Jersey, Richard Kaul, who is performing fusions, but they are going to get him ... Dr. Kaul, like myself, was a victim of professional jealousy, that manifested itself**

through a corrupt medical board, that like many in the United States, flagrantly violate the due process rights of physicians.”; (viii) ‘The Yeung E-Mail’ (K1 – D.E. 299-10 Page ID 7155) – “Kaul: Could you please provide the names of individuals that you referenced in the conversation described in the Certification of Dr. Arnold E. Feldman ... Yeung: I was only aware of the ex-president of NASS, Dr. P, who testified against you in a New Jersey court ...”; (ix) ‘The Albin Letter’ (K1 – D.E. 299-16 Page ID 7194) – “The specific and massive fraud was committed during the administrative board proceedings (April 9, 2013 to December 13, 2013) in the matter of OAL Docket No. BDS 08959-2012N, and resulted in the illegal revocation of my license on March 12, 2014. Under a separate filing (Kaul v NJBME – Writ of Mandamus re: Reinstatement of New Jersey License: 25MA06328100) is enclosed a detailed analysis of the fraud entitled ‘The Solomon Critique 2’. This document proves that in a period from April 9, 2013 to December 13, 2013, K2 defendants, Jay Howard Solomon + Doreen Annette Hafner and K1/K2 defendant, Gregory Przybylski, MD, collectively committed two hundred and twenty-two (222) separate instances of perjury and evidential omissions + misrepresentations + falsifications + fabrications.”; (x) ‘The Solomon Critique 2’ (K1 – D.E. 299-18 Page ID 7203) – “The administrative board proceeding involved testimony from twenty-eight witnesses, and Kaul has identified how K2 defendants Hafner + Solomon committed the same illegal pattern of Evidence Tampering with the testimony of all witnesses, including Przybylski ... Przybylski perjured himself to manufacture evidence that supported Hafner’s case. And undermined Kaul’s case, and in other instances Solomon fabricated evidence when none existed to support Hafner’s case.”.

3. Martinotti: D.E. 385 Page ID 9330 Page 1 Footnote 1 – “However, as will be addressed below, at a status conference held by the Court, Kaul admitted that this Motion for Reconsideration was pending.” – False

Kaul: Kaul did not admit that ‘The McNulty Analysis’ was a pending motion for reconsideration. The exchange with the district court is as follows: “**THE COURT: So there’s a motion, I’m going to say, addressing the McNulty analysis which dismissed the federal claims. Is that a fair way to say that? MR. KAUL: I would say it’s a response to the McNulty analysis.**” (Transcript June 26, 2019: Page 10 Line 16 to Line 20).

4. Martinotti: D.E. 385 Page ID 9332 Page 3 Para. 2 – “On March 18, 2019, Kaul filed a letter of reconsideration to reverse the Order dismissing his Second Amended Complaint ... Stein ... Ethics Committee” – False

Kaul: D.E. 313-1 Page ID 8385 Page 1 Para. 1 – “Dear Judge McNulty: Please find submitted, for no reason other than to demonstrate the incorrectness and errors of the above opinions. In the preparation of this document, which demonstrates that your opinion is wrong, I (“Kaul”) have cross referenced your opinions with the entire case docket, in order to identify errors of fact.” The word “reconsideration” appears nowhere in these documents (D.E. 313 + 313-1 + 313-2) and Kaul intended it to be absent, because they are not a motion for reconsideration. The defendants/Court have misrepresented the fact that ‘The McNulty Analysis’ is not a motion for reconsideration, and have misrepresented the fact that Kaul did not admit it was a motion for reconsideration. The district court has perverted the course of justice, because the defendants have bribed the judges ---, including Judges McNulty, Martinotti and Linares.

Martinotti: D.E. 385 Page ID 9332 Page 3 Footnote 3 – **“Upon termination of the twenty-two motions for summary judgment, the Court confirmed that Kaul’s Motion for Reconsideration was the only motion before the Court. (See id.) Defendants and Kaul agreed.”** – False Kaul: Kaul did not admit/agree that ‘The McNulty Analysis’ was a pending motion for reconsideration. The exchange with the district court is as follows: **“THE COURT: So there’s a motion, I’m going to say, addressing the McNulty analysis which dismissed the federal claims. Is that a fair way to say that? MR. KAUL: I would say it’s a response to the McNulty analysis.”** (Transcript June 26, 2019: Page 10 Line 16 to Line 20). Judge McNulty categorized it as a motion for reconsideration, because he wanted to manufacture a method for the defendants to submit a response to ‘The McNulty Analysis’, in order to mitigate the immense risk of reversal by either the Third Circuit or the Supreme Court. However, and as the law states, **“Such motions are not to be used as an opportunity to relitigate the case; rather, they may be used only to correct manifest errors of law or fact or to present newly discovered evidence.”** See Blystone v Horn, 664 F.3d 397, 415 (3d Cir. 2011) (D.E. 385 Page 9334). Judge Martinotti, in citing to this case, makes the case for Kaul. The order entered on April 5, 2019 by Judge McNulty (D.E. 325 Page ID 8479) permitted the defendants to relitigate the case, **“Defendants are permitted to file an omnibus opposition brief as to the issues identified in this Court’s Text Order of March 25, 2019 (D.E. 316) ...”** This order thus prohibited the district court from labelling ‘The McNulty Analysis’ a motion for reconsideration, as Local Rule 7.1(i) does not permit the filing of a response to a motion for reconsideration, and thus the premise of Judge Martinotti’s legal analysis is false, ergo the conclusion is wrong. However, even if one assumes that ‘The McNulty Analysis’ was a motion for reconsideration, Kaul submitted argument on May 21, 2019, not refuted/rebutted/addressed by the defendants/Court, that demonstrates the **“enormous volume of judicial error/omission/oversight/fraud/any reason of injustice/fraud on the court...”** (D.E. 341 Page ID 8675 to 8706). The defendants did not contest these facts, despite being permitted to do, pursuant to Local Rule 7.1(d)(3) (D.E. 341 Page ID 8677), and neither did Judge Martinotti, in his erroneous opinion of July 29, 2019, submit evidence, fact, law or argument to demonstrate that Kaul’s RESPONSE TO DEFENDANTS OPPOSITION TO ‘The McNulty Analysis’ was anything, but correct. Thus, the law, as cited to by Judge Martinotti, mandates that Judge McNulty’s opinions/orders of dismissal (D.E. 300 Page ID 8171 + D.E. 301 Page ID 8218 + D.E. 303 Page ID 8220 + D.E. 304 Page ID 8288) be reversed, and that all of his previous orders be made null + void, because, since the commencement of the case, he received bribes from the defendants. Judge Martinotti did not follow this course of action, because he too, received bribes from the defendants (D.E. 387 Page ID 9352). These are some of the reasons Kaul argued that he would not receive **“substantive justice”** in New Jersey. These offenders must be jailed. Crooks on the bench.

5. Martinotti: D.E. 385 Page ID 9333 Page 4 Para. 1 – **“Now, Kaul moves for reconsideration ... he points to examples of where he claims this Court has previously not included the precise verbiage or specific content provided in his own filings with the Court. (id. at 11-12, 16-17, 26, 52-62.). He also points to videos that allegedly “demonstrate his irrefutably competent performance.”<sup>4</sup> (Id. at 14 and 54).”** –

Kaul: Judge Martinotti may not have realized it, but his selective recitation of Kaul's RESPONSE TO DEFENDANTS OPPOSITION TO 'The McNulty Analysis' (D.E. 341 Page ID 8675), is further proof of the district court's "**unquestionably prejudiced**" state-of-mind, one that exists because the District of New Jersey, and its judges, have been thoroughly corrupted by the defendants (D.E. 389 Page ID 9392). The thirty-two (32) page document references seventy-seven (77) instances of legal error, **fraud on the court (34 instances)**, omission and oversight. Judge Martinotti, as with Judge McNulty, ignored the facts, misrepresented the law, and manufactured a false basis for dismissal, because they received bribes from the defendants. Throughout this entire charade of justice (February 22, 2016 to July 29, 2019) neither the defendants nor the court have rebutted/contested/refuted/addressed the conclusive evidence submitted by Kaul in support of his twenty-two (22) motions for summary judgment.

6. Martinotti: D.E. 385 Page ID 9333 Page 4 Para. 2 – "**Kaul further alleges this Court, knowingly and unknowingly, based decisions on instances of fraud (Id. at 41).**"

Kaul: Identified on D.E. 341 at Page ID 8684 at Para. 41 is a reference to D.E. 313-1 at Page ID 8411 at Para. 62, "**Kaul: D.E. 231 Page 5292 to 5542 – February 22, 2018: Kaul ... undermined the Court's repeated assertions ... June 30, 2017 order.**" Neither the defendants nor Judge Martinotti have contested/rebutted/refuted/addressed this evidence of the court's obstruction of Kaul's prosecution of the case, and its dilatory tactics to have Kaul "**pack his bags and leave**".

7. Martinotti: D.E. 385 Page ID 9333 Page 4 Para. 2 – "**He alleges the New Jersey Medical Board "serves only the political and economic agendas" of Defendants Allstate and Geico, that his license was illegally terminated (id. at 14-15) ... weaken the thrust of the Kaul's case (id. at 16) ... Stein ... not supported by the facts or law. (Id at 42, 44-45, and 56) ... particularly the Court's denial of discovery. (Id at 20-28, 34-38, 41-43, and 56) ... ex-parte communications ... legal standard for a motion to dismiss was applied incorrectly. (Id at 47-49, 50-62).**"

Kaul: Identified on D.E. 341 at Page ID 8681 at Para. 14-15 are references to D.E. 313-1 at Page ID 8401 at Para. 25 and Page ID 8404 at Para. 29. The premise of the case that caused the "**illegal revocation of Kaul's license**" (K1 – D.E. 313-1 Page ID 8402) was that Kaul was allegedly not competent to perform minimally invasive spine surgery. The defendants knew this was a false premise, and the videos evidence the falsity of this premise, "**The video is directly related to the latter point [Kaul's competency/patient outcomes in the practice of minimally invasive spine surgery], and is evidence that undermines the fraudulent case that caused the illegal revocation of Kaul's license.**". The case itself was conducted illegally (K1 – D.E. 225 Page ID 5271 + D.E. 299-18 Page ID 7202), and Judge McNulty disqualified himself, not out of "**caution**" (D.E. 340 Page ID 8673), but because he knew Kaul had caught him having engaged in "**fraud and obstruction committed by this Court**", having engaged in "**ex-parte communications**" and that he had willfully and knowingly "**applied incorrectly**" the legal standard for a motion to dismiss. Judge McNulty did not deny that he received bribes from the defendants, and Judge Martinotti avoided any reference to Judge McNulty's defense (D.E. 340 Page ID 8672) to the charges leveled in Kaul's motion for judicial disqualification of Judge Kevin McNulty + Transfer of cases to the United States District Court for the Southern District of New York (D.E. 334 Page ID 8591), that include inter alia, "**Judge McNulty is the brother-in-law of US Senator, Charles Schumer. From the commencement of the case on February 22, 2016 to its improper**

dismissal on February 25, 2019, Senator Schumer has received substantial ‘political campaign donations from defendants Allstate New Jersey Insurance Company and Geico (D.E. 313-1 Page ID 8418). These monies were ‘donated’ to Senator Schumer, in order that he exploit his relationship with his brother-in-law in order to pervert the course of justice and influence the outcome of the case. On March 7, 2019 Kaul sent a letter to Senator Schumer, that requested he confirm or deny if he or his agents had engaged in any communications with any of the defendants or their agents, pertaining to K1+ K2” (D.E. 334 Page ID 8597 Para. 10). Defendant Schumer failed to respond.” Judge Martinotti states, “He also contends the legal standard for a motion to dismiss was applied incorrectly. (Id. at 47-49, 50-62).” Judge Martinotti’s truncation of the facts asserted by Kaul are a consequence of his having participated in schemes of bribery, corruption and ex-parte communications (admitted on August 8, 2019 - K1 – D.E. 387 Page ID 9353). At D.E. 341 Page ID 8684/Para. 47 to 49 are referenced facts asserted on D.E. 313-1 Page ID 8413/Para 71 to Page ID 8418/Para 73 on D.E. 313-1. These facts assert more than just an erroneous application of a legal standard. They prove an illegal three-year racketeering scheme, committed by Judge McNulty and the defendants, that involved obstruction of justice, ‘Fraud on the Court’, and in which the United States District Court for the District of New Jersey was converted into a racketeering enterprise. This is akin to calling a decapitation, nothing but a little scratch on the neck. At D.E. 341 Page ID 8685/Para. 50 to Page ID 8687/Para. 62 are referenced, facts asserted on D.E. 313-1 from Page ID 8419/Para. 78 to Page ID 8432/Para. 122. These facts evidence not just a “legal standard ... applied incorrectly” but a massive conglomeration of intentional legal/factual error, omission and fraud. For example, “**Judge McNulty’s excuses for not entering default judgment (prolix SAC + lack of prejudice to Kaul + lack of willful misconduct by Stein) are not supported by the facts or law. This decision is clearly wrong.**” (D.E. 313-1 Page 8425/Para. 105). Judge Martinotti’s dishonest recitation of these facts is rooted in the schemes of bribery, the participation in which he has admitted.

8. Martinotti: D.E. 385 Page ID 9333 Footnote 4 – “**The videos provided by Kaul have been reviewed by this Court (ECF No. 241 at 93, Ref 1-13).**” The review of the videos by “this Court”, and Kaul assumes also by Judge Martinotti, undermines the opinion of Judge McNulty (D.E. 300 Page 8184), “I decline to view the videos, but credit, as I must, his allegation that the videos exist and demonstrate him “in action”.” i.e. performing surgery” and confirms the argument asserted by Kaul, “The irony, and there are many, is that K2 defendant Hafner used these videos on June 13, 2012, as evidence to have K2 defendant NJBME suspend Kaul’s license. These videos show Kaul performing minimally invasive spine surgery, and show how the patients benefited from the procedures. Judge McNulty gave no reason as to why he did not want to view these videos, but he willfully ignored evidence that undermines the state’s fraudulent case. The reason is not yet clear.” (K1 – D.E. 313-1 Page 8397). Judge Martinotti, the defendants and the Court have all viewed the videos, which show Kaul performing minimally invasive spine surgery, and show patients testifying about how the surgery improved their lives. This evidence irrefutably proves the falsity of the premise of the case that caused the illegal revocation of Kaul’s license, which is why Judge McNulty claims he personally did not review the videos, but he does not state that the Court did not view the videos. His arbitrary decision to not supposedly view the video, was a consequence of his knowledge, whether first or second hand, that the video evidence dismantled the state’s case, i.e. that Kaul was not

competent to perform minimally invasive spine surgery. Judge Martinotti claims that the Court, and therefore he, viewed the videos. The reason he viewed the videos was to attempt to neutralize Kaul's argument that the videos prove the falsity of the state's case. However, his silence on what he, the Court and defendants observed, proves the falsity of the state's case, for if the video evidence showed Kaul being unable to perform the procedure, Judge Martinotti, the Court and the defendants would have said as much. In fact, there are comments below the video (K1 – D.E. 241 Page ID 5822/Para. 5) from other physicians, who commend Kaul's technique. Judge Martinotti remained silent because he had received bribes from the defendants.

9. Assuming, arguendo, that 'The McNulty Analysis' is a motion for reconsideration, even though Kaul stated its purpose was to do nothing more than demonstrate the factual/legal error of Judge McNulty's opinion (D.E. 313-1 Page ID 8385), and even though Kaul did not agree it was a motion for reconsideration, as Judge Martinotti misrepresented in his opinion, dated July 29, 2019 (D.E. 385 Page ID 9333), Judge Martinotti, as with the defendants, has applied the wrong law. However, the fact that Judge McNulty permitted the defendants to respond to 'The McNulty Analysis' meant that under the law it was converted from a motion for reconsideration to a **motion to vacate judgment**, based on, amongst other things, a 'Fraud on the Court'. Local Rule 7(i) does not permit the filing of a response to a document the court deems to be a motion for reconsideration. Simply put, Judge Martinotti did not have before him a motion for reconsideration, and even if he did, he erroneously applied Local Rule 7(i), because he considered the defendant's omnibus opposition/response (D.E. 331 Page ID 8541). The Court committed knowing and reversible error, when it deemed 'The McNulty Analysis' a motion for reconsideration, and then permitted the defendants to file a response in violation of Local Rule 7(i). Neither the defendants nor the Court rebutted/contested/refuted the evidence/facts/law/arguments submitted by Kaul in his RESPONSE TO DEFENDANTS OPPOSITION TO 'The McNulty Analysis' (D.E. 341 Page 8675). These arguments dismantled those raised by the defendants in their omnibus opposition to 'The McNulty Analysis' (D.E. 331 Page ID 8541). Judge Martinotti knowingly perpetuated the reversible legal error initiated by Judge McNulty on February 22, 2019, because he had received bribes from the defendants (admitted on August 8, 2019 D.E. 387 Page ID 9354).

10. The Court's initial error is that it framed 'The McNulty Analysis' as a motion for reconsideration. It was not, but if it were to be framed as anything other than an identification of the legal/factual error of Judge McNulty's opinion (D.E. 300), then it was a **motion to vacate judgment**. The Court's subsequent error was that it permitted the defendants to respond to 'The McNulty Analysis', in violation of Local Rule 7(i), and if there was any remaining question that 'The McNulty Analysis' was a **motion to vacate judgment**, this act answered that question. Thus Judge Martinotti's legal analysis and conclusions (D.E. 385 Page ID 9334 to Page ID 9336) are respectively erroneous and false. However, for the sake of completeness, Kaul will analyze/distinguish the cited law:

11. Judge Martinotti's footnote 5 argument for dismissal of 'The McNulty Analysis' if deemed a **motion to vacate judgment** pursuant to F.R.C.P. 60, is false. Judge Martinotti, as with



Judge McNulty has ignored the evidence. On May 21, 2019 Kaul submitted a RESPONSE TO DEFENDANTS OPPOSITION TO 'The McNulty Analysis'. The defendants/Court did not contest/rebut/refute the evidence, facts, law and argument contained within. Kaul identified at least seventy-seven (77) instances of oversights, omissions (60a), fraud (60b3), any other reason that justifies relief (60b6) (D.E. 341 Page ID 8679 to Page ID 8691). Thus, the only way to interpret Judge Martinotti's knowingly false statement, **"For the same reasons that Kaul's motion is denied on the merits under the Local Rule, it is denied under the Federal Rules. See Holsworth v Berg, 322 F. App'x 143, (3d Cir. 2009) (construing ... Rule 59(e) motion to alter or amend a judgment ... prevent manifest injustice")."** is that he, as admitted on August 8, 2019, was bribed by the defendants (K1 – D.E. 387 Page ID 9352). Kaul did not premise the legal error and false facts of Judge McNulty's opinion on Rule 59(e), but on Rule 60 (a) to (c). The Holsworth case thus undermines Judge Martinotti's opinion.

A correct and un-corrupted legal analysis would be based on Rule 60, only, and not Local Rule 7(i) or 59(e). However, even assuming this were the appropriate law, which it is not, Kaul demonstrates below why the cited cases undermine Judge Martinotti's opinion:

12. On December 1, 2016, Judge Martinotti entered an opinion in the matter of Justin M. Cherry v. Borough of Tuckerton (Case No. 3-16-CV-00505-BRM-DEA – D.E. 23), that was identified as NOT FOR PUBLICATION. The verbiage under the subsection (page 2 to 4) labeled **"II. LEGAL STANDARD"** is almost identical to that found in Judge Martinotti's opinion on page 5 to 6 (D.E. 385 Page ID 9334 to 9336). In the Cherry case, the plaintiffs did not demonstrate one (1), let alone seventy-seven (77) instances of judicial oversights, omissions (60a), fraud (60b3), any other reason that justifies relief, and neither did the defendants file an opposition to what the plaintiffs expressly identified as a motion for reconsideration. The facts and procedure of this case bear no resemblance to those of the instant matter. The plaintiff's motion for reconsideration was based on Local Rule 7(i), not Rule 60 of the F.R.C.P. Regardless of these glaring inconsistencies, Judge Martinotti stresses the operative importance of the word **"overlooked"** in a Rule 7(i) analysis. **"Overlooked"** and **"oversight/omission"**, are synonymous, and Kaul has identified twelve instances (D.E. 341 Page ID 8679 to Page ID 8689) in Judge McNulty's erroneous opinion (D.E. 300). Thus if Judge Martinotti had honestly applied the same reasoning to the facts of the instant matter, the conclusion would be not to deny what the court framed as Kaul's motion for reconsideration, even though it was not, and which became converted into a **motion to vacate judgment**, when Judge McNulty permitted the defendants to file opposition papers (K1 – D.E. 325 Page ID 8479). Judge Martinotti's opinion is wrong for many reasons. **"The Court will reconsider a prior order only where a different outcome is justified by: (1) an intervening change in law; (2) the availability of new evidence not previously available; (3) a need to correct a clear error of law or manifest injustice."** See N. River Ins. Co. v. CIGNA Reinsurance, Co., 52 F.3d 1194, 1218 (3d Cir. 1995). Kaul has submitted evidence of a **"clear error of law"** and **"manifest injustice"** in Judge McNulty's opinion (D.E.300). This evidence is contained within 'The McNulty Analysis' (D.E. 313-1 Page ID 8384 to 8447) and within the RESPONSE TO DEFENDANTS OPPOSITION TO 'The McNulty Analysis' (D.E. 341 Page ID 8675), which contains at least seventy-seven (77) instances of omission, oversight, legal error (29), fraud on the court (36). These are not **"mere disagreements"**, as Judge Martinotti would like to have the record reflect, a direct consequence of his admitted acts of

corruption. The transmission across the US mail and wires by Judges Martinotti and McNulty of their knowingly false opinions, constitute the commission of the predicate acts of mail and wire fraud, in furtherance of the defendants “**pattern of racketeering**”, and their conversion of the District of New Jersey into a racketeering enterprise. The purpose of this scheme has been to illegally obstruct Kaul’s prosecution of K1 and K2, as alleged in Kaul v Schumer (Case No. 19-CV-13477).

13. The record in this case evidences at least seventy-seven (77) separate instances of oversight, omission, legal error and fraud on the court. These are not “**mere disagreements**” and the only reason they exist in such a substantial number is because the defendants bribed Judges McNulty, Martinotti (admitted), and have otherwise corrupted/influenced the remaining judges in the District of New Jersey. This is why the Third Circuit must grant Kaul’s petition for a writ of mandamus, ordering that all judges in the District of New Jersey disclose their financial holdings and conflicts of interest.

14. Judge Martinotti’s conclusions are false:

- a. ‘The McNulty Analysis’ (D.E. 313-1) and the RESPONSE TO DEFENDANTS OPPOSITION TO ‘The McNulty Analysis’ (D.E. 341) evidence that Judge McNulty’s opinion of February 22, 2019 (D.E. 300) is replete with clear error of fact and law, and multiple instances of fraud on the court.
- b. Kaul did not ask Judge McNulty to rethink (reconsider) his opinion, but simply submitted ‘The McNulty Analysis’ to demonstrate its clear, and Kaul asserts, intentional error of law and fact. Judge McNulty did not expect such a document to be submitted, but when it was, he permitted the defendants to file opposition papers, in an attempt to mitigate reversal on appeal, but this converted it into a **motion to vacate judgment**, for which Local Rule 7(i) is inapplicable, and Rule 60 of the FRCP is applicable. Thus, Judge Martinotti’s citation to S.C. ex rel. C.C. v. Deptford Tp. Bd of Educ., 248 F. Supp. 2d 368, 381 (D.N.J. 2003) is irrelevant. It is telling of Judge Martinotti’s propensity for dishonesty, that he would misrepresent the fact that “**Defendants and Kaul agreed**” that the purported motion for reconsideration was the “**only motion before the Court**” (D.E. 385 Page 9333). Kaul did not agree, and in fact reiterated the fact that ‘The McNulty Analysis’ was just that, a critical analysis of Judge McNulty’s error laden opinion.
- c. Judge Martinotti states, “**Kaul argues his Motion for Reconsideration (purported) should be granted because of legal alleged error, omission and fraud (See ECF No. 313-1)**”. (D.E. 385 Page ID 9335). However, Judge Martinotti fails to disprove or show that the error, omission and fraud is anything but fact, which the law (FRCP Rule 60), mandates a reversal of Judge McNulty’s order of February 22, 2019 (D.E. 300).
- d. Judge Martinotti’s characterization of Kaul’s showing of seventy-seven (77) separate instances of legal error, fraud on the court, omissions, oversights, as “**mere disagreements**” is evidence of his corrupted state-of-mind, and his admitted participation in the defendants quid pro quo schemes of bribery. The citation to Blystone is irrelevant, but even if it momentarily were, the fact that Judge McNulty

permitted the defendants to file opposition papers to 'The McNulty Analysis', would make it ultimately irrelevant.

- e. Judge Martinotti's claim to have "**clearly reviewed and considered the record and the arguments**" is false, because he failed, as did the defendants, to rebut/refute/contest/disprove the seventy-seven separate instances of legal error, fraud on the court, omissions and oversights (D.E. 341 Page ID 8675).
- f. Judge Martinotti's legal analysis and conclusion is false, is not based on the evidence, and has applied the wrong law, to the wrong facts, and found a wrong conclusion, that further evidences his admitted participation within the defendants schemes of judicial corruption.

These judges, defendants and the District of New Jersey must come under criminal investigation.

I certify that the above statements are true and accurate to the best of my knowledge, and that if it proved that I willfully misrepresented the facts, then I will be subject to punishment.

Dated: August 19, 2019

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Richard Arjun Kaul, MD

## **Exhibit 3**

[www.drrichardkaul.com](http://www.drrichardkaul.com)

**August 1, 2019**

The Honorable Douglas E. Arpert  
District Judge  
United States District Court  
District of New Jersey  
Clarkson S. Fisher Building and U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

**Request for admission or denial of statements pertaining to judicial corruption within the  
United States District Court for the District of New Jersey**

For reference purposes:

K1-Kaul v Christie: 16-CV-02364

K2-Kaul v Christie: 18-CV-08086

K3-Kaul v Schumer: 19-CV-13477

K4-Kaul v Stolz: 19-CV-01489 + Appeal: 18-CV-16485

P1-Patel v Allstate: 19-CV-08946

P2-Patel v Allstate: 19-CV-09232

**PLEASE POST TO THE DOCKETS IN ALL OF THE ABOVE CASES**

Dear Judge Arpert,

I write this letter, with the utmost respect, and appreciation for the work of the federal judiciary, but with an immense disappointment in the fact that such a letter is even warranted

This letter, and the document that I filed yesterday in the United States District Court for the District of New Jersey (copy enclosed) pertain to judicial corruption in this Court.

The purpose of this letter is to provide you an opportunity to confirm or deny the following statements:

1. I understand that exist schemes ("schemes") of judicial bribery and corruption within the United States District Court for the District of New Jersey ("court").
2. I have knowledge and have participated in the schemes.
3. I have knowledge that other judges currently within the court have participated, and do participate, in the schemes.
4. I have knowledge that ex-chief judge, Jose Linares ("Linares") participated in the schemes.
5. I have knowledge that Linares retired on May 16, 2019, because of a letter he received from Kaul and Patel, in which they demanded he disclose his financial holdings and conflicts of interest (copy enclosed).
6. I have knowledge that on May 16, 2019 Linares was made a partner at a New Jersey law firm by the name of McCarter and English.
7. I have knowledge that the law firm of McCarter and English provided the partnership to Linares as part of the scheme, and in return for having provided partial judgments in cases that involved this New Jersey law business.
8. I know that the appointment to the federal bench of Judge Brian R. Martinotti was sponsored by Senators Robert Menendez and Cory Booker ("senators").
9. I have discussed the above cases with the senators.
10. I have knowledge that the senators have received political campaign donations from some of the defendants in the above cases.
11. I have knowledge that the senators have been promised future political campaign donations from some of the defendants, based on dismissals of the above cases.
12. I have knowledge that defendants Allstate and Geico bribed the senators, as part of a series of quid pro quo schemes purposed to have the cases dismissed.
13. I and or members of my family to the third-degree, have received from the defendants, monies and or other benefits, of both a tangible and intangible nature.
14. I have knowledge that certain judges within the Third Circuit Federal Court of Appeals have received from the defendants, monies and or other benefits, of both a tangible and intangible nature.

I respectfully request that by August 8, 2019, you confirm or deny the above statements. If no responses are produced by this date, your non-response will cause the above statements to be admitted, and I will move accordingly.

I would also respectfully request that you submit to the record in the above cases, a copy of form AO 10A, that details your financial holdings and any potential conflicts of interest that you would have if the above cases were placed in your judicial remit.

This letter has been sent to every judge within the United States District Court for the District of New Jersey.

Thank you for your prompt attention to this matter.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R. Kaul', written in a cursive style.

