

IN THE ALLAHABAD HIGH COURT

RICHARD ARJUN KAUL, MD

Plaintiff

v.

Plaint No.

ALLSTATE INSURANCE COMPANY
/ALLSTATE INDIA
STATE OF NEW JERSEY
CHRISTOPHER J. CHRISTIE

Defendants.

I, Richard Arjun Kaul, a citizen of India and a party-in-person plaintiff, do hereby swear under oath that the following facts are true and accurate to the best of my knowledge.

I do hereby submit this Plaintiff seeking the monetary relief identified in **Exhibit 3.**

Plaintiff:

1. RICHARD ARJUN KAUL, MD
INDIA – NEW DELHI
US – NEW YORK
drrichardkaul@gmail.com

Defendants:

1. ALLSTATE INSURANCE COMPANY/ALLSTATE INDIA
INDIA – RMZ ECOWORLD, 7TH FLOOR, BUILDING NO.1
DEVARABEESANAHALI VILLAGE, VARTHUR HOBLI
BANGALORE – 560 103
USA – 3100 SANDERS RD, NORTHBROOK, IL 60062
2. STATE OF NEW JERSEY
125 W STATE STREET, TRENTON NJ 08608, USA
3. CHRISTOPHER J. CHRISTIE
47 COREY LANE, MENDHAM, NJ 07945, USA

Evidence

Attached as Exhibits 1 to 3 is evidence in support of this Plaintiff:

1. **Exhibit 1**: Complaint in Kaul v Murphy: 21-CV-439-K11-4: U.S.D.C.-District of Connecticut.
2. **Exhibit 2**: Complaint in Kaul v Allstate: 21-CV-736-K11-3: U.S.D.C.-District of Northern Illinois.
3. **Exhibit 3**: Settlement Terms in Kaul v Christie: 16-CV-02364-K1: U.S.D.C. of New Jersey
4. **Exhibit 4**: Injuries caused by Defendants to Kaul's economic standing/reputation/livelihood/family. In July 2015 Kaul, living in a state of poverty, sustained two severe epileptic seizures that almost caused his death. He sustained a massive complex laceration to his tongue, that required emergent surgical correction to stem the profuse bleeding.
5. **Exhibit 5**: Articles regarding corruption in the United States.

The Defendants have illegally deprived Kaul of almost a decade of his professional life (April 2, 2012 to present) and continue to refuse to admit to their guilt or correct their wrongdoing.

At this point in time there are approximately one hundred and forty-four (144) Indian physicians in American jails, and a far greater number that have been permanently deprived of their livelihood. The Defendants have played a significant role in a large percentage of these cases.

Preliminary Statement

Plaintiffs Dr. Harshad Patel and Richard Arjun Kaul, MD, bring this action against Defendants: **CHRISTOPHER J. CHRISTIE (“Christie”) + STATE OF NEW JERSEY (“NJ”) + ALLSTATE INSURANCE COMPANY (“Allstate”)** seeking compensation for economic + reputational + professional + personal injuries, inflicted on plaintiffs consequent to defendants’ twenty-two (22) year policy of racial discrimination against physicians and medical providers (hereinafter “**healthcare providers**”) that are either of Indian citizenship or of Indian origin.

Plaintiff Kaul is a citizen of India and a permanent resident of the United States. Plaintiff Patel is a citizen of the United States who emigrated from India to the US in 1986 and has Non-Resident Indian status. Plaintiffs Kaul and Patel bring this action based upon defendants multiple and concerted violations of Plaintiffs legal rights under the Indian Constitution. The Plaintiffs’ allegations are based on their own experiences and personal knowledge, their research, publicly available articles, studies, reports and other sources, a reasonable inquiry under the circumstances, and on information and belief. The Plaintiffs’ allegations are likely to have further evidentiary support after a reasonable opportunity for further investigation and discovery.

The Defendants premeditated and prolonged violation of the Plaintiffs rights, and their knowingly illegal/malicious use of the internet to propagate the products of these crimes, has caused specific injuries to Plaintiffs Kaul and Patel in India. These include but are not limited to: **(i)** Kaul’s inability to obtain registration with the Indian Medical Council consequent to the illegal suspension/revocation (April 2, 2012/March 24, 2014) of his New Jersey license, and: **(ii)** his inability to obtain any form of employment anywhere in the world, because of the immense/permanent damage caused to his reputation by the Defendants knowingly illegal use of the internet to propagate information about the products of their crimes; **(iii)** Patel’s ability to expand his business in India because of the Defendants malicious/willful use of the internet to propagate knowingly false information about Plaintiff Patel.

The Defendants crimes have also caused a deprivation of Indian physicians right to be trained by Kaul, an internationally recognized pioneer/expert in minimally invasive spine surgery.

This case is brought to expose and have held liable those defendants, who are alleged to have engaged in a twenty-two (22) year concerted scheme of racial discrimination against healthcare providers who are either Indian or of Indian descent. Defendant Allstate, through a prolonged period of bribery that commenced in approximately 1998, has purchased the state government of Defendant State of New Jersey, and certain corrupted state courts. The defendants have conspired and colluded to perpetrate their schemes of racial discrimination, that have involved targeting Indian healthcare providers for administrative, civil and criminal prosecutions.

Jurisdiction

This Court has jurisdiction over this matter as all: **(i)** Defendants have used the internet in the commission of their crimes; **(ii)** Defendants have conducted or conduct business, directly or indirectly within the jurisdiction of India; **(iii)** Defendant Allstate has submitted itself to the jurisdiction of India.