Richard Arjun Kaul, MD  
cc: Clerk of the Court

[www.drrichardkaul.com](http://www.drrichardkaul.com)

August 1, 2019

The Honorable Tonianne J. Bongiovanni  
District Judge  
United States District Court  
District of New Jersey  
Clarkson S. Fisher Building and U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

**Request for admission or denial of statements pertaining to judicial corruption within the  
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P1-Patel v Allstate: 19-CV-08946

P2-Patel v Allstate: 19-CV-09232

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Dear Judge Bongiovanni,

I write this letter, with the utmost respect, and appreciation for the work of the federal judiciary, but with an immense disappointment in the fact that such a letter is even warranted

This letter, and the document that I filed yesterday in the United States District Court for the District of New Jersey (copy enclosed) pertain to judicial corruption in this Court.

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2. I have knowledge and have participated in the schemes.
3. I have knowledge that other judges currently within the court have participated, and do participate, in the schemes.
4. I have knowledge that ex-chief judge, Jose Linares ("Linares") participated in the schemes.
5. I have knowledge that Linares retired on May 16, 2019, because of a letter he received from Kaul and Patel, in which they demanded he disclose his financial holdings and conflicts of interest (copy enclosed).
6. I have knowledge that on May 16, 2019 Linares was made a partner at a New Jersey law firm by the name of McCarter and English.
7. I have knowledge that the law firm of McCarter and English provided the partnership to Linares as part of the scheme, and in return for having provided partial judgments in cases that involved this New Jersey law business.
8. I know that the appointment to the federal bench of Judge Brian R. Martinotti was sponsored by Senators Robert Menendez and Cory Booker ("senators").
9. I have discussed the above cases with the senators.
10. I have knowledge that the senators have received political campaign donations from some of the defendants in the above cases.
11. I have knowledge that the senators have been promised future political campaign donations from some of the defendants, based on dismissals of the above cases.
12. I have knowledge that defendants Allstate and Geico bribed the senators, as part of a series of quid pro quo schemes purposed to have the cases dismissed.
13. I and or members of my family to the third-degree, have received from the defendants, monies and or other benefits, of both a tangible and intangible nature.
14. I have knowledge that certain judges within the Third Circuit Federal Court of Appeals have received from the defendants, monies and or other benefits, of both a tangible and intangible nature.

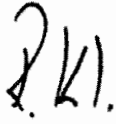
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Yours sincerely

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Richard Arjun Kaul, MD  
cc: Clerk of the Court

[www.drrichardkaul.com](http://www.drrichardkaul.com)

August 1, 2019

The Honorable Renee Marie Bumb  
District Judge  
United States District Court  
District of New Jersey  
Mitchell H. Cohen Building and Courthouse  
4<sup>th</sup> and Cooper Streets  
Camden, NJ 08101

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

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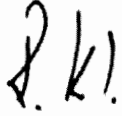
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Yours sincerely

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Richard Arjun Kaul, MD  
cc: Clerk of the Court

[www.drrichardkaul.com](http://www.drrichardkaul.com)

August 1, 2019

The Honorable Claire C. Cecchi  
District Judge  
United States District Court  
District of New Jersey  
50 Walnut Street  
Newark, NJ 07102

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

**Request for admission or denial of statements pertaining to judicial corruption within the  
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P1-Patel v Allstate: 19-CV-08946

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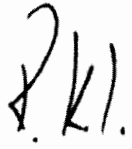
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This letter has been sent to every judge within the United States District Court for the District of New Jersey.

Thank you for your prompt attention to this matter.

Yours sincerely

Handwritten signature in black ink, appearing to be 'R. Kaul'.

Richard Arjun Kaul, MD  
cc: Clerk of the Court



[www.drrichardkaul.com](http://www.drrichardkaul.com)

**August 1, 2019**

The Honorable Stanley R. Chesler  
District Judge  
United States District Court  
District of New Jersey  
50 Walnut Street  
Newark, NJ 07102

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

**Request for admission or denial of statements pertaining to judicial corruption within the  
United States District Court for the District of New Jersey**

For reference purposes:

K1-Kaul v Christie: 16-CV-02364

K2-Kaul v Christie: 18-CV-08086

K3-Kaul v Schumer: 19-CV-13477

K4-Kaul v Stolz: 19-CV-01489 + Appeal: 18-CV-16485

P1-Patel v Allstate: 19-CV-08946

P2-Patel v Allstate: 19-CV-09232

**PLEASE POST TO THE DOCKETS IN ALL OF THE ABOVE CASES**

Dear Judge Chesler,

I write this letter, with the utmost respect, and appreciation for the work of the federal judiciary, but with an immense disappointment in the fact that such a letter is even warranted

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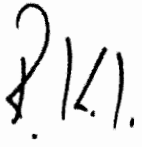
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Thank you for your prompt attention to this matter.

Yours sincerely

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Richard Arjun Kaul, MD  
cc: Clerk of the Court

[www.drrichardkaul.com](http://www.drrichardkaul.com)

August 1, 2019

The Honorable James B. Clark, III  
District Judge  
United States District Court  
District of New Jersey  
50 Walnut Street  
Newark, NJ 07102

Re: **Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

**Request for admission or denial of statements pertaining to judicial corruption within the United States District Court for the District of New Jersey**

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P1-Patel v Allstate: 19-CV-08946

P2-Patel v Allstate: 19-CV-09232

**PLEASE POST TO THE DOCKETS IN ALL OF THE ABOVE CASES**

Dear Judge Clark,

I write this letter, with the utmost respect, and appreciation for the work of the federal judiciary, but with an immense disappointment in the fact that such a letter is even warranted

This letter, and the document that I filed yesterday in the United States District Court for the District of New Jersey (copy enclosed) pertain to judicial corruption in this Court.

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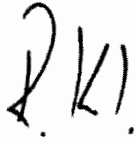
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This letter has been sent to every judge within the United States District Court for the District of New Jersey.

Thank you for your prompt attention to this matter.

Yours sincerely

Handwritten signature of Richard Arjun Kaul, MD, consisting of the initials 'R.K.' in a cursive style.

Richard Arjun Kaul, MD  
cc: Clerk of the Court

[www.drrichardkaul.com](http://www.drrichardkaul.com)

**August 1, 2019**

The Honorable Madeline Cox Arleo  
District Judge  
United States District Court  
District of New Jersey  
50 Walnut Street  
Newark, NJ 07102

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

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P1-Patel v Allstate: 19-CV-08946

P2-Patel v Allstate: 19-CV-09232

**PLEASE POST TO THE DOCKETS IN ALL OF THE ABOVE CASES**

Dear Judge Cox Arleo,

I write this letter, with the utmost respect, and appreciation for the work of the federal judiciary, but with an immense disappointment in the fact that such a letter is even warranted

This letter, and the document that I filed yesterday in the United States District Court for the District of New Jersey (copy enclosed) pertain to judicial corruption in this Court.

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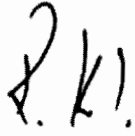
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Thank you for your prompt attention to this matter.

Yours sincerely



Handwritten signature of Richard Arjun Kaul, consisting of stylized initials 'R.A.K.' followed by a period.

Richard Arjun Kaul, MD  
cc: Clerk of the Court

[www.drrichardkaul.com](http://www.drrichardkaul.com)

August 1, 2019

The Honorable Joseph Dickson  
District Judge  
United States District Court  
District of New Jersey  
50 Walnut Street  
Newark, NJ 07102

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

**Request for admission or denial of statements pertaining to judicial corruption within the  
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**PLEASE POST TO THE DOCKETS IN ALL OF THE ABOVE CASES**

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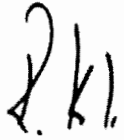
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Handwritten signature in black ink, appearing to be 'R. Kaul'.

Richard Arjun Kaul, MD  
cc: Clerk of the Court

[www.drrichardkaul.com](http://www.drrichardkaul.com)

August 1, 2019

The Honorable Ann Marie Donio  
District Judge  
United States District Court  
District of New Jersey  
Mitchell H. Cohen Building and Courthouse  
4<sup>th</sup> and Cooper Streets  
Camden, NJ 08101

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

**Request for admission or denial of statements pertaining to judicial corruption within the  
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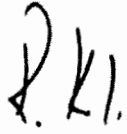
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Richard Arjun Kaul, MD  
cc: Clerk of the Court

[www.drrichardkaul.com](http://www.drrichardkaul.com)

**August 1, 2019**

The Honorable Mark Falk  
District Judge  
United States District Court  
District of New Jersey  
50 Walnut Street  
Newark, NJ 07102

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

**Request for admission or denial of statements pertaining to judicial corruption within the  
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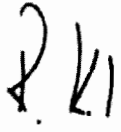
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Richard Arjun Kaul, MD  
cc: Clerk of the Court

[www.drrichardkaul.com](http://www.drrichardkaul.com)

August 1, 2019

The Honorable Lois H. Goodman  
District Judge  
United States District Court  
District of New Jersey  
Clarkson S. Fisher Building and U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

**Request for admission or denial of statements pertaining to judicial corruption within the  
United States District Court for the District of New Jersey**

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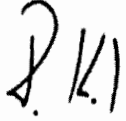
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This letter has been sent to every judge within the United States District Court for the District of New Jersey.

Thank you for your prompt attention to this matter.

Yours sincerely

A handwritten signature in black ink, appearing to be 'R. Kaul'.

Richard Arjun Kaul, MD  
cc: Clerk of the Court

[www.drrichardkaul.com](http://www.drrichardkaul.com)

August 1, 2019

The Honorable Michael A. Hammer  
District Judge  
United States District Court  
District of New Jersey  
50 Walnut Street  
Newark, NJ 07102

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

**Request for admission or denial of statements pertaining to judicial corruption within the  
United States District Court for the District of New Jersey**

For reference purposes:

K1-Kaul v Christie: 16-CV-02364

K2-Kaul v Christie: 18-CV-08086

K3-Kaul v Schumer: 19-CV-13477

K4-Kaul v Stolz: 19-CV-01489 + Appeal: 18-CV-16485

P1-Patel v Allstate: 19-CV-08946

P2-Patel v Allstate: 19-CV-09232

**PLEASE POST TO THE DOCKETS IN ALL OF THE ABOVE CASES**

Dear Judge Hammer,

I write this letter, with the utmost respect, and appreciation for the work of the federal judiciary, but with an immense disappointment in the fact that such a letter is even warranted

This letter, and the document that I filed yesterday in the United States District Court for the District of New Jersey (copy enclosed) pertain to judicial corruption in this Court.

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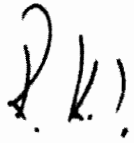
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Yours sincerely

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Richard Arjun Kaul, MD  
cc: Clerk of the Court



[www.drrichardkaul.com](http://www.drrichardkaul.com)

August 1, 2019

The Honorable Katherine S. Hayden  
District Judge  
United States District Court  
District of New Jersey  
50 Walnut Street  
Newark, NJ 07102

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

**Request for admission or denial of statements pertaining to judicial corruption within the  
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P1-Patel v Allstate: 19-CV-08946

P2-Patel v Allstate: 19-CV-09232

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Dear Judge Hayden,

I write this letter, with the utmost respect, and appreciation for the work of the federal judiciary, but with an immense disappointment in the fact that such a letter is even warranted

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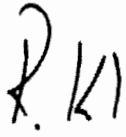
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This letter has been sent to every judge within the United States District Court for the District of New Jersey.

Thank you for your prompt attention to this matter.

Yours sincerely

Handwritten signature of Richard Arjun Kaul, consisting of the initials 'R. K.' in a cursive style.

Richard Arjun Kaul, MD  
cc: Clerk of the Court

[www.drrichardkaul.com](http://www.drrichardkaul.com)

August 1, 2019

The Honorable Noel L. Hillman  
District Judge  
United States District Court  
District of New Jersey  
Mitchell H. Cohen Building and Courthouse  
4<sup>th</sup> and Cooper Streets  
Camden, NJ 08101

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

**Request for admission or denial of statements pertaining to judicial corruption within the  
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P1-Patel v Allstate: 19-CV-08946

P2-Patel v Allstate: 19-CV-09232

**PLEASE POST TO THE DOCKETS IN ALL OF THE ABOVE CASES**

Dear Judge Hillman,

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Thank you for your prompt attention to this matter.

Yours sincerely

Handwritten signature of Richard Arjun Kaul, consisting of the initials 'R. K.' followed by a period.

Richard Arjun Kaul, MD  
cc: Clerk of the Court

[www.drrichardkaul.com](http://www.drrichardkaul.com)

August 1, 2019

The Honorable Robert B. Kugler  
District Judge  
United States District Court  
District of New Jersey  
Mitchell H. Cohen Building and Courthouse  
4<sup>th</sup> and Cooper Streets  
Camden, NJ 08101

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

**Request for admission or denial of statements pertaining to judicial corruption within the  
United States District Court for the District of New Jersey**

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P1-Patel v Allstate: 19-CV-08946

P2-Patel v Allstate: 19-CV-09232

**PLEASE POST TO THE DOCKETS IN ALL OF THE ABOVE CASES**

Dear Judge Kugler,

I write this letter, with the utmost respect, and appreciation for the work of the federal judiciary, but with an immense disappointment in the fact that such a letter is even warranted

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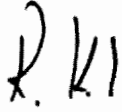
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Yours sincerely

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Richard Arjun Kaul, MD  
cc: Clerk of the Court

[www.drrichardkaul.com](http://www.drrichardkaul.com)

**August 1, 2019**

The Honorable Steven C. Mannion  
District Judge  
United States District Court  
District of New Jersey  
50 Walnut Street  
Newark, NJ 07102

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

**Request for admission or denial of statements pertaining to judicial corruption within the  
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**PLEASE POST TO THE DOCKETS IN ALL OF THE ABOVE CASES**

Dear Judge Mannion,

I write this letter, with the utmost respect, and appreciation for the work of the federal judiciary, but with an immense disappointment in the fact that such a letter is even warranted

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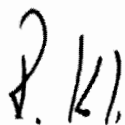
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Handwritten signature of Richard Arjun Kaul, consisting of a stylized 'R' followed by 'A. Kaul'.

Richard Arjun Kaul, MD  
cc: Clerk of the Court

[www.drrichardkaul.com](http://www.drrichardkaul.com)

August 1, 2019

The Honorable William J. Martini  
District Judge  
United States District Court  
District of New Jersey  
50 Walnut Street  
Newark, NJ 07102

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

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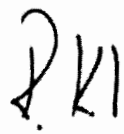
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Richard Arjun Kaul, MD  
cc: Clerk of the Court

[www.drrichardkaul.com](http://www.drrichardkaul.com)

August 1, 2019

The Honorable Zahid N. Quraishi  
District Judge  
United States District Court  
District of New Jersey  
Clarkson S. Fisher Building and U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

**Request for admission or denial of statements pertaining to judicial corruption within the  
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P2-Patel v Allstate: 19-CV-09232

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Dear Judge Quraishi,

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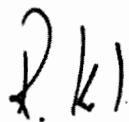
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Richard Arjun Kaul, MD  
cc: Clerk of the Court

[www.drrichardkaul.com](http://www.drrichardkaul.com)

**August 1, 2019**

The Honorable Joseph H. Rodriguez  
District Judge  
United States District Court  
District of New Jersey  
Mitchell H. Cohen Building and Courthouse  
4<sup>th</sup> and Cooper Streets  
Camden, NJ 08101

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

**Request for admission or denial of statements pertaining to judicial corruption within the  
United States District Court for the District of New Jersey**

For reference purposes:

K1-Kaul v Christie: 16-CV-02364

K2-Kaul v Christie: 18-CV-08086

K3-Kaul v Schumer: 19-CV-13477

K4-Kaul v Stolz: 19-CV-01489 + Appeal: 18-CV-16485

P1-Patel v Allstate: 19-CV-08946

P2-Patel v Allstate: 19-CV-09232

**PLEASE POST TO THE DOCKETS IN ALL OF THE ABOVE CASES**

Dear Judge Rodriguez,

I write this letter, with the utmost respect, and appreciation for the work of the federal judiciary, but with an immense disappointment in the fact that such a letter is even warranted

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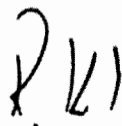
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This letter has been sent to every judge within the United States District Court for the District of New Jersey.

Thank you for your prompt attention to this matter.

Yours sincerely

A handwritten signature in black ink, appearing to be 'R. Kaul'.

Richard Arjun Kaul, MD  
cc: Clerk of the Court

[www.drrichardkaul.com](http://www.drrichardkaul.com)

August 1, 2019

The Honorable Esther Salas  
District Judge  
United States District Court  
District of New Jersey  
50 Walnut Street  
Newark, NJ 07102

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

**Request for admission or denial of statements pertaining to judicial corruption within the  
United States District Court for the District of New Jersey**

For reference purposes:

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P1-Patel v Allstate: 19-CV-08946

P2-Patel v Allstate: 19-CV-09232

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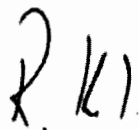
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Thank you for your prompt attention to this matter.

Yours sincerely

Handwritten signature in black ink, appearing to be 'R. Kaul'.

Richard Arjun Kaul, MD  
cc: Clerk of the Court



[www.drrichardkaul.com](http://www.drrichardkaul.com)

August 1, 2019

The Honorable Joel Schneider  
District Judge  
United States District Court  
District of New Jersey  
Mitchell H. Cohen Building and Courthouse  
4<sup>th</sup> and Cooper Streets  
Camden, NJ 08101

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

**Request for admission or denial of statements pertaining to judicial corruption within the  
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P2-Patel v Allstate: 19-CV-09232

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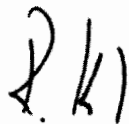
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Richard Arjun Kaul, MD  
cc: Clerk of the Court

[www.drrichardkaul.com](http://www.drrichardkaul.com)

**August 1, 2019**

The Honorable Peter G. Sheridan  
District Judge  
United States District Court  
District of New Jersey  
Clarkson S. Fisher Building and U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

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P1-Patel v Allstate: 19-CV-08946

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**PLEASE POST TO THE DOCKETS IN ALL OF THE ABOVE CASES**

Dear Judge Sheridan,

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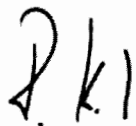
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Yours sincerely

Handwritten signature of Richard Arjun Kaul, consisting of the initials 'R. K.' in a cursive style.

Richard Arjun Kaul, MD  
cc: Clerk of the Court

[www.drrichardkaul.com](http://www.drrichardkaul.com)

August 1, 2019

The Honorable Michael A. Shipp  
District Judge  
United States District Court  
District of New Jersey  
Clarkson S. Fisher Building and U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

**Re: Kaul v Christie, et al.**

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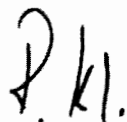
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Richard Arjun Kaul, MD  
cc: Clerk of the Court

[www.drrichardkaul.com](http://www.drrichardkaul.com)

August 1, 2019

The Honorable Jerome B. Simandle  
District Judge  
United States District Court  
District of New Jersey  
Mitchell H. Cohen Building and Courthouse  
4<sup>th</sup> and Cooper Streets  
Camden, NJ 08101

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

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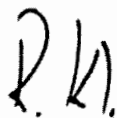
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Richard Arjun Kaul, MD  
cc: Clerk of the Court

[www.drrichardkaul.com](http://www.drrichardkaul.com)

August 1, 2019

The Honorable Anne. E. Thompson  
District Judge  
United States District Court  
District of New Jersey  
Clarkson S. Fisher Building and U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

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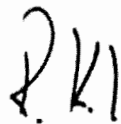
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Richard Arjun Kaul, MD  
cc: Clerk of the Court

[www.drrichardkaul.com](http://www.drrichardkaul.com)

**August 1, 2019**

The Honorable John Michael Vasquez  
District Judge  
United States District Court  
District of New Jersey  
50 Walnut Street  
Newark, NJ 07102

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

**Request for admission or denial of statements pertaining to judicial corruption within the  
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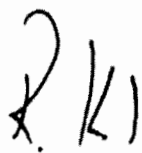
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Yours sincerely

Handwritten signature of Richard Arjun Kaul, consisting of stylized initials 'R' and 'K'.

Richard Arjun Kaul, MD  
cc: Clerk of the Court

[www.drrichardkaul.com](http://www.drrichardkaul.com)

August 1, 2019

The Honorable Cathy L. Waldor  
District Judge  
United States District Court  
District of New Jersey  
50 Walnut Street  
Newark, NJ 07102

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

**Request for admission or denial of statements pertaining to judicial corruption within the  
United States District Court for the District of New Jersey**

For reference purposes:

K1-Kaul v Christie: 16-CV-02364

K2-Kaul v Christie: 18-CV-08086

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P1-Patel v Allstate: 19-CV-08946

P2-Patel v Allstate: 19-CV-09232

**PLEASE POST TO THE DOCKETS IN ALL OF THE ABOVE CASES**

Dear Judge Waldor,

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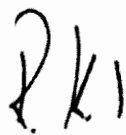
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Thank you for your prompt attention to this matter.

Yours sincerely

Handwritten signature of Richard Arjun Kaul, consisting of the letters 'R' and 'K' in a stylized, cursive font.

Richard Arjun Kaul, MD  
cc: Clerk of the Court

[www.drrichardkaul.com](http://www.drrichardkaul.com)

**August 1, 2019**

The Honorable William H. Walls  
District Judge  
United States District Court  
District of New Jersey  
50 Walnut Street  
Newark, NJ 07102

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

**Request for admission or denial of statements pertaining to judicial corruption within the  
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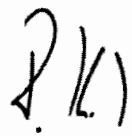
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Richard Arjun Kaul, MD  
cc: Clerk of the Court



[www.drrichardkaul.com](http://www.drrichardkaul.com)

**August 1, 2019**

The Honorable Leda Dunn Wettre  
District Judge  
United States District Court  
District of New Jersey  
50 Walnut Street  
Newark, NJ 07102

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

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**PLEASE POST TO THE DOCKETS IN ALL OF THE ABOVE CASES**

Dear Judge Wettre,

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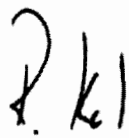
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Richard Arjun Kaul, MD  
cc: Clerk of the Court

[www.drrichardkaul.com](http://www.drrichardkaul.com)

August 1, 2019

The Honorable Susan D. Wigenton  
District Judge  
United States District Court  
District of New Jersey  
50 Walnut Street  
Newark, NJ 07102

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

**Request for admission or denial of statements pertaining to judicial corruption within the United States District Court for the District of New Jersey**

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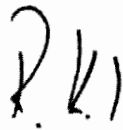
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Richard Arjun Kaul, MD  
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[www.drrichardkaul.com](http://www.drrichardkaul.com)

August 1, 2019

The Honorable Karen M. Williams  
District Judge  
United States District Court  
District of New Jersey  
Mitchell H. Cohen Building and Courthouse  
4<sup>th</sup> and Cooper Streets  
Camden, NJ 08101

**Re: Kaul v Christie, et al.**

**Docket No. 16-CV-02364**

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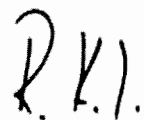
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Handwritten signature of Richard Arjun Kaul, MD, consisting of the initials 'R.A.K.' in a cursive style.

Richard Arjun Kaul, MD  
cc: Clerk of the Court



**Geri Albin**  
**973-845-7719**  
**galbin@saiber.com**

October 18, 2019

**BY ECF**

The Honorable Brian R. Martinotti, U.S.D.J.  
United States District Court for the District of New Jersey  
Frank R. Lautenberg U.S. P.O. & Courthouse Bldg.  
1 Federal Square  
Newark, New Jersey 07101

**Re: *Kaul v. Christopher J. Christie, Esq. et al.* – (K1)**  
**C.A. No. 2:16-cv-02364 (BRM)(JAD)**

***Kaul v. Christopher J. Christie, Esq. et al.* – (K2)**  
**C.A. No. 2:18-cv-08086 (BRM)(JAD)**

***Dr. Harshad Patel, et al. v. Richard Crist, et al.* – (P1)**  
**C.A. No. 2:19-cv-8946 (BRM)(JAD)**

***Dr. Harshad Patel, et al. v. Richard Crist, et al.* – (P2)**  
**C.A. No. 2:19-cv-9232 (BRM)(JAD)**

---

Dear Judge Martinotti:

We represent defendants Allstate New Jersey Insurance Company, Allstate Insurance Company, Benjamin Hickey and Richard Crist (collectively the “Allstate Defendants”) in the above matters.

We submit this letter jointly on behalf of all Defendants to respectfully request the Court’s approval of a two-week extension of time for Defendants to file its opposition papers to Plaintiff’s Motion for Judicial Disqualification of Judge Martinotti that was docketed on October 15, 2019. Under the proposed amended briefing schedule, the deadline for Defendants’ opposition papers would be extended from October 21 to November 4 and Plaintiffs’ reply papers would be extended from October 28 until November 12.

We respectfully submit that good cause supports this extension. The parties request an adjustment to the briefing schedule to allow the Defendants the opportunity to coordinate a response to this motion in an effort to avoid duplicative filings on multiple dockets.

If this request meets with the Court’s approval, we respectfully request that Your Honor “So Order” this letter and have it entered on the docket by the Clerk of the Court.

The Honorable Brian R. Martinotti, U.S.D.J.  
October 18, 2019  
Page 2

We thank the Court for its consideration and continued assistance in this matter. If the Court has any questions, we would be pleased to address them at the Court's convenience.

Respectfully yours,

s/ Geri Albin

cc: All Counsel of Record (by electronic mail)

The foregoing request to extend Defendants' time to file their opposition to Plaintiff's Motion to Disqualify Judge Martinotti until November 4, 2019 and the Plaintiff's time to reply to Defendants' Opposition until November 12, 2019, be and the same is hereby **GRANTED**.

**SO ORDERED** this \_\_\_\_ day of October, 2019.

---

**HONORABLE BRIAN MARTINOTTI  
UNITED STATES DISTRICT JUDGE**

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

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**In re Richard Arjun Kaul, MD  
Petitioner**

---

**On Petition for a Writ of Mandamus to the U.S. District Court for the  
District of New Jersey in Case No. 16-CV-02364 – JMV  
Richard Arjun Kaul, MD v. Christopher J. Christie, Esq**

---

**EMERGENCY PETITION FOR WRIT OF MANDAMUS**

---

**Richard Arjun Kaul, MD  
Propria Persona  
440c Somerset Drive  
Pearl River, NY 10965  
drrichardkaul@gmail.com  
Dated: March 31, 2021**

## Contents

### **Authorities:**

Appendix A Page KAUL:005

These are pled within Appendix A.

### **Parties to The Proceeding:**

Appendix A Page KAUL:008

These are pled within Appendix A.

### **Relief Sought:**

Petition Page 3 + Appendix A Page KAUL:008

These are pled within this petition and Appendix A.

### **Standard of Review Under the All Writs Act:**

Petition Page 5 + Appendix A Page KAUL:009

This are pled within this petition and Appendix A.

### **Statements/Facts Necessary to Understand Petition:**

Petition Page 6 + Appendix A Page KAUL: 010 + Appendix B Page KAUL:050 + Appendix C Page KAUL:081 + Appendix D Page KAUL:268

These are pled within this petition and Appendices A + B + C + D.

### **Reasons for Granting the Writ:**

Petition Page 8 + Appendix A Page 038

These are pled within this petition and Appendix A.

### **Conclusion:**

Petition Page 9

This is pled within this petition.

## **Relief Sought**

Petitioner Richard Arjun Kaul, MD (“Kaul”) respectfully requests that this Court grant Kaul’s petition for a writ of mandamus and enter: **(i)** a standing order in the United States District Court that any orders issued by any judges within Defendant DNJ-Newark at any point after March 31, 2021, regarding **The Kaul Cases** are null and void; **(ii)** an order that compels judges within the U.S.C.A. for the Third Circuit and the U.S.D.C. for the District of New Jersey to disclose to the record their Forms AO 10, as required by law; **(iii)** disqualify all Defendant judges in Defendant DNJ-Newark from any participation/involvement to any degree in any aspects of **The Kaul Cases.**

Kaul respectfully certifies that **The Kaul Cases** Defendants have within their multiple submissions, failed to contest the evidence, facts and law, submitted by Kaul, that any orders issued by any judges within Defendant DNJ-Newark are and will be null and void.

## Issues Presented

1. The continued illegal participation in The Kaul Cases by Defendants U.S.D.C.-Newark/Vazquez.
2. The continued failure of judges on both Defendant U.S.D.C.-Newark and U.S.C.A. for the Third Circuit to disclose their AO 10 Forms to the record as required by law.
3. The issuance on March 30, 2021 of an arbitrary order (U.S.C.A. Case No. 20-3522 D.E. 26) that requires the parties to submit written reports addressing the status of the document (D.E. 450) every thirty (30) days until the District Court has disposed of the document.
4. The potential effect of a corrupted judicial system on foreign investment in the US.
5. The potential effect of reduced foreign investment on the NYSE.

The U.S.C.A. for the Third Circuit, in scouring the record for some reason to usurp the mandamus authority of this Court, has attempted to manufacture an obstacle to the **“there exists no other form of relief”** element of a writ petition. The order entered on March 30, 2021 has neither legal basis nor authority, as the Court/Judges from which it was issued have failed to disclose their financial holdings as required by law.

## **Standard of Review Under The All Writs Act**

The All Writs Act, 28 U.S.C. §1651, authorizes the issuance of all writs necessary or appropriate in aid of the court's jurisdiction. The power of an original panel of a United States Court of Appeals to grant relief enforcing and protecting the terms of its mandate is well established in the Supreme Court, this Circuit and other federal courts of appeal. For example, in Citibank v. Fullum, this Court noted that: **"Despite federal appellate courts' general reluctance to grant writs of mandamus ...The Supreme Court has repeatedly held that an appellate court has jurisdiction under U.S.C. §1651 to issue a writ of mandamus to compel an inferior court to comply"**. To obtain a writ of mandamus in the Supreme Circuit, a party must show **(i)** a grant is in the public interest; **(ii)** there exist extraordinary/exceptional facts/circumstances that warrant a writ; **(iii)** there exists no other form of relief.



## **Statements + Facts Necessary to Understand Petition**

### **Appendix A - November 3, 2020: 16-CV-02364: Petition to SCOTUS for Writ of Mandamus:**

This petition is based in part of the facts asserted in the petition filed on November 5, 2020.

### **Appendix B - January 7, 2021: 16-CV-02364/Case No. 20-3522: Notice re: Form AO10 Judicial Disclosures:**

This petition is based in part on the facts asserted in the request for disclosure of Forms AO10 by judges within the U.S.C.A for the Third Circuit.

### **Appendix C - March 24, 2021: 16-CV-02364/Case No. 20-3522: Letter from Kaul to Clerk of the U.S.C.A. for the Third Circuit re: lack of jurisdiction of Defendant DNJ-Newark:**

This petition is based in part on the facts asserted in the letter submitted to the Clerk of the Court in the U.S.C.A. for the Third Circuit.

### **Appendix D - March 30, 2021: 16-CV-02364/Case No. 20-3522: Order staying appeal:**

This petition is based in part on the fact of the fraud asserted in an order, that although signed by the Clerk of the Court, is the product of an illegal conspiracy between Defendant Christie and Judge Paul Masey. The Clerk of the Court for the U.S.C.A. for the Third Circuit entered an order, which is a 'Fraud on the Court'. The cited law is: Fed. R. App. P. 4(a)(4) - **"Effect of a Motion on Notice of Appeal – If a party files in the district court any of the following motions under the Federal Rules of Civil Procedure- and does so within the time allowed by those rules-the time to file an appeal runs for all parties from the entry of the order disposing of the last such remaining motion: (iv) to alter or amend the judgment under Rule 59."** The relevant local rule

is: Civ. RULE 7.1 APPLICATION AND MOTION PRACTICE - **“(d) Filing Motion Papers (1) No application will be heard unless the moving papers and a brief, prepared in accordance with L.Civ.R. 7.2, ... and shall note the motion day on the cover page; (2) The brief and papers in opposition to a motion, specifying the motion day on the cover page ...”**. The facts are: D.E. 450: Captioned as **“Admissions of fact + Petition to SCOTUS re: writ of mandamus ...** These submissions (NOT MOTION) are relevant to D.E. 448/449, to Kaul’s petition to SCOTUS re: writ of mandamus to the District of New Jersey and will facilitate appellate determination of any appeals that might ensue from the case. Additionally, the submitted evidence is probative of the claims of The Kaul Cases and will facilitate/mitigate a global resolution of pending/future litigation.”

D.E. 450 is patently neither a pre-nor post-decision motion, as defined under Civ. RULE 7.1 APPLICATION AND MOTION PRACTICE. This order constitutes a ‘Fraud on the Court’ that is the product of communications between Defendant Christie and Judge Paul Masey, and which is attempt, albeit futile, to undermine the fact that the law deprives Defendants DNJ-Newark/Vazquez of the authority to participate in any manner in any aspects of The Kaul Cases. The four (4) reasons are: **(i)** the case remains pending in the U.S.C.A. for the Third Circuit; **(ii)** Defendant DNJ-Newark is a Defendant in K11-1; **(iii)** Defendant U.S.D.J. Vazquez is a Defendant in K11-3; **(iv)** Defendant U.S.D.J. Vazquez is subject to disciplinary action in the Judicial Council for the Third Circuit. The order is the product of a fraud, is a fraud, is null and void, and thus K1 remains on appeal, and any order issued by U.S.D.J. Defendant Vazquez is a fraud, is null and

void and thus the law prohibits any other court in the United States from either docketing or considering it.

## **Reasons for Granting the Writ**

These are pled within this petition and Appendix A

## Conclusion

The Defendants constitute a miniscule percentage of the American economy yet threaten to tarnish the global reputation of the NYSE and America's judicial system with their grand schemes of corruption. The grant of the within sought relief will protect the integrity of the federal system of justice and provide district court judges the protection they require from the predatory/illegal tactics (bribery/coercion/fraud/corruption) of The Kaul Cases Defendants.

Kaul believes it relevant for this Court to know that senior members of the global investment community are aware of the immense risk associated with the litigation against Defendants Allstate/Geico/TD. This litigation, as indicated in this submission, will expand into international courts, including the Indian High Court, where the American record of The Kaul Cases (Currently-April 2, 2012 to April 2, 2021) will be submitted. Defendants Allstate/Geico/TD and their associated investors have international holdings, subject to seizure on international judgments/warrants.

America represents all its citizens and corporations, not just the miniscule element of The Kaul Cases Defendants. A win in these cases is a win for many millions of American patients and physicians, and it will be a win for American justice on a global stage. It will lend further weight to America's moral authority in the establishment of an International Anti-Corruption Court, a court that many countries are looking to for justice against tyrannical systems and dictators. Tyranny can be found at the end of a noose or the entrance to a court, but in both places the tyrant murders law. America can be neither of those places, places from which the dream of

America was born. The Kaul Cases and this Court present a historical opportunity to steer America back towards a moral arc and away from wicked ways and lawlessness.

I certify that the above statements are true and accurate to the best of my knowledge and that if it is proved that I willfully and knowingly misrepresented the facts, then I will be subject to punishment.

Dated: March 31, 2021

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Richard Arjun Kaul, MD

# Appendix A

No. \_\_\_\_\_

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

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In re Richard Arjun Kaul, MD

Petitioner

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On Petition for a Writ of Mandamus to the U.S. District Court for the District  
of New Jersey in Case No. 16-CV-02364 – JMV-JAD  
Richard Arjun Kaul, MD v. Christopher J. Christie, Esq

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**EMERGENCY PETITION FOR WRIT OF MANDAMUS**

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Richard Arjun Kaul, MD  
Propria Persona  
440c Somerset Drive  
Pearl River, NY 10965

[drrichardkaul@gmail.com](mailto:drrichardkaul@gmail.com)

Dated: November 3, 2020



**The following cases (hereinafter “The Kaul Cases”) are related to the instant matter, and are referenced within the document according to the below key:**

**K1: Kaul v Christie: 16-CV-02364 – U.S.D.C. for D.N.J**

**K2: Kaul v Christie: 18-CV-08086 – U.S.D.C. for D.N.J.**

**K3: Kaul v Schumer: 19-CV-13477 – U.S.D.C. for D.N.J.**

**K4: Kaul v Stolz: 18-CV-01489 – Bankruptcy Court for D.N.J.**

**K5: Kaul v Federation: 19-CV-3050 – U.S.D.C. for D.C.**

**K6: Kaul v Kaufman: State Criminal Indictment.**

**K7: Kaul v Federation: 20-CV-01612 – U.S.D.C. for D.C.**

**P1: Patel/Kaul v Crist/Allstate: 19-CV-08946 – U.S.D.C. for D.N.J.**

**P2: Patel/Kaul v Crist/State of New Jersey: 19-CV-09232 – U.S.D.C. for D.N.J.**

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## Parties To The Proceeding

Richard Arjun Kaul, MD is the Plaintiff in this action. The Defendants are: **(1)** Allstate New Jersey Insurance Company; **(2)** Andrew Kaufman, MD; **(3)** American Society of Interventional Pain Physicians (ASIPP); **(4)** Atlantic Health System (ANS); **(5)** Christopher Wolfla, MD; **(6)** Congress of Neurological Surgeons (CNS); **(7)** Divyesh Kothari; **(8)** GEICO; **(9)** James Gonzalez; **(10)** Gregory Przybylski; **(11)** Hackensack University Medical Center; **(12)** Lindy Washburn; **(13)** Marc Cohen, MD; **(14)** North Jersey Media Group (now “Fourth Edition”); **(15)** Peter Staats, MD; **(16)** Robert Garrett; **(17)** Robert Heary, MD; **(18)** Lewis Stein, Esq; **(19)** Thomas Peterson, MD; **(20)** University Hospital; **(21)** William Mitchell, MD; **(22)** TD Bank, NA

## Relief Sought

Petitioner Richard Arjun Kaul, MD (“**Kaul**”) respectfully requests that this Court grant Kaul’s petition for a writ of mandamus and direct the district court to promptly adjudicate Kaul’s “**Letter seeking permission to submit twenty-two (22) motions for summary judgment.**” (K1-D.E. 434-2 Page ID 10970) (**Appendix X**).

## Issues Presented

That a grant of the petition in conjunction with the grant of Kaul’s application for medical licensure in Pennsylvania (07/13/20-K1-Third Circuit-Case: 19-3113) (**Appendix C**): **(i)** will expedite a **“Reformation of American Medical Boards” (“RAMBO”)**; **(ii)** that a **RAMBO** will mitigate the mortality/morbidity threat of any future COVID-19 like pandemics; **(iii)** that a **RAMBO** will eliminate state medical board corruption, which will reduce healthcare costs; **(iv)** that a RAMBO related reduction in healthcare costs will reduce the healthcare federal tax burden; **(v)** that a RAMBO will mitigate **“opiate epidemic”** related mortality/morbidity

## Standard of Review Under The All Writs Act

The All Writs Act, 28 U.S.C. §1651, authorizes the issuance of all writs necessary or appropriate in aid of the court’s jurisdiction. The power of an original panel of a United States Court of Appeals to grant relief enforcing and protecting the terms of its mandate is well established in the Supreme Court, this Circuit and other federal courts of appeal<sup>2</sup>.

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1. <sup>1</sup> FTC v. Dean Foods Co., 384 U.S. 597 (1966); US v. NY Tel. Co, 434 US 159 (1977); Cheney v. United States Dist. Court, 542 U.S. 367, 381 (2004); Citibank v. Fullum, 580 F.2d 82 (3d Cir. 1978); US v. Wexler, 31

For example, in Citibank v. Fullum, this Court noted that: **“Despite federal appellate courts’ general reluctance to grant writs of mandamus ...The Supreme Court has repeatedly held that an appellate court has jurisdiction under U.S.C. §1651 to issue a writ of mandamus to compel an inferior court to comply<sup>3</sup>”**. To obtain a writ of mandamus in the Supreme Circuit, a party must show **(i)** a grant is in the public interest; **(ii)** there exist extraordinary/exceptional facts/circumstances that warrant a writ; **(iii)** there exists no other form of relief

## **Statements + Facts Necessary To Understand Petition**

### **Statements**

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F3d 117 (3d Cir. 1995); US v. Apple MacPro Computer, 851 F3d 238 (3d Cir. 2017); City of Cleveland v. FPC, 561 F.2d 344, 346 (D.C. Cir. 1977); ILGWU v. Donovan, 773 F2d 920 (D.C. Cir. 1984)(per curiam); PEPCO v. ICC, 702 F.2d 1026 (DC Cir. 1993); In re People’s Mojahedin Organization of Iran, 680 F.3d 832 (D.C. Cir. 2012); Iowa Util. Bd v. FCC, 135 F3d 535 (8<sup>th</sup> Cir. 1998) vacated on other grounds; In re FCC, 217 F.3d, 125 (2d Cir. 2000); Am. Trucking Assoc. v. ICC, 669 F2d 957 (5<sup>th</sup> Cir. 1982); In re March, 988 F.2d 498 (4<sup>th</sup> Cir. 1993)

2. 580 F.2d at 86-87 (citations omitted)



1. From April 29, 2016, the Defendants/District Court have through a **“pattern of racketeering”** perpetrated an illegal scheme to obstruct Kaul’s prosecution of **“The Kaul Cases”** by: **(i)** engaging in schemes of judicial corruption + bribery; **(ii)** denying/non-adjudication of every motion filed by Kaul; **(iii)** denying Kaul discovery; **(iv)** entering an order inconsistent with a prior order by denying Kaul’s application to lift the stay on K2; **(v)** illegally staying K2 + K3; **(vi)** illegally dismissing K1; **(vii)** willfully misinterpreting/misrepresenting the May 27, 2020 Opinion of the United States Court of Appeals for the Third Circuit; **(viii)** submitting to the record knowingly false opinions of fact and law, purposed to pervert/obstruct the course of justice; **(ix)** diverting documents filed in the court’s late-drop box; **(x)** converting the district court into a **“racketeering enterprise”**.

2. From April 29, 2016 the Defendants/District Court (NJ) have continued to obstruct justice. Since June 18, 2020, they have intensified their illegal scheme in the knowledge that Kaul has submitted evidence in K7, that proves corruption/gross negligence of state medical boards is directly responsible for COVID-19 related mortality and morbidity. They recognize that a grant of Kaul’s twenty-

two (22) motions for summary judgment in K1 will facilitate the emergence of claim conclusive evidence in **“The Kaul Cases”**.

### Facts

Kaul respectfully submits that the below evidence satisfies the elements necessary to grant a writ of mandamus: **(i)** a grant is in the public interest; **(ii)** there exist extraordinary/exceptional facts/circumstances that warrant a writ; **(iii)** there exists no other form of relief, because the district court (NJ) in **“The Kaul Cases”** cases has become interminably corrupted by the Defendants massive schemes of bribery and judicial corruption. Kaul respectfully asserts that the facts below will facilitate this Court’s understanding as to why Kaul has submitted this writ of mandamus, and why this Court should grant the writ. Kaul has indicated next to each fact, which element of a writ petition it proves: **(i)** public interest **(PI)**; **(ii)** extraordinary **(EX)**; **(iii)** no alternative **(NA)**.

1. August 1, 2019: K5–ADMISSIONS OF FACT BY ALL STATE MEDICAL BOARDS (D.E. 1-2 Page 1 to 165) (EX + PI) (Appendix A-Sections 3 to 6-Sample PA/NJ/OR/KS) – State medical boards/national mechanism of physician regulation continue to remain

illegally constituted: 2. September 9, 2019: K1-United States Supreme Court-Petition for writ of mandamus-19-5873 (Appendix B) (EX + NA) – Kaul respectfully refers the Court to the September 9, 2019 petition for the simple purpose of recitation of fact relevant to the November 3, 2020 petition. The former cites to fact from February 11, 2019 to August 19, 2019: 3. September 6, 2019: “The Kaul Cases” – Letter from Kaul to K7 Defendant Roeder (07/13/20-K1-Third Circuit-Case No. 19-3113-Document: 59 Page 5) (Appendix C) (EX) – Kaul noticed Defendant Roeder that unless Defendant NJBME reinstated his illegally revoked license (March 12, 2014), he would initiate legal action against Roeder. On June 18, 2020 Kaul filed K7, in which Defendant Roeder is accused, amongst other things, of racketeering. On September 9, 2020, a Kaul family member was diagnosed with COVID-19, became quarantined and suffered from fever/respiratory symptoms. Process of service on the K7 Defendants commenced on October 16, 2020: 4. February 28, 2020: K2 – Order of District of New Jersey (D.E. 103 Page ID 1854) (Appendix D) (EX) - U.S.M.J. Dickson denied Kaul’s motion to lift the stay on K2 (08/12/19-D.E. 84) (Appendix S), seven (7) months after it had been filed. K2 is

evidentially/factually/legally distinct from K1 (09/06/18-K2-D.E. 46) **(Appendix T)**. Despite these differences the district court stayed K2 (10/02/18-K2-D.E. 58) **(Appendix U)**. On February 28, 2020 Magistrate Judge Dickson denied Kaul’s motion, and as further evidence of the Defendants corruption of the district court, on August 5, 2020, Dickson issue a knowingly false opinion/order that stayed Kaul’s prosecution of K3 (08/05/20-K3-D.E. 48) **(Appendix E)**. K1/K2/K3 are evidentially/factually/legally distinct from one another, and thus there exists no basis to enact the “**extraordinary**” (08/05/20-K3-D.E. 48 Page ID 746) **(Appendix E)** step of staying these cases. K2 + K3 have been stayed because the Defendants have corrupted the district court (NJ), in exactly the same manner as they corrupted the United States Bankruptcy Court for the District of New Jersey (09/21/18-K4-D.E. 1) **(Appendix F)**: **5.** April 23, 2020: K7-District Court (DC)-ADMISSIONS OF FACT by Defendant NJBME (06/18/20-K7-D.E. 1-1) (Appendix G) (PI + EX) - “We accept that our willfully gross negligence is directly responsible for the morbidity and mortality caused to the American public by the COVID-19 virus...”: **6.** May 27, 2020: K1-Order of United States

**(Appendix H) (EX + NA)** – Case remanded to the district court (NJ) for lack of appellate jurisdiction. The Defendants’ corruption of the district court (NJ) is protracting the prosecution of “**The Kaul Cases**” at the expense of the American tax-payor and the budget of the United States District Court/Federal Judiciary. The Defendants illegal diversion of tax monies is depriving COVID-19 patients of life-saving care: **7. June 19, 2020: K1 – Motions for Summary Judgment against all twenty-two (22) Defendants (D.E. 406 to 428) (Appendix I) (PI) – Memorandum + Plaintiff Certification + Order + Declaration for Defendant North Jersey Media Group not published to the docket. The Defendants have caused certain members of the district court (NJ) to divert Kaul’s submissions, in order to constrict the evidentiary foundation for appeal and obstruct justice: 8. June 24, 2020: K1 – Letter from Kaul to Honorable D. Brooks Smith re: pending twenty-two (22) motions Summary Judgment (Third Circuit-Case 19-3113 Document 59) (Appendix C) (EX + PI) – Kaul informed the Third Circuit that on May 27, 2020 the State of Pennsylvania granted Kaul’s application for medical licensure, and he expressed his “hope” that the**

district court (NJ) grant his twenty-two (22) motions for summary judgment (06/19/20-K1-D.E. 406 to 428) (**Appendix I**). Kaul enclosed a copy of the September 6, 2019 letter he sent to K7 Defendant Roeder (Third Circuit-Case 19-3113 Document 59 Page 5) (**Appendix C**). The district court denied without prejudice Kaul's twenty-two (22) motions for Summary Judgment (07/01/20-K1-District Court-D.E. 430) (**Appendix P**). **9. June 29, 2020: K1 – Supplemental exhibits (D.E. 429) (Appendices L to V) (EX + PI + NA)** – Kaul alerted federal authorities to the Defendants corruption of certain judges in the district court (NJ). The Defendants corruption of the district court (NJ) is the reason it continues to obstruct Kaul's prosecution of K1, by willfully failing to adjudicate either the motions for summary judgment (06/19/20-D.E. 406 to 428) (**Appendix I**) or grant letters seeking permission to submit twenty-two (22) motions for Summary Judgment (08/31/20-D.E. 447) (**Appendix K**). The supplemental exhibits evidence the Defendants' corruption/conversion of the district court into a “**racketeering enterprise**”, but Kaul respectfully brings the attention of this Court to three (3) of the most incriminating pieces of evidence: **(i) D.E. 429-2 Page ID 10619 to Page ID 10629 (Appendix L)**

- **“The Martinotti Misrepresentations”**; (ii) D.E. 429-3 Page ID 10652 (Appendix M) – **“The Dickson Admissions of Corruption”**; (iii) D.E. 429-3 Page ID 10707 (Appendix N) - **“The Vazquez Admissions of Corruption”**. Relevant to the proof of the **“extraordinary”** element of a writ petition, United States Magistrate Judge Joseph Dickson on February 28, 2020 did admit that the circumstances of K1/K2 are **“extraordinary”** (02/28/20-K2-D.E. 102 Page ID 1851) (**Appendix O**) in denying without prejudice Kaul’s application to lift the stay on K2. It would appear, that according to Judge Dickson, **“The Kaul Cases”** have met the **“extraordinary”** standard required for a writ of mandamus: **10. July 1, 2020: K1 – Order (D.E. 430 Page ID 10773) (Appendix P) (EX + NA + PI)** – Within only **two (2)** days of Kaul filing the motions for summary judgment, the district court denied the motions without prejudice. The fact that the district court did NOT previously require Kaul to submit a letter for leave to file on **May 29, 2019** (K1-D.E. 343 to D.E. 368) (**Appendix Q**) evidences the court’s corrupted state-of-mind, in that it had predetermined it would not adjudicate the motions and risk reversal on appeal, but would instead make moot/administratively

terminate them. Similarly, the Defendants conspired with the district court to not submit opposition to the motions, in the knowledge that the court was corrupted and would adopt the Defendants order to administratively terminate the motions. The Defendants control the district court in K1/K2/K3/K4/P1/P2, which explains why they moved to have K5 transferred from the United States District Court for the District of Columbia to the District of New Jersey (01/27/20-K5-D.E. 47-1) (**Appendix R**): **“THE COURT SHOULD TRANSFER ... greater interest in resolving this action than do the citizens of the District of Columbia.”** (Page 24-25 of 46). The **“greater interest”** pertains to the Defendants knowledge that it controls the district court (NJ), where it would, had K5 been transferred, order the court to obstruct Kaul’s prosecution of the case to perpetuate their ‘cover-up’ of their grand schemes of judicial corruption/conversion of the State of New Jersey/All courts within its geographic boundaries into **“racketeering enterprises”**. The District of Columbia has not transferred the case sua ponte to the District of New Jersey, as did the S.D.N.Y. in K1/K2/K3. The issuance of summary judgments in K1 will facilitate a global resolution of **‘The Kaul Cases’** and in the words of



U.S.M.J. Dickson, “**educate the District Court on how best to proceed**” (02/28/20-K2-D.E. 102 Page ID 1852) (**Appendix O**). Kaul respectfully asserts however, that more than the legal force of a superior court order might be required to compel obedience in the district court (NJ), of both certain judges and their political masters/puppeteers. The latter being the Defendants. Kaul respectfully moves this Court to refer the Defendants to the Criminal Division of the United States Department of Justice: **“The Court notes that the United States Court of Appeals for the Third Circuit denied Plaintiff’s appeal in Kaul 1 [K1] ... In this Court’s opinion, however, that does not moot Defendants’ application.”** (08/05/20-K3-D.E. 48 Page ID 744) (**Appendix E**). The district court’s willful misinterpretation of the Third Circuit’s order satisfies the requisite **“extraordinary/no alternative”** elements necessary for the grant of a writ: **11. July 17, 2020: K1 – ADMISSIONS BY DEFENDANTS OF UNDISPUTED FACTS (D.E. 434-5 Page ID 10981 to 434-24 Page ID 11155) (Appendix W) (PI) – “I have no defense to the arguments submitted by Kaul in his motions for the entry of summary judgment ...”: 12. July 17, 2020: K1 - Letter seeking permission to**

submit twenty-two (22) motions for summary judgment (D.E. 434-2 Page ID 10970) (**Appendix AN**) (EX + PI) – As of October 22, 2020, the district court has failed to address Kaul’s submission for permission, a period of ninety-four (94) days. A period that is arbitrary and violates Kaul’s constitutionally protected right to due process. A period that is currently forty-eight (48) times as long as the time within which the district court dismissed without prejudice Kaul’s twenty-two (22) motions for summary judgment (07/01/20-K1-District Court-D.E. 430) (**Appendix P**): 13. July 27, 2020: K1 – Kaul Opposition to Defendants Allstate/Crist/Mitchell/Heary/Geico/NJMG/Washburn petition re: All Writs Injunction (D.E. 434 Page ID 10966 + D.E. 434-1 Page ID 10969 + D.E. 438-Page ID 11166 to D.E. 440 Page ID 11183) (**Appendix Y**) (EX + PI) – Defendants Geico/ NJMG + Washburn/Allstate + Crist/Mitchell/Heary (D.E. 431/432+435/433/436/437) (**Appendix Z**) submitted All Writs applications seeking to ‘shut-down’ their prosecution by Kaul. The Defendants have populated the records of “**The Kaul Cases**” with the fraudulent opinion of K2/K5 Defendant/New Jersey Administrative Law Judge, Jay Howard Solomon. This document resulted in the illegal

revocation of Kaul's license on March 12, 2014, and is a document that the Defendants know and the evidence proves (01/17/18-K1-D.E. 225) (**Appendix AA**) is a fraudulent legal instrument. The Defendants know this constitutes the felonies of mail/wire fraud, an **“extraordinary”** set of circumstances, which explains why the district court has failed to adjudicate Kaul's letters seeking permission to file motions for summary judgment (08/31/20-D.E. 447 Page ID 11262) (**Appendix K**). The record in this case proves that Kaul has no alternative remedy but the enforcement of a writ. A grant of the summary judgments is in the public interest: **“ ... thousands of members of the American medical profession ...”** (07/31/20-K1-Third Circuit-D.E. 59) (**Appendix C**). Kaul submitted opposition papers to the Defendants All Writs applications (D.E. 434 + 434-1 + 438 + D.E. 439 + D.E. 440) (**Appendix Y**). In D.E. 440 Kaul states: **“The District of New Jersey will be strained to deliver impartial justice because of the politico-legal nexus between its judiciary and the defendant-appellees”** (Quote from 07/14/16-K1-Second Circuit-Case No. 16-1397 D.E. 41 Page 4 of 170) (**Appendix AB**). Within this 2<sup>nd</sup> Circuit submission Kaul also makes the

argument: **“It is in the public’s interest to have the matter venued in the SDNY ... minimally invasive spine surgery.”** (Page 4 of 170). In D.E. 438 Kaul states: **“Chris Christie cashes ... coronavirus ... Kaul’s application for permission to file twenty-two (22) motions for summary judgment be granted.”** (Page ID 11166-67). In D.E. 439 Kaul states: **“I write this letter ... state-orchestrated acts ... retaliation ... Marc Cohen for obstruction of justice ... On May 27, 2020, the United States Court of Appeals for the Third Circuit issued a defining directive ... “Confusion and conflict enter. Justice, truth and peace emerge.” Anon. circa 1777.”** These are **“extraordinary”** circumstances. Kaul states: **“Kaul respectfully moves this Court to: (i) deny Defendant Mitchell’s motion; (ii) grant Kaul’s request for permission to file twenty-two (22) motions for Summary Judgment.”** (07/30/20-K1-D.E. 439 Page ID 11182). The district court continues to fail to adjudicate the permission letter. Kaul has no alternative but a writ. Kaul states: **“Despite the disqualification of two federal judges ... Grant Kaul’s request for permission to file twenty-two (22) motions for Summary**

**Judgment.**” (07/30/20-K1-D.E. 440 Page ID 11184). Kaul has no alternative but a writ. The recalcitrance of the district court is similarly evidenced in K4, in which despite Kaul’s multiple applications to the bankruptcy/district courts in New Jersey, his motion (11/08/18-K4-18-CV-01489-D.E. 9) (**Appendix AF-Section 2**) to have an order of dismissal vacated/appeal of the dismissal adjudicated, the courts continued to obstruct his prosecution of K4: “ ... **dismissed without prejudice pending the disposition of the pending motion to vacate in the Bankruptcy Court.**” (07/19/19-K4-18-CV-16485-D.E. 11 Page 556) (**Appendix AF-Section 10**).

At this point in the petition, Kaul submits evidence of a massive ‘Fraud on the Court’, committed to a criminal standard, by Defendant Stolz (K2/K4/K5) in collusion/conspiracy with Defendants Allstate/Geico/NJBME/Christie (K1/K2/K3/K5/K7/P1/P2) + The State of New Jersey/Judge John Sherwood, perpetrated in and against The United States Supreme Court/The United States Court of Appeals for the Third Circuit/The United States Court of Appeals for the Second Circuit/The United States District Court for the District of New Jersey/The United States Bankruptcy Court for the District of New

Jersey/The United States District Court for the District of Columbia.

For ease of reference these events are titled as: **“Stolen By Stolz”** –

**The Stolz Thread (EX + PI + NA) (Appendix AF):** **A.** 11/07/18-K4-Bankruptcy Court-18-01489-D.E. 7: JKS – Order of dismissal of Adversary Action. **B.** 11/08/18-K4-Bankruptcy Court-18-01489-D.E. 9 – Kaul motion to vacate order of dismissal. **C.** 11/13/18-K4-Bankruptcy Court-18-01489-D.E. 10 – Kaul letter to Chief Judge Ferguson re: judicial re-assignment. **D.** 11/30/18-K4-District Court-18-CV-16485-D.E. 1: MCA – Notice of Appeal to the District Court. **E.** 12/17/18-K4-District Court-18-CV-16485-D.E. - Defendant Stolz motion re: dismissal of Kaul appeal. **F.** 01/03/19-K4-District Court-18-CV-16485-D.E. 6 – Kaul opposition to Defendant Stolz motion re: appeal dismissal. **G.** 01/04/19-K4-District Court-18-CV-16485-D.E. 4 – Defendant Stolz response to Kaul opposition to Defendant Stolz motion re: appeal dismissal. **H.** 01/08/19-K4-Bankruptcy Court-18-01489 – The court committed a ‘Fraud on the Court’ by entering a knowingly false statement: **“Minute of Hearing Held, OUTCOME: Joint scheduling order submitted (related document(s); 3 Summons Issued) ...”** NO HEARING WAS HELD AND NO SCHEDULING

ORDER WAS SUBMITTED. I. 04/10/19-K4-District Court-18-CV-16485-D.E. 8 – Kaul letter to District Judge Arleo re: adjudication of appeal. J. 06/13/19-K4-Third Circuit Appeals Court-Case No. 19-2375-D.E. 1 – Kaul petition for writ of mandamus re: district court adjudication of appeal of order of dismissal of Kaul adversary action against Defendant Stolz. K. 07/19/19-K4-District Court-18-CV-16485-D.E.11 – Order denying Defendant Stolz’s motion to dismiss + Order dismissing Kaul appeal **“without prejudice pending the disposition of the pending motion to vacate in the Bankruptcy Court”**. L. 07/31/19-K4-District Court-18-CV-16485-D.E. 12 – Admissions of fact pertaining to the transmission/exchange of information/monies between Judge Martinotti and the defendants. M. 09/27/19-K4-Third Circuit Appeals Court-Case No. 19-2375-D.E. 7 – Denial of writ of mandamus. N. 10/08/19-K4-Third Circuit Appeals Court-Case No. 19-2375-D.E. 8 – Kaul petition for rehearing of denial of writ of mandamus. O. 10/31/19-K4-Third Circuit Appeals Court-Case No. 19-2375-D.E. 9 – Denial of sur petition for rehearing. P. 12/11/19-K5-District Court (D.C.)-19-CV-3050 – Defendant Stolz was served with the Summons + Complaint. Q. 01/09/20-K9-Bankruptcy Court-20-

01011-D.E. 647-JKS - Defendant Stolz filed a VERIFIED ADVERSARY COMPLAINT TO PERMANENTLY ENJOIN THE DEFENDANT FROM PURSUING ANY AND ALL CLAIMS AGAINST DANIEL M. STOLZ, ESQ., COUNSEL TO THE CHAPTER 7 TRUSTEE. **R.**

01/23/20-K4-Bankruptcy Court-18-01489 – Judge John

Sherwood/Defendant Stolz/Allstate/Geico/TD/United States

Bankruptcy Court for the District of New Jersey committed a massive ‘Fraud on the Court’ by closing adversary case (18-01489), **IN ORDER**

**TO INTENTIONALLY AVOID ADJUDICATING KAUL’S**

**MOTION TO VACATE ORDER OF DISMISSAL OF THE**

**ADVERSARY CASE (11/08/18-K4-D.E. 9)**. This premeditated act,

part of a “**pattern of racketeering**”, constitutes an element of a racketeering conspiracy conducted through the bankruptcy court,

which Defendants Stolz/Allstate/Geico/TD converted into a

racketeering enterprise in collusion/conspiracy with John Sherwood, A

conspiracy that involved multiple private meetings in his judicial

chambers. The case was closed only **AFTER** Defendant Stolz was

served in K5, a case in the District of Columbia, a jurisdiction in which

the Defendants at that time had no/minimal influence. The Defendants



recognized that Stolz's legal exposure in K5 would expose them and the crimes they had committed in administrative/state/bankruptcy/federal courts within the geographic boundaries of New Jersey from 2006 to the present, and thus they had Sherwood issue a legal instrument i.e. injunctive order (02/10/20-K9-20-01011-D.E. 8) that Sherwood knew was fraudulent and was purposed to conceal the Defendants crimes from exposure in K5. Defendant Stolz subsequently submitted the knowingly illegal order onto the court docket in K5 (07/30/20-K5-19-CV-3050-D.E. 132 Page 5 of 11) and thus did knowingly/intentionally commit another 'Fraud on the Court' and perpetuate/extend the Defendants **"pattern of racketeering"** into the United States District Court for the District of Columbia. S. 01/31/20-K9-Bankruptcy Court-20-01011-D.E. 7-JKS – Kaul submitted opposition papers: **" ... this Court has no legal authority to ... obstruct justice ... unhinged ... criminal acts ... in administrative, state, bankruptcy and federal courts within the geographic boundaries of New Jersey."** T. 02/10/20-K9-Bankruptcy Court-20-01011-D.E. 8-JKS – John Sherwood entered onto the docket of the United States Bankruptcy Court for the District of New Jersey an Order

**“DEFENDANT [KAUL] FROM PURSUING CLAIMS AGAINST DANIEL M. STOLZ, ESQ.”**, that he knew was the product of racketeering and that would be used to perpetuate a racketeering scheme in the US federal court system and had the potential to convert the entire US federal court system into a **“racketeering enterprise”**, through which the Defendants would continue to commit a massive ‘Fraud on the Court’ through a **“pattern of racketeering/bribery/judicial corruption/political corruption”**. Defendants Allstate/Geico were the principal architects of this scheme, and are currently orchestrating similar schemes (**“pattern”**) in the DNJ against other healthcare providers. U. 02/12/20-K9-Bankruptcy Court-20-01011-D.E. 9 – The Defendants/John Sherwood used the US mail and wire to transmit a knowingly fraudulent legal instrument in furtherance of their fourteen (14) year scheme of **“racketeering”**: **“Notice by first class mail ... Notice by electronic transmission ...”** Defendant Stolz, in a futile attempt to avoid a criminal charge of wire fraud, did not, as was his custom, email Kaul a copy of Sherwood’s illegal order, a fact that evidences his guilty state-of-mind. V. 04/07/20-K9-Bankruptcy Court-20-01011 – Sherwood closed the case almost as

soon as the period for appeal had expired. Sherwood closed K4 on January 23, 2020, without adjudicating Kaul's motion to vacate the order of dismissal (11/08/18-K4-D.E. 9), as required by law and consistent with the order of the district court (07/19/19-K4-D.E. 18). The Defendants/Sherwood closed K4 in an attempt to foreclose Kaul from petitioning superior courts for a writ of mandamus, and thus committed a 'Fraud on the Court' in the United States District Court for the District of New Jersey/United States Court of Appeals for the Third Circuit/United States Supreme Court. **W.** 07/24/20-K5-District Court (DC)-19-CV-3050 – Defendant Stolz was served on December 20, 2019 and failed to answer or otherwise plead. Kaul moved for default (07/24/20-K5-D.E. 120 Page 2 of 30), which was entered (07/24/20-K5-D.E. 131). **X.** 07/30/20-K5-District Court (DC)-19-CV-3050-D.E.132 - Defendant Stolz filed a **“DECLARATION IN OPPOSITION TO REQUEST FOR ENTRY OF DEFAULT AND REQUESTING DISMISSAL AGAINST DANIEL STOLZ WITH PREJUDICE”**. Defendant Stolz submitted a knowingly fraudulent legal instrument, that of Sherwood's order (02/10/20-K9-Bankruptcy Court-D.E. 8), that Stolz knew was the product of a massive crime orchestrated, by the

State of New Jersey/Defendants (2006 to 2020). Y. 09/17/20-K5-District Court (DC) – Defendant Stolz’s ‘Fraud on the Court’ caused the Court to enter a FOX NEAL order mandating Kaul explain **“why the court should not impose sanctions for failing to dismiss the claims against Stolz once Bankruptcy Judge Sherwood entered the permanent injunction order on February 10, 2020”**. Kaul submitted a letter/brief on October 2, 2020 (Appendix AF-Section 26). It was sent via Federal Express and signed for in the court on October 6, 2020. As of November 3, 2020, it has still not been posted to the docket, as is the case with at least seven (7) other submissions that Kaul has filed since the initiation of the case on October 1, 2019. In order to ensure the court did not adopt Defendant Stolz’s knowingly fraudulent legal instrument and enter a punitive order against Kaul, potentially prejudicing any appeals that might follow from such an order, Kaul submitted an eight (8) page letter/brief with six hundred and sixty-four (664) pages of **IRREFUTABLE EVIDENCE** that **“proves the guilt of Defendant Stolz as to the charges levied against him in K5.”** This conclusive body of evidence remains absent from the court docket and Defendant Stolz remains in default. A grant

of default judgment against Defendant Stolz in K5 will, as with a grant of the twenty-two (22) summary judgment motions in K1, facilitate a global resolution of “**The Kaul Cases**”. The United States Department of Justice is aware of these “**extraordinary**” circumstances: “**I believe that certain judges ... bribery, and “patterns of racketeering” ... racketeering enterprise.**” (07/31/20-K5-District Court (DC)-D.E. 134-2). **14.** **07/30/20-K5-District Court (DC)-D.E. 132 (Appendix AF-Section 25)** – The submission by Defendant Stolz of a knowingly fraudulent order (Page ID 8 of 11) has decimated his credibility, and that of all other Defendants, pursuant to the RICO doctrine of vicarious liability. The Defendants/District court (NJ) argue/find that K1/K2/K3 are: “ **... essentially the same case .. functionally identical in both matters.**” (08/05/20-K3-District Court(NJ)-D.E. 48 Page ID 747) (**Appendix E**) (Dickson’s qualifying use of the word “**functionally**” evidences his corrupted state-of-mind and his realization that there exists no legitimate/legal basis to stay K3). Thus: **(i)** the Defendants are defenseless because they lack credibility; **(ii)** “**The Kaul Cases**” evidence is claim conclusive/irrefutable; **(iii)** the Defendants will continue to be subject

to Kaul’s claims for damages for “**new racketeering injuries**”, every time a state medical board either denies his application for licensure or fails to issue one within a specified period of time consistent with the due process clauses of the United States Constitution (state medical boards arbitrarily/capriciously delay/obstruct applications for new licenses/reinstatements despite the fact that the severe national shortage of physicians has deprived COVID-19 patients of life-saving care, a deprivation responsible for many unnecessary deaths – the less medical care/physicians available, the more billions reaped by insurance executives/shareholders). Kaul has invited every state medical board to issue him a license, e.g. Connecticut (**Appendix AG-Section 2**); (iv) the market capitalization of Defendants Allstate/TD/Geico (Berkshire Hathaway) will continue to decrease as “**new racketeering injuries**” claims are filed; (v) hospital systems in which medical board members practice medicine will become subject to litigation as Kaul files these claims (**Appendix AJ-Section 2 + 3**). “**The Kaul Cases**” Defendants were forewarned on June 13, 2012 by Kaul’s then lawyer, Robert Conroy: “**As a practical matter, you will be sewing [sic] the seeds of absolute and utter chaos, and you’ll**

reap the whirlwind as a result.” (K1-D.E. 179-1 Page ID 2607) (Appendix AK-Section 2). Despite this warning, New Jersey Deputy Attorney General, Sandra Dick, lied to the court record and participated in the Defendants “**pattern of racketeering**”, in which they converted the State of New Jersey into a massive “**racketeering enterprise**”, an illegal scheme orchestrated by Defendants Christie/Allstate/Geico over a period that commenced in at least 2008/9. Dick committed perjury: “**Based on the record before us ... We encourage the parties to agree to an accelerated proceeding of this matter at the Office of Administrative Law.**” (K1-D.E. 179-1 Page ID 2611) (Appendix AK-Section 2). The record from 2012 to the present in administrative/state/bankruptcy/federal courts within the geographic boundaries of New Jersey contains evidence sufficient for the three requisite elements for the grant of a writ of mandamus. Absent the writ, the Defendants/State of New Jersey/NJ Courts will persist in their massive ‘cover-up’ of their massive crimes (K5-D.E. 1-2 + 06/18/20-K7-D.E. 1-1) (Appendix AL-Section 2), continue their obstruction of justice, suppress the emergence of truth and by obstructing the prosecution of “**The Kaul Cases**” will prevent a

“**RAMBO**” a change that will eradicate the corruption responsible for the gross negligence associated with the world’s highest COVID-19 related mortality rate (06/18/20-K7-D.E. 1-1) (**Appendix G**). A

“**RAMBO**” will more readily “**protect the public**” from future viral pandemics and Kaul’s prosecution of K5/K7 will more likely succeed if his twenty-two (22) motions for summary judgment in K1 are granted, the legal precursor of which is the grant of the “**Letter seeking permission to submit twenty-two (22) motions for summary judgment**” (K1-D.E. 434-2 Page ID 10970) (**Appendix X**). **15.**

08/14/20-K1-District Court (NJ)-Letter from Kaul to the District Court-D.E. 441 (**Appendix AO**) – The Defendants failed to respond to Kaul’s letter seeking permission to file twenty-two (22) motions for summary judgment, and as of October 22, 2020, the district court has failed to adjudicate the letter: **16.** 08/17/20-K1-District Court (NJ)-Kaul

application for ASSET SEIZURE WARRANT FOR DEFENDANT

ANDREW GREGORY KAUFMAN AND HIS WIFE-D.E. 443

(**Appendix AP**) - “**DEFENDANT ANDREW GREGORY**

**KAUFMAN AND HIS WIFE have been instructed by their**

**counsel to fraudulently conceal their assets ... KAUFMAN**



**provided false tax statements.”** The district court failed to adjudicate Kaul’s application: 17. 08/19/20-K1-District Court (NJ)-Kaul response to State of New Jersey Attorney General response to Kaul application for ASSET SEIZURE WARRANT-D.E. 445 (Appendix AS) -“... **Defendant Kaufman’s grand scheme of tax evasion + political corruption + bribery + racketeering + racism ... the Defendants have admitted to the facts of the application ...**” 18. 08/29/20-K1-District Court (NJ)-Fraud on the Court by Defendant Kaufman + Ellen Wachs Kaufman + Grant of letters seeking permission to submit twenty-two (22) motions for Summary Judgment-D.E. 447 (Appendix K) - As of October 22, 2020 the district court has failed to adjudicate Kaul’s application or publish to the docket further evidence submitted by Kaul, of the Defendants’ fourteen (14) year-long ‘Fraud on the Court’ (Appendix K). 19. 12/16/19 to 09/23/20-K5-District Court (DC)-D.E. 120 to D.E. 148 + MINUTE ORDERS 9/23/20 (EX + NA) - The following litigation threads constitute evidence in support of a writ: 1. STOLZ: (i) 12/20/19-Service of summons/complaint (D.E. 119); (ii) 07/24/20-Kaul motion for default (D.E. 120-Page 2 of 30). Proof of service filed by Kaul but **not**

**published** to docket; (iii) 07/24/20-DEFAULT ENTERED (D.E. 131); (iv) 07/30/20-Declaration in opposition to request for entry of default and requesting dismissal against Daniel Stolz [Defendant] with prejudice (D.E. 132 + 133); (v) 09/17/20-FOX NEAL ORDER re: sanctions against Kaul (D.E. 146); (vi) 10/06/20-Kaul response to FOX NEAL ORDER Submitted on 10/06/20 but **not published**: 2.

**PRZYBYLSKI**: (i) 12/17/19-Service of summons/complaint (D.E. 120 Page 8 of 30); (ii) 07/24/20-Kaul motion for default (D.E. 120 Page 5 of 30); (iii) 07/28/20-DEFAULT ENTERED (D.E. 122); (iv) 08/24/20-Kaul motion for default judgment (D.E. 142); (v) 08/28/20-MINUTE ORDER re: motion for default judgment denied: 3. **STEIN**: (i) 12/16/19-Service of summons/complaint (D.E. 118 Page 1 of 1); (ii) 07/24/20-Kaul motion for default. Submitted on 07/24/20 but **not published**, except for proof of service (at least 7 Kaul submissions **not published**). **DEFAULT NOT ENTERED**; (iii) 08/17/20-Kaul motion for default published; (iv) 08/21/20-MINUTE ORDER re: motion for default denied: 4.

**METZGER**: (i) 12/20/19-Service of summons/complaint (D.E. 120 Page 12 of 30); (ii) 07/24/20-Kaul motion for default (D.E. 120 Page 9 of 30); (iii) 07/28/20-DEFAULT ENTERED (D.E. 123); (iv) 08/24/20-Kaul

motion for default judgment (D.E. 143); (v) 08/28/20-MINUTE ORDER re: motion for default judgment denied: 5. **MARTINOTTI**: (i) 12/16/19-Service of summons/complaint (D.E. 120 Page 17 of 30); (ii) 07/24/20-Motion for default (D.E. 120 Page 14 of 30); (iii) 07/28/20-DEFAULT ENTERED (D.E. 121); (iv) 07/29/20-Notice to Court regarding process of service (D.E. 128): 6. **SOLOMON**: (i) 12/19/19-Service of summons/complaint (D.E. 120 Page 21 of 30); (ii) 07/24/20-Motion for default (D.E. 120 Page 18 of 30); (iii) 07/28/20-DEFAULT ENTERED (D.E. 124); (iv) 08/24/20-Kaul motion for default judgment (D.E. 141). Order sheet **not published**. **Note**: Court denied without prejudice D.E. 138 because Order sheet purportedly not included; (v) 08/28/20-MINUTE ORDER re: motion for default judgment denied; (vi) 09/17/20-Kaul motion for default judgment w/order sheet (D.E. 147); (vii) 09/23/20-MINUTE ORDER re: motion for default judgment denied: 7. **LOMAZOW**: (i) 12/17/19-Service of summons/complaint (D.E. 120 Page 27 of 30); (ii) 07/24/20-Motion for default (D.E. 120 Page 26 of 30); (iii) 07/28/20-DEFAULT ENTERED (D.E. 122); (iv) 08/24/20-Motion for default judgment (D.E. 143); (v) 08/28/20-MINUTE ORDER re: motion for default judgment denied: 8. **FEDERATION OF STATE**

**MEDICAL BOARDS:** (i) 12/16/19-Service of summons/complaint (D.E. 120 Page 25 of 30); (ii) 07/24/20-Motion for default (D.E. 120 Page 22 of 30); (iii) 07/28/20-DEFAULT ENTERED (D.E. 121); (iv) 07/29/20-Notice of appearance (D.E. 125); (v) 07/29/20-Motion to set aside default (D.E. 127); (vi) 08/05/20-Notice of appearance (D.E. 135); (vii) 08/21/20-FOX NEAL ORDER re: Kaul response to motion to set aside default (D.E. 139); (viii) 08/24/20-Denial of Plaintiffs request for summons to FSMB (D.E. 140); (ix) 09/09/20-Kaul response to motion to set aside default but **not published**.

**Re: Defendants – PRZYBYLSKI + METZGER + SOLOMON +**

**LOMAZOW:** Based on the above facts, the law mandates either an order compelling answers within twenty-one (21) days or an entry of default judgment. The district court (DC) ordered neither. The grant of a writ in K1 will mitigate the effects of this legal omission/error.

### **Reasons For Granting The Writ**

**1. Kaul respectfully asserts that the grant of a writ will: (i) cause a “RAMBO” and will: (ii) expose the specific details of a ‘Fraud on the Court’ committed by the Defendants and certain District Court (NJ) judges.**

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FILED

2021 JAN 11 AM 8:20

**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF TEXAS**

DEPUTY CLERK



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RICHARD ARJUN KAUL, MD

Civil Case:

v.

Complaint

FEDERATION OF STATE MEDICAL  
BOARDS ET AL.

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**3 - 21 CV 0060 - S**

I, the Propria Persona Plaintiff, Richard Arjun Kaul, of full age do hereby submit this  
Complaint on January 4, 2021 seeking the within referenced relief.

Dated: January 3, 2021



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Richard Arjun Kaul, MD

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS**

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RICHARD ARJUN KAUL, MD

Civil Case

Plaintiff

v.

**CERTIFICATE OF  
SERVICE ON ALL  
DEFENDANTS**

FEDERATION OF STATE MEDICAL BOARDS, ET AL.

Defendants

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I, Richard Arjun Kaul, MD, do hereby certify the following:

1. I have submitted an application for IFP status, and respectfully request that the U.S.M.S. do serve the Summons/Complaint on the Defendants.
2. In order to save the Court's resources, I did, on January 7, 2021 request that by January 12, 2021 the Defendants sign Form AO 399 (WAIVER OF THE SERVICE OF SUMMONS).

I do certify that on January 13, 2021, I will submit to the Court a list of those Defendants who have refused to waive service, and respectfully repeat my request that service be effectuated by the U.S.M.S. and the Defendants be penalized with the associated costs/sanctions.

Dated: January 7, 2021

  
\_\_\_\_\_  
Richard Arjun Kaul, MD

cc: All Defendants

## **Jurisdiction + Venue**

U.S.C. section 1331 because Plaintiff's claims arise under federal law, and under 18 U.S.C. section 1964(c) because this action alleges violations of RICO, 18 U.S.C. section 1962. This Court has subject matter jurisdiction pursuant to 28 U.S.C. section 1337 because this action alleges violations of an Act of Congress regulating commerce or protecting trade and commerce against restraints and monopolies. This Court also has subject matter jurisdiction over this action pursuant to 28 U.S.C. section 1332(d)(2)(A)(4) because Plaintiff is a citizen of a different state to the Defendants and the aggregate amount in controversy exceeds seventy-five thousand (\$75,000) dollars. This Court also has jurisdiction because the District of New Jersey is both a defendant, and an adversary in the United States Court of Appeals for the Third Circuit.

**Personal Jurisdiction:** This Court has personal jurisdiction over each Defendant. Each Defendant has transacted business, maintained substantial contacts and or committed overt acts using the US mail/wires in furtherance of the illegal scheme and conspiracy throughout the United States, including this district. This Court also has personal jurisdiction over all Defendants pursuant to Fed. R. Civ. P. 4(k)(1)(A) because they would be subject to the jurisdiction of a court of general jurisdiction in the Northern District of Texas.

**Venue:** Venue is appropriate in this District for Plaintiff's claims under 28 U.S.C. section 1391(b)(2), 18 U.S.C. section 1965(a) and 29 U.S.C. section 1132(e)(2), because Defendant Federation of State Medical Boards controls/directs/participates in the alleged conspiracies and is domiciled in the State of Texas.

## **Preliminary Statement**

This case involves the following Defendants whom the evidence proves have committed the stated crimes:

### **The Defendants:**

(1) FSMB; (2) Humuyan Choudry, MD; (3) Pennsylvania Medical Board; (4) Mark Woodland, MD; (5) New Jersey Board of Medical Examiners; (6) Scott Metzger, MD; (7) State of New Jersey; (8) Steven Sweeney; (9) United States District Court for the District of New Jersey (Newark); (10) Daniel Stolz, Esq; (11) Andrew Gregory Kaufman, MD; (12) Doreen Annette Hafner, Esq; (13) Ellen Wachs Kaufman; (14) Robert Francis Heary; (15) Jay Howard Solomon; (16) Cory Booker; (17) Charles Schumer; (18) Allstate Insurance Company; (19) Richard Crist; (20) Geico Insurance Company; (21) John Robertelli; (22) General Medical Council of the UK; (23) University of Pittsburgh.

### **The Crimes:**

(1) Racketeering; (2) Perjury; (3) Fraud; (4) Evidence/Witness Tampering; (5) Obstruction of Justice; (6) Public Corruption; (7) Judicial Corruption; (8) Bribery; (9) Kickbacks; (10) Manslaughter; (11) Conspiracy.

This case (K11-1) is brought to expose and dismantle the Defendants' decades long scheme of criminal violations of Kaul's basic human/constitutional rights, that have occurred in both the UK and US. The scheme extends from 2002 to 2021, and from 2012 has involved egregious and knowing breaches of Kaul's fundamental human rights, that include prolonged and ongoing rackets of obstruction of justice. The Defendants commission of crimes against Kaul commenced in 2002. Kaul initiated legal action against the Defendants in 2016 and from 2017 to 2020, his efforts to obtain a medical license in Pennsylvania, have his illegally revoked (March 24, 2014) NJ license reinstated and prosecute The Kaul Cases have been willfully, knowingly and illegally obstructed by the Defendants. The purpose of the Defendants obstruction is to 'cover-up' their crimes, as they know that Kaul's prosecution of The Kaul Cases will accelerate with monies earned from Kaul's future medical practice. The accelerated prosecution will expose their crimes and subject them to criminal prosecution and incarceration. The Defendants are fighting for their lives, albeit a losing battle. The question of their demise is now not "if" but simply "when".

Victory in this case will save lives, as it will publicly expose massive long standing schemes of corruption of certain sections/individuals of the American body politic, judiciary and state medical boards. The corruption of these fundamental pillars of



democratic society by ruthless for-profit corporations is responsible for the excessive COVID-19 related mortality/morbidity in the United States, as compared to other westernized democracies. This case brings together the worlds of medicine, business, law and politics at a historic moment in man's history. The main purpose of this case is to cause a "**Reformation of American Medical Boards**" ("**RAMBO**"). This case is one of The Kaul Cases, a series of legal interventions that officially commenced on February 22, 2016, but in actuality commenced on February 2, 1999 in the UK. These cases are of immense public interest, as their public prosecution will, through legal dissection, lay bare the pathological anatomy of the cancer of corruption that has America/Americans in its lethal grip. This exposition is the prelude to its surgical excision and chemical castration. The Kaul Cases are being watched by over two million (2,000,000) global citizens, the majority being lawyers, physicians, politicians, business executives and journalists. Thus far, they have witnessed political/judicial corruption more commonly observed in dictatorships, like China and Russia, but Kaul respectfully asserts that the spirit of America has not been extinguished by these malevolent forces. The intersection of The Kaul Cases, the COVID-19 pandemic and the so called "**Opiate Epidemic**", two of the most devastating plagues in the history of modern America, represents a confluence of events at a specific point in time, the outcome of which has the potential to change the world, for the better. The Defendants have attempted to suppress the truth, as the truth will decimate their economic standing, reputations and cause them to become incarcerated. In fighting for their lives, they continue to sacrifice the lives of the American people. The tragedy they now face is of their own making, and it is with their maker that they should make their peace, as the remainder of their lives will be subsumed by the penalties of their sins. Kaul has dismantled all of the Defendants' purported defenses and the legal theories on which these flawed defenses were submitted. Thus, the Defendants are now absolutely and totally defenseless. Kaul's claims are evidentially substantiated, and motions for summary judgment will be submitted shortly after January 26, 2021. On this date, the Defendants, much to their horror, will be forced to disclose their evidence to Kaul, the Court and most importantly, the public, whom Defendants NJBME/PMB/FSMB profess to want to "**protect**". The truth is the greatest protector.

K11-1 is a case about the truth of the Defendants' massive criminal schemes, many of which have been conducted while 'flying the flag' of the state. This case will expose the tyranny that is hidden from the public by the fragile film of civility covering the cesspool of corruption that is the State of New Jersey. Defendant State of NJ is not a place in which individuals and or corporations should invest.

## **Parties**

### **Plaintiff:**

Richard Arjun Kaul, MD - 440c Somerset Drive, Pearl River NY 10965  
862 881 9703 - drrichardkaul@gmail.com

### **Defendants:**

1. Federation of State Medical Boards - 400 Fuller Wiser Rd, Suite 300, Euless, TX 76039
2. Humuyan Choudry, MD - 400 Fuller Wiser Rd, Suite 300, Euless, TX 76039
3. Pennsylvania Medical Board - 124 Pine Street, Harrisburg, PA 17101
4. Mark Woodland, MD - 301 S 7th Avenue, Suite 245, West Reading, PA 19611
5. New Jersey Board of Medical Examiners - 140 E Front Street, Trenton, NJ 08608
6. Scott Metzger, MD - 160 Avenue at the Commons, Shrewsbury, NJ 07702
7. State of New Jersey - 25 Market Street, Trenton, NJ 08611
8. Steven Sweeney - 935 Kings Highway, Thorofare, NJ 08086
9. United States District Court for the District of New Jersey (Newark) - 50 Walnut Street, Newark, NJ 07102
10. Daniel Stolz, Esq - 110 Allen Road #304, Basking Ridge, NJ
11. Andrew Gregory Kaufman, MD - 16 Sierra Court, Hillsdale, NJ 07642
12. Doreen Annette Hafner, Esq - 49 Seminole Drive, Ringwood, NJ 07456
13. Ellen Wachs Kaufman - 16 Sierra Court, Hillsdale, NJ 07642
14. Robert Francis Heary, MD - 68 Blackburn Road, Summit, NJ 07901
15. Jay Howard Solomon, Esq - 25 Market Street, Trenton, NJ 08608
16. Cory Booker - 2 Riverside Drive, Camden NJ 08103
17. Charles Schumer - 322 Hart Senate Office Building, Washington, DC 20510
18. Allstate Insurance Company - Attention Thomas Wilson, 2775 Sanders Road, Northbrook, Illinois, 60062
19. Richard Crist - 2400 W Chew Street, Allentown, PA 18104
20. Geico Insurance Company - 5260 Western Avenue, Chevy Chase, MD 20815
21. John Robertelli, Esq - 25 Main Street, Court Plaza North, Hackensack, NJ 07601
22. General Medical Council of the UK - 350 Euston Rd, London NW1 3JN, UK
23. University of Pittsburgh - 4200 Fifth Avenue, Pittsburgh, PA 15260

## **Statement of Fact**

### **The Evidence:**

The conclusive evidence and undisputed facts in support of the K11-1 claims is contained within the court dockets of The Kaul Cases and within submissions filed in the District of Columbia (October 1, 2019 to December 10, 2020) that were diverted from the docket. The majority of this evidence will be submitted on January 24, 2021 with the First Amended Complaint. However, submitted with this complaint are thirty-three (33) pieces of evidence that prove directly/indirectly various elements of the Defendants' crimes. Kaul respectfully requests this Court note that in addition to the Defendants being utterly defenseless, they are also utterly panicked. This is evidenced by the desperation betrayed by their clinging to a few words of the fraudulent opinion of Defendant Solomon (December 13, 2013)(**Exhibit 26**), in the drowning hope that it will distract the court's mind from their unbridled felonious conduct. The DC court/Defendants included in their final opinion (K5) verbiage from a submission made by Defendant California Medical Board (**Exhibit 19**) that contained the opinion of Defendant Solomon, which the evidence of Defendant NJ proves is a massive fraud (**Exhibit 7**). The Defendants, despite having been provided multiple opportunities, have failed to rebut/contest/refute/address this evidence, which is their evidence, the evidence they used to illegally revoke Kaul's license (March 24, 2014). The Defendants are defenseless and will have no defense to Kaul's to be filed motions for summary judgment. It is noteworthy that the DC court, despite finding that the motion of Defendant California Medical Board was moot (**Exhibit 19**), permitted this false legal instrument to remain on the docket, for the purpose of prejudicing the mind of the DC Appeals Court. Regardless, the evidence is:

1. June 26, 2012: Letter from Kaul patient to Defendant NJBME - Kaul competency in minimally invasive spine surgery.
2. February 22, 2016: K1-D.E. 1 - Kaul education/training/qualifications in minimally invasive spine surgery.
3. February 22, 2016: K1-D.E. 1 - Kaul possession of NJ license to practice medicine and surgery.
4. February 22, 2016: K1-D.E. 1 - Defendant GMC violation in 2002 of the European Data Protection Act/HIPAA.
5. June 8, 2016: K1-D.E. 57-1 - Kaul superior competency in minimally invasive spine surgery.
6. April 19, 2017: K1-D.E. 179 - Kaul competency in minimally invasive spine surgery.

7. August 10, 2017: K1-D.E. 204-9 - Kaul competency in minimally invasive spine surgery.
8. August 21, 2017: K1-D.E. 205-1 - Defendants commission of crimes.
9. January 17, 2018: K1-D.E. 225 - Defendants commission of crimes.
10. February 5, 2018: K10-D.E. 226 - Defendants commission of crimes.
11. September 27, 2018: K2-D.E. 53 - Defendants commission of crimes.
12. February 8, 2019: K1-Filed but Defendant DNJ failed to publish to docket - Defendants commission of crimes.
13. February 11, 2019: K1-D.E. 299-12 - Defendants commission of crimes.
14. July 23, 2019: K2-D.E. 80-1 - Defendants commission of crimes.
15. July 31, 2019: K1-D.E. 387 - Defendants commission of crimes.
16. August 19, 2019: K1-D.E. 393 - Defendants commission of crimes.
17. August 19, 2019: K1-D.E. 393 - Defendants commission of crimes.
18. October 1, 2019: K5-D.E. 1 - Defendants commission of crimes.
19. February 5, 2020: K5-D.E. 69-4 - Defendants commission of crimes (By submitting a knowingly false legal instrument, that of the December 13, 2013 opinion of Defendant Solomon, the Defendants committed a Fraud on the Court.). The evidence of 'The Solomon Critique' (Exhibit 9-K1-D.E. 225) + 'The Solomon Critique 2' (Exhibit 12-K1-D.E. 299-18).
20. July 17, 2020: K1-D.E. 434-13 - Defendants commission of crimes.
21. September 22, 2020: K5-D.E. 148 - Defendants commission of crimes.
22. November 17, 2020-K1-D.E. 450 - Defendants commission of crimes.
23. November 17, 2020-K1-D.E. 450 - Defendants commission of crimes.
24. November 17, 2020-K1-D.E. 450 - Defendants commission of crimes.
25. November 17, 2020-K1-D.E. 450 - Defendants commission of crimes.
26. December 1, 2020-K5-D.E. 150 - Defendants commission of crimes (By submitting a knowingly false legal instrument, that of the December 13, 2013 opinion of Defendant Solomon, the Defendants committed a Fraud on the Court.). The evidence of 'The Solomon Critique' (Exhibit 9-K1-D.E. 225) + 'The Solomon Critique 2' (Exhibit 12-K1-D.E. 299-18).
27. December 2, 2020-K11-1 - Defendants commission of crimes.
28. December 11, 2020-K1-D.E. 452 - Defendants commission of crimes.
29. December 14, 2020-The Kaul Cases - Defendants commission of crimes.
30. December 16, 2020-K5-D.E. 155 - Evidence of truthfulness of Kaul's claims.
31. December 19, 2020-K5-Filed but Defendants blocked publication to docket - Defendants commission of crimes.
32. December 29, 2020-K5-D.E. 176 - Defendants commission of crimes.
33. December 30, 2020-K5-Filed but not published to docket - Defendants commission of crimes.

## **Legal Claims**

### **RICO 1**

#### **Racketeering charge against Defendants FSMB/PMB/NJBME**

In a period from September 2017 to the present Defendant FSMB did knowingly, willfully and in the knowledge of illegality, did conspire with Defendant PMB to obstruct Kaul's application for medical licensure in the State of Pennsylvania.

Defendants FSMB/Choudry was motivated by money and an unwritten policy of protecting its member state and Defendant NJBME from Kaul's prosecution of the claims asserted in The Kaul Cases.

Defendant FSMB is cognizant of the fact that a successful prosecution by Kaul would expose evidence of their commission of the crimes, and would subject them and their members to criminal prosecution.

Defendant FSMB is cognizant of the fact that Kaul, in the possession of a Pennsylvania license, would generate money for an increasingly aggressive prosecution of The Kaul Cases.

Defendant FSMB is cognizant of the fact that Kaul's prosecution would force its member and Defendant NJBME to disclose highly incriminating evidence of Defendants FSMB/NJBME corruption of state/federal politicians/judges.

Defendant FSMB is cognizant of the fact that Kaul's prosecution would force its member and Defendant NJBME to disclose highly incriminating evidence of their involvement in decades long schemes of bribery perpetrated by Defendants Allstate and Geico, and other for profit healthcare corporations, such as Purdue and the American Hospital Association.

In the relevant period Defendant FSMB conspired with Defendants PMB/NJBME and others to obstruct Kaul's application for licensure in the State of Pennsylvania, by using the US mail and wires on multiple occasions to perpetrate and further a knowingly illegal scheme in violation of RICO.

The conspiracy was conducted from and perpetrated through Defendant FSMB's headquarters in Texas.

On December 16, 2020 the US Senate issued a report that assigns responsibility for the so called **“opiate epidemic”** to Defendant FSMB. Defendant FSMB accepted bribes from for-profit healthcare corporations, as part of a quid pro quo scheme to further the economic agenda of the corporations through the exploitation of the American system of physician regulation. This illegal scheme caused the deaths of millions of innocent Americans. Defendants FSMB/Choudry continue to participate in a multitude of illegal profiteering schemes at the expense of the lives of the American people and medical profession.

### **RICO 2**

#### **Racketeering charge against Defendants NJ/NJBME/Booker/Sweeney**

In a period commencing in approximately 2008, Defendant State of New Jersey, under the control of the then governor and K2/K5 Defendant Christopher J. Christie began conspiring with Defendants Kaufman, Heary, Sweeney, Allstate, Crist and Robertelli to have Kaul's license revoked, destroy his economic standing/professional reputation and attempt to cause him to be jailed, deported and or die (hereinafter “destroy Kaul”).

One purpose of the conspiracy was to eliminate the economic threat that Kaul's increasingly successful minimally invasive spine surgery practice presented to their economic agendas.

Another purpose of the conspiracy was to manufacture an excuse to illegally eradicate a debt of \$45 million owed principally by Defendants Allstate/Geico to Kaul's corporations for clinical services he had rendered to their injured patients.

Defendants Allstate/Geico/Kaufman/Heary engaged in multiple acts of bribery and public corruption in which they funnelled bribes to Defendants Christie/Sweeney/NJBME/Solomon as part of a series of quid pro schemes, purposed to attempt to destroy Kaul.

Defendants Allstate/Geico/Kaufman/Heary knew that their schemes of public/judicial corruption constituted criminal violations of RICO.

Defendants Allstate/Geico/Kaufman/Heary trafficked the bribes through an elaborate network of lawyers, law firms and so called public relation companies, for the purpose of concocting a cover for the commission of their crimes. A percentage of the bribes were deposited into off-shore banks/trusts and Defendants Christie/Sweeney/NJBME paid no taxes on these monies.

In a period from 2017 to the present, Defendants Heary/Kaufman/Allstate/Geico bribed Defendants Booker/Schumer as a part of a series of quid pro quo schemes purposed to obstruct Kaul's prosecution of The Kaul Cases.

The bribes were funneled through law firms/public relation firms/off-shore trusts and bank accounts in an attempt to conceal the Defendants crimes from the scrutiny of the public and shareholders in Defendants Allstate/Geico.

Defendant Sweeney, in addition to having bribes trafficked using the aforementioned methods, did receive bribes under cover of so called 'political campaign donations'. The Defendant bribers (Allstate/Geico/Kaufman/Heary) and the Defendants bribed (Sweeney/Booker/NJBME) willfully and knowingly committed violations of criminal RICO, all purposed to attempt to destroy Kaul.

Defendants Sweeney/Booker/Christie converted Defendant NJ into a racketeering enterprise, through which they willfully committed/aided and abetted the predicate acts of mail fraud, wire fraud, subornation of perjury, bribery and obstruction of justice.

### **RICO 3**

#### **Racketeering charge against Defendants Hafner/Kaufman/Heary/Przybylski/NJBME/Solomon**

In a period commencing in 2006, Defendants Kaufman/Heary commenced conspiring with Defendants Hafner/Przybylski/NJBME to attempt to destroy Kaul. The conspiracy was perpetrated using the US mail and wires.

The Defendants scheme and "**pattern of racketeering**" is evidenced in the thousands of emails and texts that were exchanged between them and hundreds of Third Party Witnesses (physicians/lawyers/hospital executives/insurance executives) within the United States. The Defendants converted Defendant NJ and its agencies into racketeering enterprises.

Defendant Hafner's role in the criminal enterprise consisted of encouraging Kaul's patients to commit perjury during the hearing (April 9 to June 28, 2013) in the NJ Office of Administrative Law, an illegally conducted proceeding that was adjudicated by Defendant Solomon.

In a period commencing in approximately 2013 and concluding in late 2014 Defendant Solomon received bribes from Defendants Allstate/Geico, as part of a quid pro quo scheme, in which Defendants Allstate/Geico committed judicial corruption to have

Defendant Solomon enter an order to revoke Kaul's NJ license. The purpose of the scheme was to attempt to destroy Kaul.

Defendant Hafner willfully and knowingly converted the NJ OAL into a racketeering enterprise by accepting bribes from Defendants Allstate/Geico in return for conspiring with Defendants Solomon/Kaufman/Przybylski/NJBME to have multiple NJ physicians (Kenneth Rieger/Arash Emami/Albert Steinberger/George Naseef) commit perjury in the NJ OAL hearing.

#### **RICO 4**

#### **Racketeering charges against Defendants Allstate/Geico/Stolz/Robertelli**

Contained within the thousands of email/text exchanges between Defendants Allstate/Geico/Stolz/Robertelli (2012 to present) is evidence of their corruption/bribing of judges within Defendant DNJ. These schemes of judicial corruption have been in existence since at least 2000 and involve, amongst other things, the funnelling of bribes to district court judges by paying monies disguised as 'legal fees' to law firms from which district judges/family members to the third-degree are financial beneficiaries.

Through these massive schemes of judicial corruption Defendants Allstate/Geico and other for-profit healthcare corporations (Defendant Hackensack University Medical Center/Atlantic Health System/University Hospital-Rutgers) have perverted the course of justice in New Jersey. The opinions/orders of these corrupted cases have been incorporated into cases across the United States, thus Defendant DNJ has committed an unprecedented 'Fraud on the Court' and violated the right of every American court to do justice. Every case since 2000 that has involved Defendants Allstate/Geico in Defendant DNJ must be independently examined for judicial corruption, in order to remedy injuries to the victims and in the interests of American justice.

In a period from July 21, 2014 to late 2019, Defendant Stolz was counsel to the trustee of a bankruptcy proceeding in the United States Bankruptcy Court for the District of New Jersey, a related element of which appeared in late 2018 in Defendant DNJ.

In a period from approximately 2013 to late 2019, Defendants Allstate/Geico bribed Defendant Stolz to not have collected the \$45 million owed principally by Defendants Allstate/Geico to Kaul's corporations.

Defendants Allstate/Geico/NJ in the commission of the crimes against Kaul did cause the unlawful deaths of two elderly ethnic minority physicians that worked with and for



Kaul. Dr. Rodolpho Narag died in 2016 on January 11, 2016 and Dr. Dong Kwak died in late 2017. Kaul promised his colleagues' families that he would "**not rest**" till those responsible had been incarcerated and or suffered the same fate.

In a period from approximately 2013 to late 2019 Defendants Allstate/Geico/Stolz/Robertelli in conspiracy and collusion with bankruptcy judge, John Sherwood, converted the court into a racketeering enterprise, through the commission of the predicate acts of mail fraud, wire fraud and bribery.

The Defendants used the cover of a bankruptcy proceeding in an effort to conceal their crimes from public and prosecutorial scrutiny, in the knowledge that exposure would result in their incarceration, revocation of law licenses and decimation of Defendants Allstate/Geico share value on the NYSE.

In February 2020, the Defendants conspired with Sherwood to have him enter a knowingly illegal order purposed to attempt to restrain Kaul's prosecution of the crimes of Defendant Stolz.

#### **RICO 5**

#### **Racketeering charges against Defendants PMB/NJBME/Metzger/Woodland/Hafner**

On May 28, 2020 the State of Pennsylvania granted Kaul's application for medical licensure.

In a period from late 2017 to the present Defendants PMB/NJBME/Metzger/Woodland/Hafner have conspired to obstruct the issuance of a licensing number, in order to prevent Kaul from commencing clinical practice.

Defendants NJBME/Hafner/Metzger are motivated to engage in obstruction of justice in an increasingly futile attempt to 'cover-up' their commission of the crimes.

Defendant PMB is an active member of the "**one unit**" (FSMB/SMB), from which it and its other members receive bribes from multiple for-profit corporations including Defendants Allstate/Geico and others such as the American Hospital Association. All of these corporations were economically threatened when in February 2005 Kaul proved that lumbar spinal fusions could be safely/effectively performed on an outpatient basis. Kaul's procedure revolutionized spine surgery, and this procedure has now become the global standard of care.

Defendants PMB/Woodland recognize that they would be effectively eliminated from the “one unit” and deprived of the economic benefit of bribes from for-profit corporations if they deviated from Defendant FSMB’s illegal scheme of racketeering and monopolization of the business of so called physician regulation.

Defendants NJBME/Metzger/Hafner did conspire to obstruct Kaul’s application in 2018 for reinstatement of his illegally revoked NJ license (March 24, 2014). The motivation for the obstruction was part of a rapidly failing effort to ‘cover-up’ the commission of their crimes.

Defendants PMB/NJBME/Metzger/Woodland/Hafner did, in a period from late 2017 to the present, collude and conspire with Defendants FSMB/Allstate/Geico to obstruct justice by: (i) illegally denying Kaul’s application for reinstatement of his NJ license (ii) knowingly and willfully failing to follow the law and an order of the State of Pennsylvania and issue Kaul a Pennsylvania license number.

#### **RICO 6**

#### **Racketeering charges against Defendants Crist/Sweeney/Booker/Schumer**

In a period from 2012 to the present Defendants Crist/Sweeney/Booker/Schumer converted the NJ OAL and Defendants NJBME/DNJ into racketeering enterprises through the commission of the crimes and a “pattern of racketeering”. The motivation for the crimes was money and a quest for political power. Defendants Sweeney/Booker/Schumer required vast sums of cash to fund their political campaigns to hold onto the reigns of political power, in order to embezzle as many millions of dollars before leaving public office.

Defendant Crist in collusion and conspiracy with Defendants Sweeney/Booker/Schumer engaged in schemes of bribery/public corruption purposed to obstruct Kaul’s prosecution of The Kaul Cases in Defendant DNJ, through the perpetration of corruption of federal judges in Defendant DNJ. The motivation for the obstruction was an attempt to both ‘cover-up’ their crimes (2006 to the present) and to prevent Kaul from obtaining email/text/written/oral evidence of their commission of the crimes and evidence implicating hundreds of Third Party Witnesses (physicians/lawyers/state judges/federal judges/state politicians/federal politicians).

Defendant Crist, now the Chairman at Muhlenberg College in Pennsylvania, recognizes the immense liability his crimes have, through the doctrine of vicarious liability, conferred on the college.

Defendant Crist was motivated to commit the crimes because he holds substantial shares in Defendants Allstate/Geico and recognized that by corrupting Defendants Schumer/Sweeney/Booker, he controlled state/federal legislatures. With this power Defendant Crist had enacted unconstitutional/illegal laws (IFPA) that improperly advanced the economic agenda of Defendants Allstate/Geico at the expense of the liberty/life/property of the American public and medical profession.

Defendants Crist/Schumer/Booker/Sweeney in collusion and conspiracy with Defendants Allstate/Geico corrupted Defendants FSMB/NJBME/PMB to eliminate (license revocation/incarceration/suicide) physicians to whom they owed monies for the provision of clinical services.

The scheme perpetrated by Defendants Crist/Schumer/Booker/Sweeney did corrupt Defendant DNJ and other NJ state courts. The purpose of this corruption was to ensure that these courts/judges perverted the course of justice by tampering with evidence/witnesses and causing a subornation of perjury in order to have prevail every case filed by Defendants Allstate/Geico against physicians to whom these Defendants owed monies.

The scheme against certain members of the medical profession involved corrupt physicians/ politicians/lawyers/judges, all of whom were motivated to knowingly commit these crimes in the pursuit of power and money.

### **RICO 7**

#### **Racketeering charges against Defendants GMC/PMB/NJBME/Hafner/NJ**

In 2002 Defendant GMC with knowledge and malice violated Kaul's legal rights pursuant to the European Data Protection Act and HIPAA in illegally providing Kaul's highly confidential health information to Defendant NJBME. This criminal breach caused immense and ongoing damage to Kaul's professional reputation and career.

From 2002 to the present Defendants NJBME/Hafner have with malice and a willful violation of the law disseminated this information to hundreds of individuals using the US mail and wires. The purpose of these criminal acts was an attempt to destroy Kaul.

From 2017 to the present Defendant PMB conspired with Defendant GMC to willfully, knowingly and with malice violate the law and Kaul's legal rights by using the US mail and wires to illegally transmit Kaul's highly confidential health information. The purpose of these criminal acts was an attempt to destroy Kaul.

In a period from 2017 to the present Defendant PMB in collusion and conspiracy with Defendants FSMB/NJBME/Allstate/Geico did willfully and knowingly convert the State of Pennsylvania into a racketeering enterprise by aiding/abetting the perpetuation/furtherance of the crimes committed against Kaul by Defendants NJBME/Hafner/Solomon/Kaufman/Przybylski (April 9 to June 28, 2013) in the NJ OAL. These crimes caused the illegal revocation of Kaul's NJ license (March 24, 2014).

In a period from 2017 to the present Defendants PMB/Woodland have abused the power of the State of Pennsylvania with the tacit consent of Governor Thomas Wolf/AG Joshua Shapiro. Third-Party Witnesses Wolf/Shapiro are motivated to perpetuate the crimes as they have received bribes and other favors of a tangible/intangible nature from Defendants Allstate/Geico and the American Hospital Association.

*(These corporations have bribed Defendant Schumer. On November 15, 2020 President Trump issued an executive order that forces hospitals/insurers to disclose their private price deals, an order that provides the public with knowledge about the cost of healthcare. The order to reduce price-gouging was opposed by the insurance/hospital-industrial complex. The certification by Governor Wolf of the Pennsylvania 2020 vote was perverted by these for-profit healthcare corporations, of which Defendant University of Pittsburgh is a member. Governor Wolf spoke with Defendant Schumer just prior to certifying the vote. Prior to November 3, 2020, President Trump had refused to advance policies of these corporations that exploited the American public, so they resorted to manipulation/interpretation of the electoral machinery by politicians on their payroll.)*

Text and email/metadata evidence is contained within the servers of the ISP of hundreds of Third-Party Witnesses.

Commencing on February 22, 2016, many Defendants in The Kaul Cases have willfully and in knowledge of its illegality, tampered with evidence, by deleting emails and destroying computers/servers which they used to facilitate commission of the crimes. However, multiple Third-Party Witnesses within the United States and United Kingdom have copies of these emails in their possession.

The Defendants were instructed by their lawyers and members of the Office of the New Jersey Attorney General to destroy evidence of their crimes.

In a period from 2002 to the present Defendant NJ has aided and abetted the Defendants' violations of RICO and deprived Kaul of his constitutionally protected right to due process under the color of state, pursuant to section 1983 of the 1964 Civil

Rights Act. The motivation of this nineteen (19) year-long state-orchestrated criminal scheme was an attempt to destroy Kaul.

Defendant NJ in collusion and conspiracy with Defendants DNJ/Allstate/Geico did perpetrate and continue to perpetrate an illegal scheme to obstruct Kaul's prosecution of The Kaul Cases, in an attempt to 'cover-up' their decades-long commission of the crimes.

Defendant Hafner, principally for reasons of professional advancement and serious character flaws, has aided/abetted the Defendants crimes by abusing the power of public office to file knowingly false claims against physicians owed monies by Defendants Allstate/Geico, many of whom are of Indian or Middle-Eastern origin. Defendant Hafner has prosecuted these claims in furtherance of Defendant NJ/Allstate/Geico's policy of racially profiling physicians belonging to ethnic minorities.

The Defendants corruption of Defendants NJBME/PMB/FSMB is responsible for the highest per capita COVID-19 mortality/morbidity rate amongst westernized democracies. Corrupt state medical boards violated state medical practices acts and were derelict in their statutory duty to **"protect the public"** by willfully failing to detect the threat of COVID-19 and forewarn the public. The immense civil disorder/disturbance and societal fracture is directly related to the Defendants crimes.

### **RICO 8**

#### **Racketeering charges against Defendants Kaufman/E-Kaufman/NJ**

In a period from 2010 to the present Defendant Ellen Wachs Kaufman has aided and continues to aid and abet the Defendants crimes.

Defendant E-Kaufman is in possession of knowledge and evidence (emails/texts) of the Defendants crimes, but has violated the law in not reporting these crimes to the FBI.

Defendant E-Kaufman continues to engage in a **"pattern of racketeering"** with Defendants Kaufman/NJ as part of a knowingly unlawful scheme to conceal the crimes of her husband and the other Defendants.

Defendant E-Kaufman is motivated to participate and perpetuate the Defendants crimes as she is economically intertwined with Defendant Kaufman and continues to benefit from the profits of his crimes.

Defendant's E-Kaufman recognizes that the crimes of her husband, Defendant Kaufman, will cause him to be incarcerated and might expose her to criminal prosecution pursuant to the doctrine of vicarious liability as set forth in RICO.

Defendant E-Kaufman recognizes that pursuant to the doctrine of vicarious liability as set forth in RICO, that her adult children remain the beneficiaries of Defendant Kaufman's criminal profits, are Third-Party Witnesses and are liable to prosecution. The same point holds true for Cynthia Crist, the wife of Defendant Crist.

Defendant E-Kaufman, in providing material support to Defendant Kaufman, in the commission of the crimes, is liable for his crimes, pursuant to RICO.

### **Relief**

Plaintiff Kaul continues to seek the relief sought on February 22, 2016 (K1-D.E. 1 Page ID 200) (enclosed in **Exhibit 33**.)

I, Richard Arjun Kaul, MD, do hereby certify and swear under penalty of perjury that the above evidence/facts/statements/claims are true and accurate to the best of my knowledge, and that if it is proved I knowingly and willfully misrepresented the facts, then I will be subject to punishment.

Dated: January 3, 2021



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Richard Arjun Kaul, MD

**RECEIVED**

2/5/2021 DB

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

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

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RICHARD ARJUN KAUL, MD

Plaintiff

v.

ALLSTATE INSURANCE COMPANY, ET AL

Defendants

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Civil Case:

21cv736

Judge Sara L. Ellis

Magistrate Judge Jeffrey T. Gilbert

Complaint

I, the Propria Persona Plaintiff, Richard Arjun Kaul, of full age do hereby submit this Complaint on January 27, 2021 seeking the within referenced relief

Dated: January 27, 2021



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Richard Arjun Kaul, MD

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

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RICHARD ARJUN KAUL, MD

Civil Case:

Plaintiff

v.

CERTIFICATE OF SERVICE  
ON ALL DEFENDANTS

ALLSTATE INSURANCE COMPANY, ET AL

Defendants

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I, Richard Arjun Kaul, MD, do hereby certify the following:

1. I have submitted an application for IFP status, and respectfully request that the U.S.M.S. do serve the Summons/Complaint on the Defendants.
2. In order to preserve the Court's resources, I did, on January 27, 2021 request that by February 2, 2021, the Defendants sign Form AO 399 9(WAIVER OF THE SERVICE OF SUMMONS).
3. A copy of this Complaint will be forwarded to American/British state/federal investigative/prosecutorial authorities, due to the criminal nature of the charges.
4. A copy of this Complaint will be submitted to the European Court of Human Rights, due to the Defendants violations of international human rights.

I do certify that on February 3, 2021, I will submit to the Court a list of those Defendants who have refused to waive service, and respectfully repeat my request that service be effectuated by the U.S.M.S. and the Defendants be penalized with the associated costs/sanctions.



Handwritten signature of Richard Arjun Kaul, consisting of stylized initials 'R' and 'K' followed by a small '1'.

Dated: January 27, 2021

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Richard Arjun Kaul, MD

cc: All Defendants

## **Jurisdiction + Venue**

U.S.C. section 1331 because Plaintiff's claims arise under federal law, and under 18 U.S.C. section 1964(c) because this action alleges violations of RICO, 18, U.S.C. section 1962., This Court has subject matter jurisdiction pursuant to 28 U.S.C. sections 1343(3) and 1331 because this action alleges violations of section 1983. This Court also has subject matter jurisdiction over this action pursuant to 28 U.S.C. section 1332(d)(2)(A)(4) because Plaintiff is a citizen of a different state to the Defendants and the aggregate amount in controversy exceeds seventy-five thousand (\$75,000) dollars. This Court also has jurisdiction because the District of New Jersey is both a defendant, and an adversary in the United States of District Court for the Northern District of Texas, and because the Defendants include all district/magistrate judges in Defendant District of New Jersey-Newark.

Personal Jurisdiction: This Court has personal jurisdiction over each Defendant. Each Defendant has transacted business, maintained substantial contacts and or committed overt acts using the US mail/wires in furtherance of the illegal scheme and conspiracy throughout the United States, including this district. This Court also has personal jurisdiction over all Defendants pursuant to Fed. R. Civ. P. 4(k)(1)(A) because they would be subject to the jurisdiction of a court of general jurisdiction in the Northern District of Illinois (720 ILCS 5/Art. 33 - ARTICLE 33. OFFICIAL MISCONDUCT).

Venue: Venue is appropriate in this District for the Plaintiff's claims pursuant to 28 U.S.C. section 1391(b)(1)(2) and 18 U.S.C. section 1965(a).

The law prohibits the United States District Court for the District of New Jersey and any non-defendant judge in that district from performing any administrative/ministerial/adjudicative function in regards to any aspect of K11-3 or indeed any of **The Kaul Cases**.

## **Parties**

### **Plaintiff:**

Richard Arjun Kaul, MD:  
440c Somerset Drive, Pearl River NY 10965  
862 881 9703  
[drrichardkaul@gmail.com](mailto:drrichardkaul@gmail.com)

### **Defendants:**

1. Allstate Insurance Company - Attention Thomas Wilson, 2775 Sanders Road, Northbrook, Illinois 60062
2. Geico Insurance Company - 5260 Western Avenue, Chevy Chase, MD 20815
3. Northern Trust - Attention Michael O'Grady, President/CEO, 50 South La Salle Street, Chicago, IL 60603
4. Madeline Cox Arleo - Court Room MLK 4A, 50 Walnut Street, Newark, NJ 07102
5. Claire C. Cecchi - Courtroom MLK 5B, 50 Walnut Street, Newark, NJ 07102
6. Stanley R. Chester - Court Room PO No.2, 50 Walnut Street, Newark, NJ 07102
7. James B. Clark - Courtroom MLK 2A, 50 Walnut Street, Newark, NJ 07102
8. Joseph A. Dickson - Court Room MLK 2D
9. Mark Falk - Courtroom PO 09, 50 Walnut Street, Newark, NJ 07102
10. Michael A. Hammer - Courtroom MLK 2C, 50 Walnut Street, Newark, NJ 07102
11. Brian Martinotti - Courtroom MLK 2C, 50 Walnut Street, Newark, NJ 07102
12. Edward S. Kiel - Court PO 08, 50 Walnut Street, Newark, NJ 07102
13. Steven C. Mannion - Courtroom MLK 2B, 50 Walnut Street, Newark, NJ 07102
14. John Sherwood - Courtroom 3D, 50 Walnut Street, Newark, NJ 07102
15. Kevin McNulty - Court PO 04, 50 Walnut Street, Newark, NJ 07102
16. Esther Salas - Courtroom MLK 5A, 50 Walnut Street, Newark, NJ 07102
17. John Michael Vazquez - Courtroom PO 03, 50 Walnut Street, Newark, NJ 07102
18. Cathy L. Waldor - Courtroom MLK 4D, 50 Walnut Street, Newark, NJ 07102
19. Leda Dunn Wettre - Courtroom MLK 3C, 50 Walnut Street, Newark, NJ 07102
20. Susan D. Wigenton - Courtroom MLK 5C, 50 Walnut Street, Newark, NJ 07102
21. Freda Wolfson - Courtroom 5E, 50 Walnut Street, Newark, NJ 07102
22. Stewart Leviss - Law Firm of Berkowitz/Lichstein/Kuritsky/Giasullo - 75 Livingston Avenue, Roseland, NJ 07068
23. Jose Linares - Law Firm of English/McCarter - Four Gateway Center, 100 Mulberry Street, Newark, NJ 07102 - [jlinares@mccarter.com](mailto:jlinares@mccarter.com)

In COUNT FOUR-DEPRIVATION OF RIGHT UNDER COLOR OF LAW, the following Defendants 4/5/6/7/9/10/12/14/16/18/19/20/ are collectively referred to as “**AA**”, the Aiders/Abettors.

## **Preliminary Statement**

This case is about the most pernicious variant of corruption, that of judicial corruption, a crime that corrodes the fabric of democratic society, and threatens the good order of civilization and society (**Exhibit 1**). Judicial corruption is a crime the Defendants have been committing since at least 1999. At the core of this case is a coterie of white collar crooks who continue to launder the proceeds of their crimes through the legal/judicial machinery of the United States District Court for the District of New Jersey (“**DNJ-N**”). The Defendants have conspired and continue to conspire to both launder these proceeds and provide ostensibly legitimate ‘legal cover’ for a series of massive crimes they have committed through administrative/medical board/state/bankruptcy/federal/appellate courts within the physical and legal boundaries of New Jersey. These crimes, ones committed under color of law and perpetrated with/through the politico-legal machinations of state commenced in 2006 and are ongoing and include:

### **The Crimes:**

(1) Racketeering; (2) Perjury; (3) Fraud; (4) Evidence/Witness Tampering; (5) Obstruction of Justice; (6) Public Corruption; (7) Judicial Corruption; (8) Bribery; (9) Kickbacks; (10) Manslaughter; (11) Conspiracy.

### **The Main Crime Scene:**

The United States District Court for the District of New Jersey-Newark (“**DNJ-N**”).

The originating motivation for the crimes (2006 to 2021) was professional jealousy/political corruption/fraud/greed, amongst the Defendants identified in **The Kaul Cases**. In 2021, these crimes, as Kaul has previously described, commenced as would an illegal camp-fire in a northern California forest, but one that the winds of truth have converted into a raging inferno that now covers several states.

**The Kaul Cases** expose how corruption of the judicial/legislative/political veins of American society by ruthless for-profit corporations is responsible for the so called “**opiate epidemic**”, the world’s highest COVID-19 related death rate, the world’s highest rate of human incarceration and now what is being referred to as the “**pain epidemic**”. The latter plague is a consequence of a set of guidelines negligently implemented by the CDC, under instruction from persons/corporations seeking to further their political/economic agendas. America incarcerates more physicians per capita than any other country in the world, and pulling the strings of this physician pogrom is the health insurance industry, of which Defendants Allstate/Geico are controlling members.

**The Kaul Cases** seek, amongst other things: (1) **“Reformation of American Medical Boards” (“RAMBO”)**; (2) The relief as set forth in K1 (D.E. 1 page 200) (**Exhibit 1**), which includes political campaign finance reform.

This case, K11-2, strikes at the heart of the cancer of corruption that has metastasized and taken control of the Defendant judges. The lives of many innocent Americans have been destroyed by these Defendants, criminals disguised as judges, who have abused their power, their discretion and sold their souls for money/professional favor/political advantage. Innocent humans have been trafficked into for-profit correctional facilities from which the insurance industry profits. Families destroyed. Children left destitute. Suicides and an unimaginable degree of psychological/emotional/physical carnage, perpetrated by the Defendants, individuals to whom the public looks for truth and justice, but individuals who have, because of their lethal greed, looked the other way, while effectively signing death warrants. Economic incarceration, social incarceration, psychological incarceration and physical incarceration. Corrupt judges in collusion and conspiracy with soulless for profit corporations/executives have made America a very sick place. The COVID-19 pandemic has exposed the massiveness of its sickness. Fewer people are emigrating to America. Fewer foreign corporations are investing in America. Its wealth divide is the highest in the western world, and there are many parts of America where poverty levels exceed those seen in many so called third world countries. The Defendants have contributed and continue to contribute to these national maladies and if not stopped, the inhumane suffering of America and Americans will continue.

The motivations/mechanisms/modes of judicial corruption are thoroughly described in a 2009 article in THE YALE LAW JOURNAL (**Exhibit 2**):

**“ ... judges who were exposed in an expansive investigation by the PIN (Public Integrity Section-US DOJ), dubbed “Operation Greylord,” into corruption within the Cook County Court of Chicago, Illinois ... cases of corruption involving multiple and prestigious judges, large stakes, and egregious corruption, since such cases’s scope and ramifications are more likely to grab the attention of the PIN and the major media.”**

The **“stakes”** for the Defendants in this case are **“large”**. Their crimes are **“egregious”**. However, the benefits to the American public of civil/criminal convictions are immense, both in terms of restoring confidence in the institutions that are the bedrock of American democracy, those of the political/legal bodies.

The information in this Complaint is organized in accordance with, and meets the pleading standards set forth in Rules 8/9 of the F.R.C.P. and those pursuant to Twombly/Iqbal. This initial Complaint, which will be amended as and when criminal investigations expose further wrongdoing, provides fair notice to this Court and the Defendants of the charges levied against them.

K11-3 can be summed up with the following statement:

**To increase corporate/executive profit and share price, corporations traded on the NYSE perpetrate massive schemes of bribery/public corruption/judicial corruption:**

- 1. Corruption of the Courts: The bribes are covertly funneled from the pockets of the corporations into the pockets of lawyers/law firms/political lobbyists/public relation firms, with whom corrupt judges/families are commercial beneficiaries. The quid pro quo is that judges enter judgments in favor of the corporations when they are the plaintiff, and enter judgments in favor of the corporations when they are defendants. Either way the American public loses.**
- 2. Corruption of Congress/State Legislatures: The corporations use the same avenues of bribery as for Corruption of the Courts. The quid pro quo is that all legislation favorable to corporate/executive/shareholder profits is enacted, while all legislation not favorable to these profits is not enacted. Either way the American public loses.**
- 3. Corruption of the Executive Branch of Federal/State Government: Bills favorable to corporate/executive/shareholder profits are signed by State Governors/President, while all bills not favorable are not signed. Either way the American public loses.**
- 4. Corruption of the media: The corporations hold substantial minority stakes in the majority of media outlets, including Google. News favorable to their commercial agendas is propagated, while news not favorable is suppressed. Either way the American public loses.**

The below paragraphs, although not technically an element of the Complaint's legal framework, frame the mechanism by which corruption in America is leading to its global demise as the world's super-power:

**Beginning in the 1970s for-profit corporations have made the United States of America the "United States of Corruption", in which the victims are the good people of this country, the common man. Part of the corporations' strategy has been to subdue the population with just enough**

**food/housing/clothing/mind-numbing media to subvert any thoughts of revolution.**

**By 2025, China will be the world's superpower. In China, corruption of judges/politicians/legislatures is punishable by death. However, corruption of foreign governments is encouraged, as the Chinese recognize that the cancer of corruption erodes national power. China has purchased/controls large swathes of the American political establishment. Military might is a diminishing mode of the procurement/propagation of power, replaced by so called "soft power", that which includes skills such as the writing of computer code. Over 75% of the world's programmers are Indians and Chinese. American corporations/government servers are hacked more frequently than those in China or India. The reason is that the code for the protective fire-walls is sold by corrupt American officials to foreigners. American Public Relation Companies, such as Mercury Public Relations ("MPR") have played defining roles in these schemes. MPR is mentioned on several occasions in the report from special counsel, Robert Mueller re: election interference in 2016.**



## **The Evidence + Statement of Fact**

The evidence that proves the elements of the claims is contained within the following exhibits, excerpts from which are included in this Complaint:

1. March 30, 2016 (K1-D.E. 14) (Exhibit 1): **“The federal court for this district has proven itself to be most sympathetic to the state government ... defamatory conduct is also alleged to have occurred, Washington, DC and Chicago are the location of defendants CNS [also Defendant Allstate] ... I firmly believe that if the court transfers the matter to the District of New Jersey I will be prejudiced.”**
2. June 27, 2016 (K1-D.E. 66) (Exhibit 2): **“The defendant has attempted to obstruct justice by violating her duty to avoid the unnecessary expenses of service ...”**
3. July 14, 2016 (K1-U.S.C.A. for the Second Circuit-D.E. 41) (Exhibit 3): **“The District of New Jersey will be strained to deliver impartial justice because of the politico-legal nexus between its judiciary and the defendant-appellees ... The defendant-appellee state committed fraud on the court when it used forged documents to procure judgment against the plaintiff-appellant...”**
4. August 22, 2016 (K1-D.E. 96) (Exhibit 4): **“I am not clear as to what motive Ms. Bellin would have in stating the obvious, other than to prematurely and improperly suggest a position she would wish the court to take.”**
5. August 22, 2016 (K1-D.E. 97) (Exhibit 5): **“The outcome of this case has enormous consequences for many parties ...”**
6. August 23, 2016 (K1-D.E. 101) (Exhibit 6): **“ ... I would ask that she now provide a complete list of all individuals who are “employees”, with a brief description of their connection to the “ matters” of the subpoena.”**
7. September 6, 2016 (K1-D.E. 107) (Exhibit 7): **“ ... I am of the opinion that the issue of venue, in this matter, is critical. I would, therefore, like to know when the next case management conference will occur, and when the motion to retransfer the matter to the S.D.,N.,Y. Will be considered.”** - The motion was ignored and never adjudicated.

8. October 7, 2016 (K1-D.E. 118) (Exhibit 8): **“I write this letter to bring the court’s attention a number of state-orchestrated acts that I believe have been instigated in retaliation for the above matter ... On September 21, 2016 at approximately 1:30 am eight armed police officers from the Somerset County Sheriff’s Office arrested me at my residence on a warrant for non-payment of child support ... It is significant that the complaint was only filed AFTER I had filed the federal complaint, and the assistant prosecutor has not returned my calls.”**
9. December 20, 2016 (K1-D.E. 139) (Exhibit 9): **“The new complaint will maintain the counts and allegations against the same defendants from the First Amended Complaint, but accounts for the significant and factual procedural developments that have occurred since the original complaint was filed ... state’s retaliatory actions ... state was complicit in violations of the European Data Protection Act and HIPAA, that caused harm to the plaintiff and approximately three thousand of his patients.”**
10. June 29, 2017 (K1-D.E. 198) (Exhibit 10): **“Opposition to Defendants’ application to stay Court’s Letter Order of Joint Discovery Plan ... Please accept this letter as my opposition to a letter, dated June 19, 2017, from Marc D. Haefner (ECH# 195), the advocate for defendant Hackensack University Medical Center, in which he seeks, on behalf of all defendants, a stay of the discovery order you entered on June 9, 2017 (ECF #190).”** - In K5, order D.E. 155 for a Joint Discovery Plan (conference scheduled January 26, 2021) was illegally stayed by Defendant Dickson.
11. June 29, 2017 (K1-D.E. 197) (Exhibit 11): **“ ... an order the Court entered on June 9, 2017 (ECF #190), that requires the parties to submit proposals for a Joint Discovery Plan.”** - Defendant Mannion illegally stayed the order and obstructed justice.
12. June 29, 2017 (K1-D.E. 198) (Exhibit 12): **“Because of the unique circumstances and facts surrounding this case, that involve a politician/lawyer defendant with connections to all parts of the New Jersey legal apparatus , it is not unreasonable to conclude that he will use his influence to pervert the course of justice.”**

This Complaint is supported by one hundred and eight (108) Exhibits of evidence in support of the claims against the Defendants. Within each exhibit exists evidence probative to claim proof. The Bates Number of each Exhibit is indicated on the

document entitled “**EXHIBITS BATES NUMBER**”, which also includes further excerpts from the highly incriminating corpus of evidence.

## **The Schemes + The Tactics**

The tactics used by the Defendants to Obstruct Justice and obstruct Kaul's prosecution of **The Kaul Cases** include, but are not limited to: (1) conspire with clerical court employees to divert/lose/not publish to the docket paper filings submitted by Kaul to the 'late-drop-box' and the office of the filing clerk; (2) conspire with clerical court employees to omit critical pages from published documents; (3) conspire to delay/ignore adjudication of motions filed by Kaul; (4) conspire to deny and deny all motions filed by Kaul for discovery; (5) conspire to deny and deny all motions filed by Kaul for Default Judgment; (6) conspire to deny and deny all motions filed by Kaul for Summary Judgment; (7) conspire to deny and deny all motions filed by Kaul for case management conferences; (8) conspire to grant and grant every motion filed by the **The Kaul Cases** Defendants to stay Kaul's prosecution of the cases; (9) conspire to grant and grant all motions filed by **The Kaul Cases** Defendants to dismiss Kaul's claims; (10) conspire to transfer and transfer all of **The Kaul Cases** to the Defendant DNJ-N; (11) conspire to transfer and transfer all cases to, amongst others, Defendants McNulty/Mannion/Vazquez/Dickson; (12) conspire to falsify and falsify legal opinions/orders by knowingly citing inapposite cases/omitting critical evidence; (13) conspire to and actually engage in massive ongoing schemes of ex parte communications with **The Kaul Cases** Defendants, in both digital/non-digital formats, including face-to-face meetings in court chambers/bar association meetings/legal conferences; (14) knowingly illegal use of the US mail and wires to perpetrate the overall scheme to obstruct the prosecution of **The Kaul Cases**; (15) aiding and abetting the Defendants crimes by failing to report the crimes to investigatory/prosecutorial state/federal authorities; (16) use of law firms in which the Defendant judges remain commercial beneficiaries to funnel bribes from **The Kaul Cases** Defendants as part of a series of quid pro quo schemes purposed to obstruct Kaul's prosecution of **The Kaul Cases** and provide 'cover' for their crimes (2006 to 2021); (17) use of public relation firms to funnel bribes from **The Kaul Cases** Defendants into off-shore banks/trusts purposed to attempt to avoid detection/evade paying taxes; (18) conspire with certain members of the U.S.C.A. for the Third Circuit to enter orders purposed to manipulate the procedural posture of K1 in order to intentionally deprive the appellate court of jurisdiction, have the case remanded to Defendant DNJ-N and then continue the tactics of obstructing Kaul's prosecution of **The Kaul Cases** i.e. creating a 'legal merry-go-round' or the legal equivalent of the precept of Jean-Paul Satre's "**No Exit**"; (19) Exerting influence on U.S.D.J. in other districts to transfer cases to the District of New Jersey; (20) conspiring with **The Kaul Cases** Defendants and state/federal politicians to have bribes funneled through law firms/public relation/political lobbying firms in or over which the politicians had or have a controlling interest or stake; (21) conspiring with **The Kaul Cases** Defendants to condition partial payment of the bribes

on particular legal milestones in the case e.g. denial of discovery; (22) conspiring with NJ state investigatory/prosecutorial authorities to have them ignore Kaul's requests for investigation of the Defendants crimes of judicial corruption; (23) conspiring with certain members of the Judicial Disciplinary Committee of the Third Circuit to quash and not have investigated Kau's complaints of the Defendants crimes; (24) conspiring with certain members of the NJ field office of the FBI to quash and not have investigated Kaul's complaints regarding the Defendants crimes; (25) conspiring with certain members of the NJ state government/office of the AG to obstruct Kaul's 2018 application for reinstatement of his illegally revoked NJ medical license.

## The Injuries

### Kaul:

Kaul's license was illegally suspended/revoked on April 2, 2012/March 24, 2014, a crime that continues to cause irreversible injury to his professional/personal life and economic standing/reputation, as well as ongoing injuries to his children. Some of the injuries, as of November 2018, are detailed in (Exhibit 25). From November 2018 to the present, Kaul has sustained further injuries as pled in K11-1 (Exhibit 107).

### Kaul's patients:

Subsequent to the widely publicized suspension/revocation, hundreds of Kaul's patients without health insurance became abandoned, as they were unable to find a physician to provide care. A number of these individuals committed suicide.

### Kaul's family:

Please see (Exhibit 108).

The Defendants in full knowledge of their crimes, the consequences of their crimes and the ongoing injuries to Kaul, his family and patients, continue their “**pattern of racketeering**” within the United States District Court. The Kaul Cases are being watched by a global audience of just over two million (2,000,000) individuals, consisting principally of business executives, physicians, lawyers, politicians/judges and journalists. K1 was filed on February 22, 2016 and was publicized, as have all The Kaul Cases. The majority of the Defendants know that Kaul has communicated his opinion (emails/briefs) that foreign companies should not invest in New Jersey, due to the endemic corruption. The majority of the Defendants are aware of the fact that Kaul's family were central to the building of modern-day India after independence in 1947, and that once Kaul has commenced winning The Kaul Cases, he will relocate to India and begin his campaign to become Prime Minister. On January 25, 2021, CNN published a story entitled: “**Foreign companies are giving up on the United States and betting big on China ... Foreign direct investment to India has similarly skyrocketed, from less than \$25 billion in 2014 -- before Prime Minister Narendra Modi took power -- to \$57 billion last year.**” The husband of Kaul's cousin sits on the Indian Supreme Court, a Court whose judges are aware of The Kaul Cases. Corruption is not good for the economic health of a country, but judicial corruption, particularly when publicized, can be lethal.

## **Legal Claims**

The Defendants' crimes, their aiding and abetting of the crimes and their failure to report the crimes to investigatory/prosecutorial authorities constitute violations of 18 U.S.C. § 201 - Bribery of public officials and witnesses. Kaul has brought to the attention of the FBI/State AG/US Senate/US Congress the Defendants crimes.

The legal claims are based on the above evidence.

### **COUNT ONE - RICO**

#### **As to Defendants Allstate/Geico/Northern Trust/McNulty/Mannion/Vazquez/Dickson/Linares/Wolfson**

Kaul incorporates the above evidence/facts into Count One (1).

In a period from April 19, 2016 to the present, the Defendants have engaged in massive schemes of bribery and judicial corruption in a series of quid pro quo schemes, that are ongoing and purposed to obstruct Kaul's prosecution of **The Kaul Cases**.

The Defendants, with knowledge of its illegality, have used the US mail and wires on hundreds, if not thousands, of occasions to perpetrate their illegal scheme, in which they knowingly converted the United States District Court for the District of New Jersey-Newark ("**DNJ-N**"), into a "**racketeering enterprise**", from which they procured illegal profits.

Defendant Northern Trust holds a large minority of shares in Defendant Allstate, a corporation traded on the NYSE.

Subsequent to the filing of K1, Defendants Allstate and Northern Trust have engaged in thousands of acts of mail and wire fraud, in furtherance of the scheme of judicial corruption of judges in DNJ-N.

Defendants Allstate/Northern Trust conspired to and did commit judicial corruption of judges in DNJ-N, in order to obstruct Kaul's prosecution of **The Kaul Cases**, in an attempt to conceal evidence of their decades long massive schemes of public corruption of state/federal politicians/judges.

Specifically, Defendants Allstate/Northern Trust recognize that **The Kaul Cases** have exposed and will continue to expose the specific detail of their decades-long schemes of bribery and public/judicial corruption.

Defendants Allstate/Northern Trust recognize the serious criminal consequences of their schemes of judicial corruption and their conversion of the American federal court system into a racketeering enterprise, from which they have illegally profited.

Defendants Allstate/Northern Trust have for at least the last two decades, laundered their illegal profits through the NYSE, thus converting it into a racketeering enterprise and depriving its market competitors and the public of their right to honest services.

Defendants Allstate/Northern Trust conspired with, amongst others, **The Kaul Cases** Defendants, Christie, Sweeney, Solomon and Kaufman to pervert the course of justice in an administrative proceeding (April 2, 2012 to March 24, 2014 - OAL: BDS 08959-2012N) that caused the illegal revocation of Kaul's license.

In a period from April 2012 to the present, Defendants Allstate/Northern Trust have perpetrated a **“pattern of racketeering”** through administrative/state/bankruptcy/district/state appellate/state supreme courts within the geographic boundaries of New Jersey, through the commission of the predicate acts mail fraud/fraud/bribery and public corruption.

Defendants Allstate/Northern Trust, in attempting to provide cover for the illegal activities of their criminal enterprise, have attempted to silence the entire political/judicial bodies of the United States, in an effort to prevent the disintegration of their market capitalizations.

In a period from approximately 1999, Defendants Allstate/Northern Trust developed a knowingly illegal system of public/judicial corruption, in which they extracted increasingly higher premiums from the public, while reducing monies paid to physicians who provided clinical care to their injured clients.

Commencing in approximately 2006, Defendants Allstate/Northern Trust employed this illegal system to have Kaul's medical license revoked, in order to manufacture an excuse to not pay him for clinical services he had provided to their injured clients.

Consequent to the illegal revocation on March 24, 2014 of Kaul's license, Defendants Allstate/Northern Trust expected Kaul to leave the United States. The Defendants, in the planning of their knowingly illegal scheme, used the US mail and wires, as well as face-to-face meetings to discuss with other state co-conspirators, the specifics of how they would use state/federal court systems to eliminate Kaul.



Defendants Allstate/Northern Trust in collusion and conspiracy with other co-conspirators identified in **The Kaul Cases** used the US mail and wires in an attempt to have the FBI indict Kaul, have him incarcerated and then deported.

Commencing in approximately 2012, Defendants Allstate/Northern Trust conspired with the NJ FBI field office/NJ AG to commence multiple criminal investigations into Kaul, with the sole purpose being to have him eliminated, in order to eradicate their debt to him.

From approximately 2012 to 2014, the FBI interviewed many Third Party Witnesses regarding Kaul. The investigation was eventually closed. **The Kaul Cases** Defendant Christie abused the power of the State of New Jersey and that of the local federal government in an attempt to have Kaul incarcerated, in conjunction with the illegal revocation of his license.

In a period from approximately 2008 to 2014, Defendants Allstate/Northern Trust funnelled bribes to Christie through public relation firms/political lobbyists/law firms as well as depositing bribes into off-shore trusts/bank accounts.

The bribes were part of a series of quid pro quo schemes in which Christie abused the power of the State of New Jersey to destroy Kaul's reputation/economic standing/professional career and attempt to destroy his physical/psychological/emotional welfare.

Up until February 22, 2016, Defendants Allstate/Northern Trust assumed that Kaul had been eliminated.

On February 22, 2016 Kaul filed K1, and Defendants Allstate/Northern Trust activated their long-standing scheme of judicial corruption in DNJ-N, in the belief that Kaul's prosecution of K1 would be obstructed by the Defendant judges.

Defendants Allstate/Northern Trust funnelled bribes to the Defendant judges, through law firms/public relation firms/political lobbyists and other as yet to be determined avenues of corruption.

The Defendant judges obstructed Kaul's prosecution of **The Kaul Cases**, using the above stated tactics, with the expectation that Kaul would cease his prosecution of the Defendants.

The Defendant judges and agents acting on their behalf conspired with Defendants Allstate/Northern Trust and their agents/lawyers through both digital/non-digital communications, purposed to further their knowingly illegal scheme of judicial corruption. The overarching purpose of this scheme was to conceal evidence of their decades-long criminal enterprise and to attempt to prevent Kaul from exposing evidence of the crimes they had committed against him.

Defendant Linares, shortly after having received a letter from Kaul in May 2019 regarding his financial disclosures/conflicts of interest/ex parte communications, relinquished his position as Chief Judge and joined the law firm of English and McCarter, a firm to whom he had granted many favorable judgments in the preceding decade.

Defendant Linares abused the power of the federal bench and conspired with the law firm of McCarter and English in furtherance of a quid pro quo scheme in which he rendered favorable judgments in return for a partnership position with the law firm.

Defendants McNulty/Wolfson/Vazquez/Dickson/Mannion have, in a period from at least 2016, engaged in a “**pattern of racketeering**” in the DNJ-N, in which they have through the commission of the predicate acts of bribery/mail fraud/wire fraud converted the DNJ-N into a racketeering enterprise, for the purposes of self-enrichment and the obstruction of Kaul’s prosecution of **The Kaul Cases**.

Defendants McNulty/Wolfson/Vazquez/Dickson/Mannion have been referred to state/federal investigatory/prosecutorial authorities by Kaul.

Defendants McNulty/Wolfson/Vazquez/Dickson/Mannion have used the US mail and wires, as well as face-to-face meetings to perpetrate their scheme of judicial corruption, in collusion and conspiracy with the other Defendants in this case.

Defendants McNulty/Wolfson/Vazquez/Dickson/Mannion, in the knowledge that all judges in DNJ-N have had some involvement in the racketeering schemes of Defendants Allstate/Northern Trust, recognized that no other judge would report their criminal conduct.

The Defendants in both this count and all other counts recognized that those judges who had not received bribes regarding **The Kaul Cases** had done so in other matters, and that their failure to report their crimes constitutes the crime of aiding and abetting.

The Defendants have been able to perpetrate their crimes for decades because no judge or lawyer will report the crimes, because they are either fearful of the professional consequences or because they have committed the same crimes in other cases. The Black Wall of Silence.

### **COUNT TWO - RICO**

#### **As to Defendants Leviss/McNulty/Mannion/Vazquez/Dickson/Linares/Wolfson**

Kaul incorporates the above evidence/facts/allegations into Count Two (2).

Defendant Leviss conspired and colluded with Defendants McNulty/Mannion/Vazquez/Dickson/Linares/Wolfson, in a period that commenced on or around April 19, 2016 to the present, to obstruct Kaul's prosecution of **The Kaul Cases**.

Defendant Leviss acted on behalf of counsel for all of the other Defendants in **The Kaul Cases** in furtherance of massive schemes of bribery/judicial corruption, in which the Defendants funnelled bribes through the NJ law firm of Berkowitz/Lichstein/Kuritsky/Giasullo, as part of a series of quid pro quo schemes purposed to obstruct Kaul's prosecution of **The Kaul Cases**.

Defendant Leviss used the US mail and wires, as well as face-to-face meetings to communicate information in furtherance of the Defendants crimes.

Defendant Leviss knew his actions constituted state/federal felonies punishable with jail terms in excess of ten (10) years, yet persisted because he believed that Kaul would eventually cease his prosecution of **The Kaul Cases**.

Defendant Leviss used the US mail and wires, as well as face-to-face meetings to communicate to counsel for **The Kaul Cases** Defendants, the substance of his communications with Defendants McNulty/Mannion/Vazquez/Dickson/Linares/Dickson.

Defendant Leviss communicated that Defendants McNulty/Mannion/Vazquez/Dickson/Linares/Wolfson had informed him that they would deny Kaul the right to discovery, deny any motions for Default/Summary Judgment, deny any motions to have any of **The Kaul Cases** transferred out of DNJ-N, in return for the continued receipt of bribes.

Defendant Leviss communicated that Defendants McNulty/Mannion/Vazquez/Dickson/Linares/Wolfson had informed him that they would deny Kaul the right to discovery, deny any motions for Default/Summary Judgment, deny any motions to have any of **The Kaul Cases** transferred out of DNJ-N, in return for

referring work to law firms/public relation firms/political lobbying firms in which either they or their relatives to the third degree held any measure of interest.

Defendant Leviss conspired and colluded with counsel for all Defendants in **The Kaul Cases** in the belief that the communications regarding the criminal schemes of bribery/judicial corruption would be protected under the doctrine of attorney-client privilege.

Defendant Leviss, in using his law firm to further a knowingly illegal scheme, has conferred on the firm liability pursuant to RICO.

Defendant Leviss, in failing to report the crimes of bribery/judicial corruption, has conferred on himself and his law firm the liability associated with the crimes of aiding and abetting a “**pattern of racketeering**”.

**COUNT THREE - RICO**  
**As to Defendants Wolfson/AA**

Kaul incorporates the above evidence/facts/allegations into Count Three (3).

Defendants AA had and have knowledge of the Defendants crimes of bribery/judicial corruption.

Defendants AA failed to report the crimes to state/federal investigatory/prosecutorial authorities, as they were fearful of professional retaliation and because they had committed the same crimes in other cases.

Defendant Wolfson conspired and colluded with Defendants AA using the US mail and wires, as well as face-to-face meetings to ensure they did not report the Defendants crimes to authorities.

Defendant Wolfson, as the Chief Judge in DNJ-N, aided and abetted the Defendants crimes by granting orders to transfer **The Kaul Cases** to corrupted judges in DNJ-N, with the purpose of obstructing Kaul’s prosecution of **The Kaul Cases**, and in the knowledge that the prosecution would expose highly incriminating evidence of Defendants Allstate/Geico/Northern Trust decades-long schemes of bribery/racketeering/judicial corruption.

Defendant Wolfson used the US mail and wires, as well as face-to-face meetings to communicate information to the other Defendants in furtherance of the Defendants crimes.

Defendant Wolfson used the US mail and wires, as well as face-to-face meetings to communicate information regarding the Defendants schemes, to certain judges in the United States Court of Appeals for the Third Circuit.

The substance of the communications between Defendant Wolfson and certain judges in the Third Circuit pertained to the Defendants scheme to attempt to prevent Kaul from litigating the case in either the district or appellate courts, with the intention of dissuading Kaul from prosecuting **The Kaul Cases**.

The AA Defendants recognition that the DNJ-N had been converted into a “**racketeering enterprise**” in a scheme of bribery/judicial corruption spearheaded by Defendants Allstate/Geico/Northern Trust, and their failure to report the crimes constitute the crime of aiding and abetting.

#### **COUNT FOUR - DEPRIVATION OF RIGHT UNDER COLOR OF LAW**

##### **As to Defendants Allstate/Geico/Northern Trust/McNulty/Mannion/Vazquez/Dickson/Linares/Wolfson**

Kaul incorporates the above evidence/facts/allegations into Count Four (4).

Defendants Allstate/Geico/Northern Trust, consequent to their corruption of Defendants McNulty/Mannion/Vazquez/Dickson/Linares/Wolfson and perpetration of a series of quid pro quo schemes, established a “**sympiotic**” relationship with state actors, and thus assumed the mantle/responsibility/liability of state.

Defendants Allstate/Geico/Northern Trust in becoming “**state actors**” did knowingly and with malice violate Kaul’s civil rights pursuant to section 1983 of the 1964 Civil Rights Act.

Defendants Allstate/Geico/Northern Trust violated Kaul’s civil rights in their pursuit of corporate /executive profit, and did so under color of law.

Defendants Allstate/Geico/Northern Trust’s criminal perversion of the course of justice was purposed to willfully and with malice/aforethought continue the violation of Kaul’s constitutional and civil rights, a scheme of violation that Defendants Allstate/Geico/Northern Trust commenced planning in or around 2009.

Defendants Allstate/Geico/Northern Trust conspired/colluded with **The Kaul Cases** Defendants to deprive Kaul of his basic human right to justice, in order to attempt to eliminate Kaul and the debt owed to him.

Defendants Allstate/Geico/Northern Trust colluded and conspired with Defendants McNulty/Mannion/Vazquez/Dickson/Linares/Wolfson to obstruct Kaul's prosecution of **The Kaul Cases** by denying him discovery, denying all motions for Default/Summary Judgment and staying all cases based on knowingly false legal opinions/orders, that are the products of bribery/judicial corruption.

Defendants Allstate/Geico/Northern Trust colluded and conspired with Defendants McNulty/Mannion/Vazquez/Dickson/Linares/Wolfson and certain members of the U.S.C.A. for the Third Circuit to deprive Kaul of his constitutionally protected right to prosecute **The Kaul Cases** by manipulating the procedural posture of the cases to prevent resolution and or examination by other courts.

The Defendants used the US mail and wires, as well as face-to-face meetings in DNJ-N to coordinate their scheme to violate Kaul's civil rights through the perpetration of a multi-pronged judicial racket of obstruction of justice.

The Defendants, in conspiring and colluding, to abuse the power of the federal judiciary, to engage in massive schemes of judicial corruption purposed to deprive Kaul of his civil and constitutional rights, have brought the DNJ-N into international disrepute and preclude it and the Defendant judges from any further involvement in any aspect of **The Kaul Cases**.

## **Relief**

The relief sought by Kaul includes that relief set forth on February 22, 2016 (**Exhibit 1**) in K1, in addition to the following:

1. This Court refer this matter to the FBI.
2. This Court refer the Defendant judges to the Judicial Disciplinary Council for the Third Circuit.
3. This Court recommends to the Judicial Disciplinary Council for the Third Circuit that for the pendency of this case, all Defendant judges be prohibited from any

further involvement in any cases involving Defendants Allstate/Geico/Northern Trust.

4. This Court recommends to the US Congress that any criminal convictions of healthcare providers/physicians procured in cases in DNJ-N based on allegations of health insurance fraud are immediately referred to a special prosecutor for examination of judicial corruption.
5. This Court enters an order of judicial notice that the **“New Jersey Insurance Fraud Protection Act (Section 17:33A-1-30) violates the Constitutions of the United States and of the State of New Jersey.”**

I, Richard Arjun Kaul, MD, do hereby certify and swear under penalty of perjury that the above evidence/facts/statements/claims are true and accurate to the best of my knowledge, and that if it is proved I knowingly and willfully misrepresented the facts, then I will be subject to punishment.



Dated: January 27, 2021

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Richard Arjun Kaul, MD

system, as part of their defense against Kaul's claims in **The Kaul Cases**, thus committing a massive 'Fraud on the Court'.

On March 8, 2019, Kaul filed a Notice of Appeal in the NJ Appellate Court, in which he stated:

**“Kaul filed a motion to recuse the judges, Kenneth Grispin and Mark P. Ciarrocca, based on unrefuted allegations of bribery”**

**“The Court erred when Judge Mark P. Ciarrocca failed to recuse himself, after Kaul filed a motion that alerted the Court to the fact that he had been appointed by Christopher J. Christie, Esq, the ex-governor of NJ, and an individual who is now a defendant in Kaul v Christie: 18-CV-08086.**

74. On March 14, 2019, **The Kaul Cases** Defendant, Allstate, as part of their illegal scheme, did have the Clerk of the Appellate Court **“raise the issue”** of whether Kaul had the right to appeal, as there allegedly remained other unadjudicated claims in the case. The case thus became stalled in the lower court, to give Ciarrocca just enough time to remove himself from the matter, but not before entering a knowingly illegal judgment of almost \$6 million against Kaul. On March 6, 2019, Ciarrocca was replaced by Judge Alan G. Lesnewich and a settlement conference was scheduled for April 4, 2019. **The Kaul Cases** Defendant, Allstate, through its scheme of judicial corruption obstructs/perverts the course of justice in state/federal courts within the geographic boundaries of New Jersey by co-opting the U.S.D.C(Newark)/U.S.C.A. 3rd Circuit and the Union County Court/State Appellate Court into entering orders that the corrupted judges know are purposed to obstruct Allstate's opposition from either procuring discovery and or prosecuting a case through the appellate courts. This occurred in K1, when U.S.D.J/K5 Defendant, Brian Martinotti dismissed the case on July 29, 2019, knowing that all claims had not been adjudicated and then the Third Circuit intentionally delayed its order till May 27, 2020, refusing jurisdiction, because all claims had not been adjudicated. The case, then came back under the jurisdiction of the district court (U.S.D.J./K11-3 Defendant Vazquez), who then waited till November 5, 2020 to dismiss the case, which is currently on appeal in the Third Circuit. Kaul describes this scheme in K11-3 as resembling the precept in Jean-Paul Satre's **“No Exit”**. The **“No Exit Scheme”**.

75. On March 3, 2021, Defendants Allstate/Geico filed a decidedly unhinged motion in K11-1 Defendant District of New Jersey-Newark, in front of K11-3 Defendant/U.S.D.J. Vazquez, that seeks to have entered an order that permits Defendants Allstate/Geico from not having to respond to claims filed by Kaul in other courts of the United States District Court. Bizarrely, Defendants Allstate/Geico admit that K1 is on appeal in the Third Circuit, but yet still believe Defendant DNJ-Newark has any jurisdiction, let alone jurisdiction over the entire United States District Court. It is noteworthy that the brief was only signed by counsel for Defendants Allstate/Geico. No counsel for any of the other K1 Defendants placed their signatures on this piece of legal desperation. It is also noteworthy that Defendant/U.S.D.J. Vazquez, in full knowledge that the law prohibits



January 7, 2021

Patricia S. Dodszuweit  
Clerk of the Court  
U.S.C.A. for the Third Circuit  
21400 United States Courthouse  
601 Market Street  
Philadelphia, PA 19106-1790

**Re: Kaul v Christie**  
**Case No. 20-3522**  
**District Court Number: 16-CV-02364 - K1**  
**Form AO 10 Disclosures**

Dear Ms. Dodszuweit,

On December 18, 2020, this Court entered a letter/order that invited the parties to file submissions regarding the issue of this Court's lack of appellate jurisdiction of the above matter.

In lieu of such a submission, I respectfully request that the Honorable Judges in this Court disclose to the record their forms AO10 and any other financial holdings/conflicts of interest that have any relation to the Defendants or any aspect/s of The Kaul Cases.

From the commencement of the proceedings to revoke my NJ medical license (April 2, 2012) to the present the Defendants have bribed both massive swaths of the administrative/state/federal judiciary and the body politic, thus violating, in an unprecedented manner, my fundamental human right to justice. I do believe, however, that the Defendants do not possess enough money to bribe the entire American judiciary, political body and every state/federal investigatory/prosecutorial agency, and I will, without question win The Kaul Cases (identified in enclosed Christie/Sweeney Admissions of Fact).

Regardless, in order to ensure the Defendants have not corrupted the U.S.C.A. for the Third Circuit, I do with the utmost respect for the rule of law require the judges disclose the aforementioned information forthwith.

Please also be informed that the United States District Court for the District of New Jersey (Newark) is a Defendant in Kaul v Federation - K11-1. The matter has been filed in the United States District Court for the Northern District of Texas. Submitted with this letter is a letter submitted to Chief Judge Freda Wolfson (January 7, 2021) that references the manner in which I dismantled yet another one of the Defendants' schemes to obstruct justice.

I thank you for your attention to this very serious matter.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'R. Kaul' with a stylized flourish at the end.

Richard Arjun Kaul, MD

cc: All Counsel via email.

All parties with a legal or other interest.

Mortimer Buckley, CEO, The Vanguard Group

Chief Judge Freda Wolfson

January 7, 2021

Chief Judge Freda Wolfson  
United States District Court  
District of New Jersey  
50 Walnut Street  
Newark, NJ 07102

**Re: Kaul v Federation: 20-CV-18853 - K5**  
**Arrest of Defendants + Defendants' Counsel by US Marshals.**

Dear Chief Judge Wolfson,

I write this letter to inform the United States District Court for the District of New Jersey that the Defendants have willfully, knowingly and in conspiracy violated the order issued on December 16, 2020 (D.E. 155) by this Court, in refusing to confer regarding a mandated Joint Discovery Plan.

On January 6, 2021 Kaul sent emails to Defendants' counsel, and received only two (2) responses. One from counsel for Defendant Allstate/Crist and the other from counsel for Defendant Congress of Neurological Surgeons. The cited excuses were: (i) the case is not assigned to Judge Donio; (ii) there is a pending application for a stay in the Newark district court.

The order is in effect and there has been no stay or modification of the order. Additionally, the Defendants know that the Newark district court is a Defendant in K11-1 (Kaul v Federation of State Medical Boards-United States District Court for the Northern District of Texas). This action precludes this court from any involvement, ever, (administrative/ministerial/adjudicative) in any cases related to me in any manner. Similarly, the Defendants know that Judges Vazquez/Dickson are subject to motions for disqualification, as they know that the U.S.C.A. for the Third Circuit issued a letter on December 18, 2020 (Case No. 20-3522 Document 9) that finds the Court lacks appellate jurisdiction. This latter point, that the outcome of a supposedly pending appeal will determine the outcome of K5, because (and now their argument betrays their utter

desperation) K1 and K5 are identical. The Defendants, as detailed in a letter you received from me on January 6, 2021, are foreclosed from applying for a stay. A copy of K11-1 was attached to this letter.

Thus, the Newark court is disqualified, Judges McNulty/Mannion/Martinotti/Vazquez/Dickson are disqualified and the Defendants are foreclosed from applying for a stay. However, the Defendants are ordered, pursuant to Rule 26(f) to confer at least twenty-one (21) days in advance of the scheduled conference on January 26, 2021, but have willfully violated that order.

I request that this Court: **(i)** enter an order of contempt and issue sanctions to include a referral to the Ethics Committee of their respective bars and monetary penalties; **(ii)** enter an order that deems the K5 claims to be proved; **(iii)** order that the United States Marshals Service immediately **arrest** the Defendants and their counsel and present them to this Court.

I would also like to inform this Court that the Defendants violations constitute undisputed facts/evidence that will be submitted in K11- in the United States District Court for the Northern District of Texas, in support of motions for summary judgment.

I thank you for your attention to this very serious matter.

Yours sincerely



Richard Arjun Kaul, MD

cc: All Counsel via email.

All parties with a legal or other interest.  
Mortimer Buckley, CEO, The Vanguard Group.  
U.S.C.A. for the Third Circuit.  
New York Times

[www.drrichardkaul.com](http://www.drrichardkaul.com)

September 5, 2020

Steven Sweeney  
Senate President  
New Jersey State Government  
935 Kings Highway  
Suite 400  
West Deptford, NJ 08086

**Re: The Kaul Cases**  
**Admissions of fact**

Dear Mr. Sweeney,

Please find below a series of statements regarding your participation in the illegal scheme that caused the suspension/revocation of my New Jersey medical license on April 2, 2012/March 12, 2014:

1. I admit that in a period commencing in or about 2008, I did knowingly/willfully abuse the power of public office and did conspire with the individuals named below, to have the New Jersey Board of Medical Examiners manufacture a false case against Richard Arjun Kaul, MD, the purpose of which was to: (a) have his medical license revoked; (b) destroy his economic standing; (c) destroy his reputation; (d) force him into a state of poverty so that he had no money to mount a legal defense; (e) cause him and his corporations to file for bankruptcy; (f) to force him and his family into a state of poverty; (g) cause him and his family to become homeless; (h) cause him to leave the country; (i) prevent him from ever finding employment anywhere in the world by attempting to destroy his online reputation; (j) eliminate the competition he presented to physicians who practiced in the minimally invasive spine surgery sector, from whom I received bribes; (k) eliminate the \$ 45 million debt owed to him principally by Allstate Insurance Company + GEICO; (l) obstruct his efforts at having his license reinstated in 2014 by demanding he first pay \$ 450,000; (m) threatening to suspend/revoke the licenses of any physicians who associated/worked/assisted or had any personal/professional relationship with Richard Arjun Kaul, MD; (n) harassing and intimidating every person that did work with Richard Arjun Kaul by having state employees making unannounced/threatening visits to their homes/offices/other places of work, during which they would interrogate these individuals; (o) increase the profits of Allstate Insurance Company + GEICO by creating an environment of fear/paranoia in which

physicians did not practice medicine and thus did not submit professional invoices; (p) cause Richard Arjun Kaul to be jailed on false charges of insurance fraud; (q) cause Richard Arjun Kaul to become the subject of over forty-four (44) lawsuits from patients + insurance companies; (r) encourage/coerce/direct former patients to file frivolous lawsuits against Richard Arjun Kaul, with the promise of profit and the purpose of attempting to persecute him into a state of psychological despair.

2. I admit that in a period commencing in or about 2008, I did consciously/willfully/maliciously violate the law and legal rights of Richard Arjun Kaul in perpetrating the illegal scheme detailed above, to which I have admitted.
3. I admit that in a period commencing in or about 2008, I did engage in hundreds of in person meetings/email exchanges/text exchanges/cell phone conversations/landline conversations with the individuals named below, to perpetrate the scheme detailed above, to which I have admitted:

Christopher J. Christie, Esq – Ex-governor of the State of New Jersey (2009-2017) and failed 2016 US Presidential candidate.

Philip Murphy – New Jersey Governor (2017 – Present).

Jeffrey Chiesa, Esq – 2012 Attorney General for the State of New Jersey + Partner of Chiesa + Shahinian + Giantomasi (Christie lackey).

Eric Kanefsky, Esq – 2012 Director of the New Jersey Division of Consumer Affairs + Partner of Kanefsky + Calcagno (Christie lackey).

Doreen Hafner, Esq – Deputy Attorney General.

Andrew Gregory Kaufman, MD – Medical expert for the State of New Jersey.

Gregory Przybylsky, MD – 2011 President of the North American Spine Society.

Robert Francis Heary, MD – Director of the Rutgers Neurosurgical Institute.

Marc Cohen, MD – Orthopedic Spine Surgeon.

Peter Staats, MD – President of American Society of Interventional Pain Physicians.

Lewis Stein, Esq – Now deceased partner at Nussbaum Stein Goldstein Bronstein.

Jay Howard Solomon, Esq – New Jersey Judge.

Kenneth Hollenbeck, Esq – Partner at Scarinci + Hollenbeck.

Kenneth Pringle, Esq – Partner at Pringle + Quinn + Anzano.

Jeffrey Quinn, Esq – Partner at Pringle + Quinn + Anzano.

David Saiber, Esq – Partner at Saiber Law Firm.

Geri Albin, Esq – Partner at Saiber Law Firm.

Stuart Rabin, Esq – New Jersey Supreme Court Justice.

Barry Albin, Esq – New Jersey Supreme Court Justice.

Joseph Vitale – New Jersey State Senator.

Michael J. Doherty – New Jersey State Senator.

Nelida Pou – New Jersey State Senator.

Nilsa Cruz-Perez – New Jersey State Senator.

Ronald Rice – New Jersey State Senator.

Sheila Oliver – Lieutenant Governor State of New Jersey (2017 - Present).

Gurbir Grewal – Attorney General for the State of New Jersey (2017 – Present).  
Jeffrey Posta – Deputy Attorney General for the State of New Jersey.  
Benjamin Hickey – Employee of Allstate Insurance Company.  
John Robertelli – Partner at Rivkin + Radler.  
Nicholas P. Scutari – New Jersey State Senator.  
Thomas Kean, Jr – New Jersey State Senator.  
Nicholas J. Sacco – New Jersey State Senator.  
Kenneth J. Grispin – New Jersey State Judge.  
John Sheridan – Judge on Bankruptcy Court for the District of New Jersey.  
Dennis Carey – New Jersey State Court Judge (retired).  
Kevin McNulty – Federal Judge on the United States District Court for the District of New Jersey.  
Brian Martinotti - Federal Judge on the United States District Court for the District of New Jersey.  
Robert Smith – New Jersey State Senator.  
Lawyers for Defendants in "The Kaul Cases" (please see below).

4. I admit that my admissions of corruption of the administrative/judicial/political processes/bodies in the State of New Jersey for the purposes of illegal political/economic gain have irreparably damaged the reputation of the State of New Jersey.
5. I admit that damage to the reputation of the State of New Jersey has rendered it a place in which American/Foreign businesses are reluctant to conduct commerce.
6. I admit that damage to the reputation of the State of New Jersey has rendered it a place in which American/Foreign businesses should not conduct commerce.
7. I admit that because of my corruption of the administrative/judicial/political processes/bodies in the State of New Jersey, I have deprived the public of their right to honest services from public servants.
8. I admit that I have embezzled monies/services from the State Tax Revenue/State which I have illegally/knowingly/willfully used for personal reasons, and not in the service of the public.
9. I acknowledge that my corruption of the administrative/judicial/political processes/bodies in the State of New Jersey will be publicized by Richard Arjun Kaul in his "An Impossible Victory" series of books/documentaries/movies/public speaking engagements, that commenced on April 15, 2020 and will continue for the remainder of his life (approximately 39 years).

10. I acknowledge that in my capacity as the president of the New Jersey senate, I have discussed you, your case and your application in 2018 for reinstatement of your license, with Governor Murphy.
11. I acknowledge that during these discussions I informed Governor Murphy that he should order the NJBME NOT to reinstate your license, as if he did, Allstate/Geico had threatened to expose the fact that I, along with many other state politicians/governors had engaged in a decades long scheme of public corruption/tax evasion.
12. I acknowledge that these bribes were transferred into off-shore trusts and bank accounts and that neither I nor any other state politicians paid taxes on this illegal income.
13. I acknowledge that I have read the Complaints (K1 + K2 + K3 + K4 + K5 + K6 + K7 + P1 + P2) and agree with ALL of the within allegations.
14. I acknowledge that I would be willing to testify in court as to the truthfulness of the allegations, as I have first-hand knowledge of the facts upon which they are based.
15. I acknowledge that I have read the twenty-two (22) motions for summary judgment filed in K1, and can verify the truthfulness/irrefutability of the evidence upon which they are based.
16. I acknowledge that I would be willing to testify in court as to the truthfulness of the evidence, as I have first-hand knowledge of its veracity.
17. I acknowledge that in my discussions with Governor Murphy regarding you, your case and your application for reinstatement of your license, he informed me that he had received a letter you dated March 24, 2020.
18. I acknowledge that in the letter you stated: **"Dear Governor Murphy – I write this letter to respectfully request that in the interests of public safety and that of saving lives, you immediately issue an executive order to the New Jersey Board of Medical Examiners to reinstate my medical license ... In short I have the ability to help save lives ... I write this letter with the utmost respect for the position of the governor's office, and in the sincerest hope that you put politics aside, put the people first ..."**
19. I acknowledge that Governor Murphy was advised by myself and others not to respond to your letter due to the political risk that Allstate/Geico would expose the decades long schemes of public corruption/tax evasion, in which I along with many other state politicians/governors had engaged.

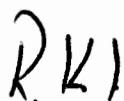


20. I acknowledge that political corruption of the NJBME by myself/other state politicians/Allstate/Geico was/is directly responsible for the COVID-19 pandemic related mortality/morbidity of the New Jersey public.
21. I acknowledge that had the New Jersey state government/NJBME/state politicians not permitted themselves to become corrupted by Allstate/Geico, then the NJBME would have detected the COVID-19 threat and forewarned the public.
22. I acknowledge that had the public been forewarned, thousands of lives would have been saved.
23. I acknowledge that Governor Murphy has used and is exploiting the COVID-19 pandemic for political gain, in that he capitulated to Allstate/Geico in ignoring your letter and ordering them NOT to reinstate your license in 2018, despite your expertise and despite the fact that the State of New Jersey desperately needed doctors to save lives.
24. I acknowledge that Governor Murphy has used and is exploiting the COVID-19 pandemic for political gain, in that on September 1, 2020, he signed into law Bill 2455, a bill that allows illegal immigrants to obtain licenses to practice medicine and surgery.
25. In my capacity as the senate president, a controlling member of the New Jersey democratic party and an individual who communicates daily with Governor Murphy, I acknowledge that his motivation for entering into law of Bill 2455 was to secure the vote of this sector of the New Jersey public for his 2021 campaign, in order to try and get re-elected to the office of the governor.
26. I acknowledge that Governor Murphy knows that Bill 2455 violates federal immigration law and that the United States Department of Justice has expressed its opposition to this illegal/politically motivated piece of legislation.
27. I acknowledge that Governor Murphy and members of his political team have manipulated the COVID-19 death related statistics, in order to give the false impression to the public that his policies have contained the pandemic. I know they have not, and that many people are still dying from lack of medical care, lack of adequate nutrition and lack of access to critical social services.
28. I acknowledge that if I fail to oppose in writing any the above admitted facts, they will become part of the public record as evidence in "**The Kaul Cases**" and the "**An Impossible Victory**" series of books/documentaries/movies/public speaking engagements. The latter material will be incorporated into "**Kaul Media**".
29. I acknowledge that my admission of the above facts provide the basis for: (i) the public to demand my immediate resignation from public office; (ii) the public to demand I publicly disclose the details of all bribes I received from Allstate/Geico/"**The Kaul Cases**"

Defendants for the entirety of my tenure as a public servant; (iii) the public to demand an investigation of corruption within the NJBME, the cause of COVID-19 mortalities; (iv) the public to demand that the NJBME be reformed, in order to bring it into compliance with the constitutions of the State of New Jersey and that of the United States; (v) the public to NOT vote for Governor Murphy in November 2021; (vi) the public to boycott Allstate/Geico in order to stop their corruption of administrative/political/legislative/legal bodies in New Jersey; (vii) the public to demand the SEC conduct an investigation of Allstate/Geico for manipulation of the global trading/equities market; (viii) the public to sell their shares in Allstate/Geico; (ix) the public to demand that all members of the administrative/legislative/judicial/political bodies in New Jersey deny/admit onto the public record whether within the last two decades they have received any bribes from Allstate/Geico; (x) the public to demand Governor Murphy explain why despite excessive profits, Allstate/Geico now charge the public excessive insurance premiums; (xi) the public to demand that Governor Murphy issue an executive order that permanently bars Allstate/Geico from conducting any further business in the State of New Jersey, and immediately revokes any/all of their business licenses, as they clearly constitute a lethal and "imminent threat" to the health and welfare of the New Jersey public.

This statement of admitted fact will be circulated to every state assemblymen/senator, and if by September 19, 2020, you fail to contest/rebut/refute/address in writing any of the above facts, they will become part of the legal/public record of "The Kaul Cases" and the public record of "Kaul Media".

Yours sincerely



Richard Arjun Kaul, MD

cc: New Jersey Assemblymen  
New Jersey Senators

**The Kaul Cases:**

1. K1 - Kaul v Christie: 16-CV-02364.
2. K2 – Kaul v Christie: 18-CV-08086.
3. K3 – Kaul v Schumer: 19-CV-13477.
4. K4 – Kaul v Stolz: 18-CV-01489.
5. K5 – Kaul v Federation: 19-CV-3050.
6. K6 – Kaul v Kaufman: State Criminal Indictment.
7. K7 – Kaul v Federation: 20-CV-01612.
8. P1 – Patel/Kaul v Allstate: 19-CV-08946.
9. P2 – Patel/Kaul v Crist: 19-CV-09232.

These cases can be viewed on [www.pacer.gov](http://www.pacer.gov)

**Kaul Media:**

**"AIV: Kaul v Christie"** – Audiobook/E-Book – Found on Scribd.

**"AIV: Kaul v Allstate"** – Release date: November 5, 2020.

**"AIV: Kaul v Federation"** – Release date: March 22, 2021.

**"AIV: Kaul v. Christie – The Story Within The Story: A Documentary Film"** – Found on YouTube.

**Public speaking engagements:**

**"AIV: Adversity Into Advantage"** - November 22, 2020 + March 22, 2021 + July 22, 2021+  
November 22, 2021.

[www.drrichardkaul.com](http://www.drrichardkaul.com)

October 8, 2020

**Attention:**

Defendant Christopher J. Christie  
Patient #  
Morristown Memorial Medical Center  
Morristown, NJ, USA.

**Residence:**

47 Corey Lane  
Mendham, NJ 07945

**Re: "The Kaul Cases" (US) + International Criminal Court (Europe) + Central Criminal Court (UK)**

Dear Defendant Christie,

This legal notice is being served on you personally, while you are resident at Morristown Memorial Hospital, Morristown, New Jersey in the United States Of America. It is my understanding that you are infected with the COVID-19 virus and have been held in hospital for the last five days. It is also my understanding that due to severe co-morbidities of asthma and obesity, you are at an exceptionally high risk of dying or suffering serious respiratory/neurological sequela.

As a Defendant you have a legal obligation to the court to tell the truth, and as a lawyer/ex-federal prosecutor you know your duty is to see justice done. Thus, please find below a series of admissions of fact:

1. I confirm that at this point in time I am compos mentis.
2. I have read and understand the claims filed against me by Plaintiff Kaul in the above referenced cases.
3. I confirm with complete certainty that the claims are true and admit my guilt in K1 + K2 + K5.

4. Having initiated and coordinated the racketeering schemes detailed within K1 + K2 + 5, I confirm with complete certainty that the claims against all Defendants are true.
5. I confirm that since the commencement of Plaintiff Kaul's prosecution of K1 + K2 + K5 on February 22, 2016, I conspired with members of the Office of the New Jersey Attorney General to obstruct his prosecution of the cases.
6. I confirm that this obstruction involved, amongst other things: (i) filing a knowingly false criminal indictment against Kaul in May 2016, in retaliation against Plaintiff Kaul for initiating the prosecution; (ii) conspiring with the ex-wife of Plaintiff Kaul to have him arrested/jailed on September 21, 2016 for unpaid child support; (iii) conspiring with US Senator, Charles Schumer, the brother-in-law of United States District Court judge, Kevin McNulty, to obstruct Plaintiff Kaul's prosecution of K1 + K2 + K3; (iv) conspiring in a period from 2011 to 2014, with Defendant Allstate/Geico, the FBI and the United States Department of Justice, to bring **false** criminal charges against Plaintiff Kaul for healthcare fraud, the purpose being to jail Plaintiff Kaul for over two decades; (v) tampering with witnesses, who have knowledge of my guilt and that of the Defendants; (vi) destruction of evidence of my guilt; (vii) threatening and or bribing the families of third-party witnesses/defendants with physical/economic/reputational harm, in order to suppress their testimony; (viii) in 2020, threatening and or bribing ACX/Amazon to not publish Plaintiff Kaul's audio-book "**An Impossible Victory: Kaul v Christie**"; (ix) conspiring with the Defendants to obstruct Plaintiff Kaul's application for medical licensure in the State of Pennsylvania + attempt to co-opt all state medical boards (2017 to the present) to deny Plaintiff Kaul a license, should he apply.
7. I confirm that in the event I die, my wife/children/estate will assume full unconditional liability for the claims/damages/exculpation of evidence.
8. I confirm that in my capacity as a federal prosecutor, I did wrongfully and for political purposes prosecute and convict in 2005, Hemant Lakhani, a seventy-year (70) old British based Indian salesman.
9. I confirm that I abused the resources of the American People/Government to conspire with Pakistani criminals and organized Russian crime syndicates to entrap Lakhani in a sting operation, that culminated in his false arrest in 2005 in a hotel at the Newark International Airport in New Jersey.
10. I confirm that Lakhani died in jail in 2013, as a consequence of the stress associated with his incarceration.
11. I confirm that Lakhani was interviewed in 2005 while in jail, by radio show: "**This American Life**" - <https://www.thisamericanlife.org/292/the-arms-trader/act-one-0>.
12. I confirm that I was involved in the trafficking of chemical weapon components to Syrian rebel forces in a period from 2012 to 2013.

13. I confirm that I knew these chemicals would be used to kill children + women + men in the Syrian civil war.
14. I confirm that I knew and know these chemicals did actually kill hundreds of children + women + men in the Syrian civil war, through asphyxiation and chemical burns to the lining of the lungs.
15. I confirm that I knew and know that the deaths of these innocent children + women + men was excruciatingly tortuous and painful.
16. I confirm the truth of the facts asserted by Plaintiff Kaul in the letter ("**ICC Letter**") he sent to the Chief Prosecutor at the International Criminal Court, dated November 11, 2015.
17. I confirm that I have read and understood the letter, a copy of which is attached to this admissions statement.
18. I confirm that I first read and understood this letter in late 2015, when Plaintiff Kaul publicized it.
19. I confirm that the reason neither I nor any of the parties referenced in the letter initiated legal action against Plaintiff Kaul, is because the asserted facts are true.
20. I confirm that I conspired with American state/federal politicians/judges to obstruct the efforts (2017 to present) of Plaintiff Kaul to have my crimes investigated.
21. I confirm that Plaintiff Kaul's dissemination in late 2015 of the "**ICC Letter**" to voters in Iowa + New Hampshire, contributed to the destruction of my political career.
22. I confirm that in approximately 2009 I abused the power of the Office of the New Jersey Governor to engineer the so called "**opiate epidemic**", in order to profit from companies that manufacture so called "**anti-opiate**" medications.
23. I confirm that I am on the board of a company called Pacira, a sham position for which I have received to date at least \$1,000,000.
24. I confirm that Pacira is a purported pharmaceutical company based in Parsippany, New Jersey.
25. I confirm that Pacira bribed me to improperly influence corrupted individuals within the United States Department of Health and Human Services to publish a Medicare billing code for the so called "**anti-opiate**" medication.
26. I confirm that I hold business interests in multiple drug rehabilitation companies and that I profit from the housing of citizens in these facilities, many of whom are not drug addicts, but have been ordered to these facilities by corrupted state courts/judges.
27. I confirm that the "**opiate epidemic**" is responsible for the deaths of thousands of chronic pain patients, who have been forced to resort to street-grade heroin in order to manage their severe pain.
28. I confirm that in a period from 2009 to at least 2014, I profited from for-profit juvenile detention centers and knew that the appalling conditions in the facilities were unlawful.

29. I confirm that because of these appalling conditions many young boys died, and that I obstructed claims brought by their bereaved families.
30. I confirm that I have received opiates to mitigate the hypoxia related pain I am now experiencing from COVID-19 induced respiratory inflammation and scarring.
31. I confirm that I believe this pain is substantially less than the pain experienced by the children + women + men murdered with chemical weapons in the Syrian Civil War.
32. I do submit myself to the jurisdiction of the International Civil Court for the crimes specified in the "ICC Letter" and will cooperate with any investigation.
33. I do submit that there exists sufficient evidence to convict me of murder/manslaughter/crimes against humanity in courts of both the United States and foreign jurisdictions. I do submit that I have knowledge that would exonerate Julian Assange and would testify in the proceedings at the Central Criminal Court, London, UK ("Old Bailey"), if subpoenaed by his legal advocates.

Please be advised that if by October 15, 2020 you have not denied these admissions of fact, they will be deemed admitted and submitted into: (I) The United States District Court (DNJ + DC + Third Circuit + DC Appellate Court + SCOTUS); (II) The International Criminal Court; (III) The Central Criminal Court; (IV) The Indian High Court, as evidence of the truthfulness of the claims of Plaintiff Kaul + your guilt + probative value to pending legal proceedings.

Dated: October 8, 2020

\_\_\_\_\_  
Christopher J. Christie

cc: Jennifer Robinson - Barrister-at-law (Assange)  
Doughty Street Chambers  
J.robison@DoughtyStreet.co.uk  
54 Doughty Street  
Fitzton, London WC1R 2LS  
U.K.  
+44 20 7404 1313

R.KI  
4 RICHARD ARJUN KAUL, M.D.  
October 8, 2020

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF COLUMBIA**

RICHARD ARJUN KAUL, MD

Plaintiff

v.

FEDERATION OF STATE MEDICAL BOARDS, ET AL

Defendants.

CIVIL ACTION: 20-CV-01612-TSC

CERTIFICATION OF DINA M. KAUL

RICHARD ARJUN KAUL, MD  
440 c SOMERSET DRIVE  
PEARL RIVER, NY 10965  
862 881 9703  
drrichardkaul@gmail.com

Dina M. Kaul hereby certifies to the Court as follows:

I am fifty-one (51) years of age, a United States citizen and the mother of the children of Richard Arjun Kaul, MD ("**Plaintiff**").

I submit this affidavit in support of the claims and damages sought in the following cases:

K1-Kaul v Christie: 16-CV-02364

K2-Kaul v Christie: 18-CV-08086

K3-Kaul v Schumer: 19-CV-13477

K4-Kaul v Stolz: 18-CV-01489



K5-Kaul v Federation: 19-CV-3050

K6- State criminal indictment v Defendant Kaufman

K7-Kaul v Federation: 20-CV-01612

P1-Kaul/Patel v Allstate: 19-CV-08946

P2-Kaul/Patel v State of New Jersey/Crist: 19-CV-09232

A copy of this affidavit has been submitted into each of the above cases (**The Kaul Cases**)

On October 9, 2020 I spoke with Richard Arjun Kaul regarding various issues that pertain to the above cases. The following represents this telephone conversation, which lasted approximately one hour,. The conversation has been organized into six (6) sections to facilitate interpretation.

**Section index:**

- A. Defendants' malicious violation of my maternal rights.
- B. Foreclosure of home + Deprivation of child support.
- C. Lawsuits + Bankruptcy.
- D. Defendants burglaries of Bernardsville home + Attack on Plaintiff's Surgical Center.
- E. Sheriffs.
- F. Claim Evidence.

**A. Defendants' malicious violation of my maternal rights**

1. I am the mother of two children, a boy and a girl, aged 18 and 15.
2. Both my children and I have suffered immensely, and continue to suffer because of the Defendants criminal scheme, as described in the above cases.
3. Our pain has been emotional, psychological and physical and is ongoing.

4. I submit this affidavit as a single mother and a woman who has desperately struggled since 2012 to raise two young children in the face of the Defendants malicious, relentless vendetta to destroy the life and reputation of my ex-husband, the Plaintiff.
5. The Plaintiff and I separated in 2005 and became divorced in 2009. He faithfully fulfilled all of his legal obligations under a property settlement agreement that we signed in 2005.
6. I find it incomprehensible that the Defendants attacked my children and I in the most vicious manner, in a period that commenced in 2012.
7. I also find it morally repugnant and reprehensible that the Defendants so perverted the process of justice, ethics and standards of basic human decency, in order to destroy my life, my children's lives and that of my ex-husband.
8. I have the utmost respect and admiration for the Plaintiff in the manner in which he has prosecuted the Defendants in his pursuit of justice.
9. To illustrate the character of the Defendants, mostly white privileged males, I make reference to the fact that I have worked as an administrator in the construction industry for twenty (20) years, and have never witnessed criminal conduct to the extent evident in the above cases.
10. I have dealt with teams of construction workers, mostly working class men, who are honest and would never do anything to intentionally harm women or children.
11. On several occasions I described the Defendants' crimes and their malicious scheme to intimidate, harass and attempt to destroy my life and that of my children.

12. On several occasion, these men described the Defendants misconduct as **“appalling”** and on one occasion, one individual described these men as **“heartless scumbags”**. He then went on to describe the manner in which he would have dealt with these individuals if they had attacked his family and children.
13. The Defendants violated my maternal rights, in that because of their relentless and vicious scheme, I was forced to fight just to survive, and was therefore deprived of time with my children. This is time that was so cruelly taken away from my children and I, time that I can NEVER get back.
14. To this day I cannot even begin to comprehend why these Defendants conspired to attack, and did attack my children and I. Even hardened criminals and members of the mafia have a code of conduct with regards to women and children.
15. The Defendants have stolen my sense of security and my children’s sense of security. They do not feel safe at home or at school, because of the emotional, psychological and physical trauma that the Defendants have caused them. These individuals, wealthy, white and in positions of power, have stolen my children’s childhood. Sometimes, when I think about the heinous crimes committed by the Defendants I want them to suffer, but I wish no harm on their wives or children, in the way that they did on my children and I.
16. To this day, I cannot fathom the evil that possessed the Defendants to commit the crimes they committed. I find it incomprehensible that it all stemmed from professional jealousy. If that is in fact the case, then the Defendants will need psychiatric help in jail.
17. I have read the affidavit of John Zerbin (K1-D.E. 205), and it sickens me, to know that Defendant Doreen Hafner, a deputy attorney general for the State of New Jersey, maliciously intended to destroy the lives and my children and I ( copy attached). I don’t have the words to express how much pain she has caused me and

my innocent children, but I know justice will punish her and the other Defendants for the evil they perpetrated. I hope they rot in jail, so that no other mother and no more children will ever be subjected to the torture that my children and I have endured since 2012.

18. The facts detailed in this affidavit are just the 'tip of the iceberg'. There is so much more, but it is very painful at this time for me to talk about these atrocities, let alone write about them. It has taken me many years to develop the courage to submit this affidavit. I wanted to leave everything in the past, and not think about the agony to which my children and I were subjected by the Defendants, but the Plaintiff, the father of my our children, told me, "**that I must face the past, in order to find the future**".

19. The Plaintiff is a brilliant and courageous man. The Defendants are greedy bullies, cowards and abusers of innocent women and children. These individuals are despicable.

20. I am extremely angry about the immense and permanent injuries the Defendants have caused to my children and I, and for what. Because they were jealous of the Plaintiff's professional success. The Defendants have tormented my children and I since 2012, because they wanted to destroy him and everyone in his life. I imagine that these individuals sat down in a room, on many occasions, and planned every detail of their illegal scheme, including rackets intended to abuse the legal system in order to exact an inhumane degree of psychological pressure on the Plaintiff. The purpose of these rackets was to have the Plaintiff die, be jailed or flee the country. The Plaintiff has enormous mental fortitude, a profound hate of injustice, an indomitable will and an undying love for his children. He is a hero, who has publicly exposed the Defendants' as bullies, cowards and in all truth, individuals that deserve to be eliminated from society.

**B. Foreclosure of home + Deprivation of child support**

21. In December 2003, the Plaintiff and I jointly purchased a home in Bernardsville, New Jersey, in which I invested the entirety of monies derived from the sale of my studio apartment in Manhattan.
22. From December 2003 to August 2016, I lived in the house with my two young children, who were aged thirteen (13) and nine (9) when we were evicted due to bank foreclosure.
23. The foreclosure of the Bernardsville house was a direct consequence of the Plaintiff's sudden inability to provide child and pay the mortgage. These were a consequence of the immense economic hardship caused to the Plaintiff by the widely publicized suspension/revocation (2012/2014) of his New Jersey medical license.
24. As a consequence of the license suspension, I stopped receiving child support in March 2013.
25. As a consequence of the license suspension, the Plaintiff stopped paying the mortgage in April 2013.
26. As a consequence of the suspension, my children's education was abruptly interrupted and they were forced to leave the school in which they had studied since the ages of seven (7) and five (5). This event was extremely traumatic for them.
27. As a consequence of the foreclosure proceedings, and my lack of child support, I was forced to sell all possessions in the house. This sale occurred in June 2016, and resulted in the total loss of my possessions, my children's possessions and those possessions in the house that belonged to the Plaintiff.

28. As a consequence of not having received child support/alimony since March 2013, I was forced into a state of poverty, which caused me to file for personal bankruptcy on May 13, 2015.
29. As a consequence of my filing for personal bankruptcy, my financial credit score was reduced to less than 550, and upon the eviction of my children and I from our home, I was unable to secure a rental property. My children and I were forced into a state of homelessness and poverty.
30. As a consequence of the foreclosure and deprivation of child support, my children have suffered immense psychological, emotional and physical injuries that are ongoing.

**C. Lawsuits + Bankruptcy**

31. On May 13, 2015, I was forced to file for personal bankruptcy due to multiple liens and judgments levied against my name.
32. The judgments and liens were a direct consequence of lawsuits filed against me and the Plaintiff by amongst others, Defendant Stein.
33. In March 2014, Defendant Stein attempted to have me and my two children evicted from our home.
34. I was forced to retain a lawyer, but because I had not received any child support/alimony since March 2013, I had no money and my retired parents used their pension to pay the legal fees.
35. In December 2003, the Plaintiff and I jointly purchased the house, and it remained in both of our names after our divorce in May 2011.

36. It is my understanding that in approximately late 2013, Defendant Stein misrepresented to the Morris County Court that the Plaintiff retained sole title of the house, in order to have the court enter an order of eviction.
37. Had an order of eviction been entered in 2014, my children and I would have been left destitute and homeless.
38. As a consequence of the suspension/revocation the Plaintiff, in late 2012, became unable to pay the school fees for our children.
39. In late 2012 the Plaintiff and I met with the school administrators to discuss our situation, in the hope that our children's departure from the school would not be sudden. To this effect my parents used monies from their pension.
40. However, in mid 2014, the school filed a lawsuit against the Plaintiff and I, in which it made false claims that we owed it money.
41. Neither the Plaintiff nor I had the money to defend the claims, and consequently, a default judgment was entered against both him and I.
42. It is my understanding that the school (Far Hills Country Day School) also filed a claim in the Chapter 11 bankruptcy proceedings (13-23366-DNJ) initiated by the Plaintiff's corporations on June 17, 2013. I have no knowledge as to whether the claim was paid.
43. It is my understanding that the school, consequent to the widely publicized suspension of the Plaintiffs license on June 13, 2012, entered into a series of communications with members of the administration of Defendant Christie/New Jersey Attorney General.

44. In the aforesaid communications the school administrators were informed that the FBI were investigating the Plaintiff, and that he would be indicted and convicted.

45. It is my understanding that as a consequence of these communications, the school decided to file a lawsuit, in the belief that the Plaintiff would either die, be jailed or leave the country.

46. It is my understanding that the school colluded and conspired with the aforesaid parties to file a lawsuit, with the intent and purpose of facilitating the illegal schemes the Plaintiff has detailed in his federal lawsuits ("**The Kaul Cases**").

47. It is my understanding that the conspiracy was purposed to destroy the Plaintiff's livelihood and reputation.

48. From April 2012 to late 2016, insurance companies (Allstate/Geico), banks and ex-patients named me as a defendant in multiple lawsuits they filed against the Plaintiff.

49. I had no money to defend the aforesaid claims and as a consequence multiple default judgments were entered against me. These detrimentally affected my credit score and made it impossible for my children and I to secure a rental property upon eviction, in 2016, from their childhood home.

50. As a consequence of the aforesaid judgments/liens/levies I was forced to file for chapter 7 bankruptcy on May 13, 2015.

51. As a consequence of the aforesaid judgments/liens/levies my personal bank account was 'frozen'.

52. On June 26, 2015 I attended a creditors meeting in Trenton, at which the trustee, Daniel M. Straffi, interviewed me.



53. I specifically remember that the majority of the questions pertained to personal and professional matters regarding the Plaintiff. Straffi repeatedly asked me why I had agreed to the terms of the Property Settlement Agreement that the Plaintiff and I signed in 2005.
54. It is my understanding that Defendant Stein, members of the administration of Defendant Christie and Office of the New Jersey Attorney General had conspired/colluded with Steffi to focus his questions on the property settlement agreement.
55. Straffi initially objected to my application to file for chapter 7 bankruptcy
56. It is my understanding that the purpose of these particular questions was an attempt to improperly facilitate the effort of Defendant Stein to have me and my children evicted from our home.
57. When I informed my lawyer as to what I believed was a bizarre line of questioning from Straffi, he failed to disclose that he too had been co-opted by members of the Office of the New Jersey Attorney General and the administration of Defendant Christie.
58. I was separated from the Plaintiff in 2005 and divorced in 2009.
59. I now believe that there existed from 2012 to 2016 a conspiracy by the Defendants to have the Plaintiff die, be jailed, deported and or destroy his reputation and livelihood.

**D. Defendants burglaries of Bernardsville home + attack on Plaintiff's surgical center**

60. It is my understanding that in 2006 the Defendants commenced their scheme to have the Plaintiff's license revoked, and that on February 3 2010 Defendant New Jersey Board of Medical Examiners interviewed him about his practice of minimally invasive spine surgery.
61. In October 2010 my home was burgled, while my children and I were away from the house.
62. Upon returning to the house, I immediately noticed that the entire front door had been destroyed, that there were footprints throughout the house and that every room, including my children's bedrooms, had been ransacked. Cupboards had been emptied, draws flung to the floor, rugs pulled up and it was apparent that the intruders had attempted to access my computer. I filed a police report.
63. The burglary terrified my children, who at the time were aged eight (8) and six (6). My son began having difficulty sleeping at night and experienced frequent nightmares, from which he would wake in a state of panic. He also had difficulty concentrating at school and on his homework, as he believed there would another burglary.
64. In June 2013 there was indeed another burglary, that was conducted in the same manner as the previous one. However, on this occasion my computer was left abandoned in the hallway, and I believe that the intruders were in the house as I entered the cul-de-sac on which it was located. I filed a report with the police.
65. It is my understanding that this burglary coincided with an attack on the building in which the Plaintiff's surgical center was located, at 111 Wanaque Avenue, Pompton Lakes New Jersey. This was the NJSR Surgical Center.

66. It is my understanding that the building sustained enormous water damage from a fractured pipe. This occurred in June 2013, at a time when the Plaintiff was attending the medical license hearing in the New Jersey Office of Administrative Law (April 9, 2013 to June 28, 2013).

**E. Sheriffs**

67. From April 2012 to mid 2016, just after the Plaintiff filed a RICO claim against the Defendants, armed Sheriffs officers frequently appeared at my home, to serve legal papers for the Plaintiff. This occurred on a monthly basis.

68. On each and every occasion I informed these individuals that the Plaintiff had not lived at the house since 2005, and almost every time the person insisted that he did.

69. On multiple occasions the individual screamed at me, while my children stood behind me in a state of utter panic. On a number of occasions my son asked me if I and or the Plaintiff, their father, were going to jail.

70. On a number of occasions the individual threw the papers into the hallway of my home. My children witnessed these acts.

71. These events stopped shortly after the Plaintiff commenced legal action against the Defendants.


**F. Claim Evidence**

72. A family member of mine involved in the New Jersey healthcare sector, an individual with direct knowledge of the Defendants' crimes, has confirmed to me the truthfulness of the Plaintiff's claims.

73. The Defendants crimes have had an enormous impact on the lives of my children, that continues to this day, and I believe they should be held accountable for their malicious and criminal wrongdoing.

I certify that the above statements made by me are true. I am aware that if any of the above statements are willfully false, I will be subject to punishment.

Dated: November 9, 2020

A handwritten signature in black ink, appearing to read 'Dina M. Kaul', written over a horizontal line.

Dina M. Kaul

[www.drrichardkaul.com](http://www.drrichardkaul.com)

May 3, 2021

Margaret Weigand  
Circuit Executive  
OFFICE OF THE CIRCUIT EXECUTIVE  
United States Third Circuit  
601 Market Street  
22409 United States Courthouse  
Philadelphia, PA 19106-1790

**Re: Complaint of Judicial Misconduct or Disability**  
**J.C. No. 03-21-90023**

Dear Ms. Wiegand,

Thank you for your letter dated March 23, 2021 regarding the above matter.

I submit this letter as part of this record, to assert that Judge John Michael Vazquez is continuing to knowingly violate Canons 1, 2 and 3 of the Code of Judicial Conduct, in entering orders in cases in which he knows the law prohibits him from doing so. His misconduct has reached a criminal standard.

I will, within the next week, be moving in the U.S.C.A. for the Third Circuit, for various forms of relief in The Kaul Cases, including the transfer of cases out of the U.S.D.C. for the District of New Jersey, and the disqualification of Judge John Michael Vazquez. In this regard, I respectfully request that the Chief Judge of the U.S.C.A. for the Third Circuit be informed of the above matter, due to its relevance to the relief that I will seek. If, however, the matter is already known to the Court, please inform the Honorable Judges of the ongoing violations, and their effect of illegally obstructing my access to justice in America. This point is relevant to international prosecutions.

I believe it is important for this committee to know that on May 3, 2021, I filed a lawsuit in the Indian High Court, against Defendants State of New Jersey/Allstate Insurance Company/Allstate-India/Christopher J. Christie, on charges of having violated my rights under

the Indian Constitution and Anti-Corruption Act (1988). Discovery will commence within five (5) weeks on all matters pertaining/relating to The Kaul Cases.

Yours sincerely

A handwritten signature in blue ink, consisting of the letters 'R.' followed by 'K.' and a period.

Richard Arjun Kaul, MD

Holding/Conclusion: Venue calculations give less weight to plaintiff's preference when there is no evidence of any contact/injury /residence nexus with the forum. The holding, as applied to the facts of K11-2, establishes personal jurisdiction over the Defendants.

**THE COURT HAS THE AUTHORITY TO ORDER THE IMMEDIATE REINSTATEMENT OF KAUL'S NEW JERSEY LICENSE**

This Court, pursuant to Article III has the power to order the immediate reinstatement of Kaul's NJ license, and remedy the ongoing violation of his constitutional rights. The relief is the functional equivalent of a petition for a writ of habeas corpus, interpreted in light of the interchangeable constitutional concepts of life, liberty and property. In illegally revoking Kaul's license, a property right, the Defendants did cause an illegal loss of his liberty, and thus Kaul has been wrongfully imprisoned since April 2, 2012, an imprisonment that the Defendants have maliciously perpetuated with knowledge of its illegality. Kaul has provided the Defendants multiple opportunities to remedy the illegal imprisonment, and not only have the Defendants rejected these opportunities, but they have recruited other state medical boards/healthcare agencies to perpetuate Kaul's imprisonment. The evidence proves the premeditation of this massive ongoing crime.

**THE PERFECT STORM:**

The predicament in which the Defendants find themselves is the progeny of a scheme for tyrannical domination of American healthcare/so called "providers" (physicians/nurses/other professionals with greater than eleven (11) years education/training), that commenced in 1986 with HCQIA. The scheme has been orchestrated by the "Federation Cartel" ("FC") and "Hospital-Insurance-Pharmaceutical Industrial Complex" ("HIPIC"), in which state medical boards, state/federal investigative/prosecutorial agencies/courts and state/federal governments have been converted into one massive "racketeering enterprise" the only purpose of which was and is to increase corporate/executive profit at the expense of the health/welfare/freedom/lives of the American public/medical profession. In essence, the "HIPIC-FC" collaborators have converted the United States into their "racketeering enterprise"

the sole purpose of which is to increase the value of the New York Stock Exchange, through essentially a process of human trafficking. Since its inception, the various covers for the **“FC-HIPIC Scheme”** have included false allegations of: (i) prescribing outside the **“bounds of usual medical practice”** and for an illegitimate medical purpose; (ii) **“gross deviations”** from the standard of care; (iii) filing false insurance claims; (iv) so called **“boundary violations”** for supposed inappropriate relations with patients; (v) supposed lack of **“good moral character”**. The various covers, to a greater or lesser extent, all mimic the simple allegation of a Salem woman being called a witch, being asked to prove she is not a witch and then being dropped into a river/lake to see if she drowns or floats, and if she floats, then being burnt at the stake. The motivation in 1693 was power, the method the law. In 2021 the motivation is power and profit, the method the law. The operative elements responsible for the Defendants unprecedented predicament stem from the worlds of medicine/business/law/politics, and the timing of their predicament (2021) is a consequence of an unprecedented intersection of these elements, which are: (i) Kaul’s life circumstances permitting him to acquire knowledge of the law, and the time to use that knowledge to prosecute the Defendants – if Kaul’s license was not suspended/revoked in 2012/2014, this element would not have come into existence; (ii) the Defendants conspiracy to destroy Kaul by having him driven into a state of poverty/jailed/killed – if the Defendants had no criminal motive, no malice, more morality, more intelligence, more compassion, more humanity, more courage, less greed and had simply had Kaul’s minimally invasive spine surgery independently analyzed for clinical outcomes, this element would not have come into existence; (iii) the current system of political campaign financing that commenced consequent to Citizens United (2010), which motivated Defendant Christie to commit massive crimes – if SCOTUS had not defined corporations as **“persons”** entitled to limitless donations, then Defendant Christie’s cost-benefit analysis to commit crime would have argued against it, and this element would not have come into existence; (iv) the current system of state reciprocity of actions against physicians licenses, whereby when a physician loses a license in one state, he automatically loses/prevented from obtaining a license in any other state, which under the law then provides him the right to file a **“new injury”** claim in that state – if the law made illegal the **“FC-HIPIC Scheme”**, the regulation of medicine would return to a



sovereign state based system (pre 1986), in which for-profit corporations/politicians would be prohibited from having any involvement, and in which each state would adjudicate actions against a physician's license based solely on the evidence of his clinical practice/patient outcomes for the totality of the practice. Thus, the loss or inability to procure a license in other states would be based on the empirical objective evidence of outcomes/complications compared to those quoted in the medical literature. A scientific, not Salem, approach for a profession based in the empirical method, that would isolate the "initial" injury from any "new" injury and abridge the right to file a "new" claim against parties alleged to have caused the "initial" injury. The "FC" conspires with its state medical board members to claim sovereign immunity if sued, but funnels bribes to individuals in controlling board positions, whom the "FC" has had appointed by politicians whom they bribe, the overall purpose being to deprive state medical boards/members of their sovereign adjudicatory authority and coerce them to obey the political/economic agendas of the "FC-HIPIC Scheme". The ultimate goal is corporate/executive/NYSE profit, which extends into the trillions. E, any one of the above elements had not come into existence, the Defendants would not now be in the 'eye' of THE PERFECT STORM. The insurance industry, in response to The Kaul Cases, has ramped-up its "War on Doctors" with increased physician prosecutions, and is using the threat of lengthy jail terms to force physicians into signing plea agreements, in which they give up the right to ever re-apply for license anywhere in the United States. See African-American Dr. Nelson Onaro: "He also agreed in the plea deal to refrain from applying for new licenses or seek reinstatement of his licenses to practice as a medical doctor in the United States." [www.mcalesternews.com](http://www.mcalesternews.com) July 1, 2021. Ultimately the first step towards ending these atrocious human rights violations and ensuring the NYSE is never again entrapped in such a situation, is a "Reformation of American Medical Boards". The Defendants, after perpetrating a thirty-five-year long scheme, cannot now bemoan the predicament, one of their own making, in which they are now trapped.