Statement of Fact

1. The Defendants conspired to use the internet to attempt to illegally destroy the Plaintiffs liberty, livelihoods, reputations and ability to exist/support their families, in order to prevent them finding work/employment anywhere in the world, including the country of their birth.
2. The Defendants, in conspiring against the Plaintiffs, did intend to attempt to eliminate the Plaintiffs' existence, in order to prevent the Plaintiffs exposing the decades-long crimes of racial discrimination against Indian physicians/healthcare providers.
3. Upon information and belief, Defendant Allstate, in approximately 1998 commenced the engineering of a policy of racial discrimination, that selectively targeted successful Indian healthcare providers for civil and criminal prosecutions for alleged healthcare fraud.
4. Since the commencement of the aforementioned policy the majority of alleged healthcare fraud cases have been against Indian healthcare providers, for many of whom English is a secondary language, and for most of whom have no familiarity with the system of English common law, from which American jurisprudence is derived.
5. Upon information and belief, Defendant Allstate used the internet to communicate with persons involved in the development of this policy of racial discrimination.
6. Defendant Allstate, in seeking to attempt to conceal its crimes of racial discrimination/judicial corruption/bribery/political corruption/fraud/kickbacks has manufactured its own Internet Service Provider, and maintains its own servers, through which it conducts the affairs of its criminal enterprise.
7. Defendant Allstate shares these servers with Defendants Christie, State of New Jersey and other persons.
8. These other persons include individuals in the Office of the New Jersey Attorney General, the New Jersey Department of Banking and Insurance, the Office of the Insurance Fraud Prosecutor, legislators/politicians within the government of the State of New Jersey, and certain members of the New Jersey Board of Medical Examiners.
9. Defendant Allstate's Indian subsidiary, Allstate India, is part of this network of servers, and since 2012, has acted as a conduit for the global propagation of the Defendants crimes. Crimes conceived, engineered and orchestrated in, and with, Defendants State of New Jersey/Christie.

10. Defendant Allstate uses Allstate India, and thus the nation of India, to launder the proceeds of its American criminal enterprise. Defendant Allstate, a corporation linked to Lloyd's of London, is attempting to exact the same injury on India, as was covertly conducted by the English East India Company in the 17th century, in which India was robbed of its mineral resources.
11. The injury in the 17th century consisted of devastating famines, while that in the 21st century consists of an excessive COVID-19 related mortality, in which India, and its people, have been robbed of their money by Defendant Allstate, money that could have been used to purchase life-saving healthcare.
12. Defendant Allstate in collusion and conspiracy with Defendant State of New Jersey has developed a series of computer servers, through which they exchange information regarding the enforcement of their policy of targeting Indian physicians/healthcare providers. The purpose of the servers/private ISP is to conceal from the public, the details of the policy and its implementation.
13. Defendant Allstate in collusion and conspiracy with Defendant State of New Jersey uses the servers to communicate information pertaining to the identification of which Indian healthcare providers will be targeted for administrative, civil and or criminal prosecution.
14. Defendant Allstate targets Indian healthcare providers for a multitude of reasons, which include, but are not limited to: **(i)** their success and relative wealth; **(ii)** the timidity of the average Indian healthcare provider and the 'shame' wrecked upon the families when the fathers/husbands/sons/mothers/wives/daughters are the subject of legal action; **(iii)** the unfamiliarity of the average Indian healthcare provider with the New Jersey legal system; **(iv)** the rapidity with which the average Indian healthcare provider will settle a case, a consequence of internal pressures that emanate from the Indian culture of non-confrontation; **(v)** the difficulty that the average Indian healthcare provider has with fluency in the English language.
15. In approximately 2008, Defendant Allstate in collusion and conspiracy with Defendant State of New Jersey, modified the application form for medical licensure to include questions regarding racial identity. No other medical board/council in the United States includes such a question on the application form.
16. Defendants Allstate/State of New Jersey as part of their policy of harassment/intimidation harassment, do widely publicize administrative/civil/criminal prosecutions, in order to publicly humiliate Indian healthcare providers and their families.

17. Defendants Allstate/State of New Jersey/Christie, as part of this policy did, and do serve subpoenas on the wives, children and friends of the targeted Indian physicians/healthcare providers, in order to intimidate, harass and ostracize them within their communities, the purpose of which was to cause the average timid Indian healthcare provider to capitulate to their claims.
18. The Defendants did and do file these fraudulent claims, claims that are weapons of racial discrimination, in courts in which they have bribed the judges. From 1998 to approximately 2008 these cases were all filed in front of Judge Villaneuva in the Morris County Court, and from 2008 to 2018, these were all filed in front of Judge Kenneth Grispin in the Union County Court. Grispin suddenly retired in July 2018, after Plaintiff Kaul filed a motion for his disqualification, a motion that was denied by his successor, Mark P. Ciarrocca, an individual against whom Kaul has filed a complaint with the Advisory Judicial Committee.
19. Defendant Allstate in collusion and conspiracy with Defendant State of New Jersey, established a series of judicial computer servers, through which corrupted state politicians would communicate to corrupted state judges, what judgements/orders were to be entered in cases filed by Defendant Allstate. In almost every case (1998 to 2019) filed in these corrupted state courts, every motion filed by Defendant Allstate has been granted, and every motion filed by the opposing parties has been denied.
20. The Defendants prolonged and pernicious policy of racial profiling and targeting Indian healthcare providers has resulted in **multiple suicides and premature deaths** of Indian physicians, healthcare providers and members of their families.
21. Defendant Allstate's prolonged and pernicious policy of racial profiling and targeting Indian physicians has deprived them of their right to a livelihood, and the right to practice their profession. These individuals have committed their lives to the practice of medicine, with on average, at least fifteen years spent in education and training.
22. Plaintiff Patel was born in India and emigrated to the United States in 1986. He holds a Masters-Degree and PhD in biochemistry.
23. Plaintiff Kaul was born in India in 1964, is a citizen of India and emigrated to the UK in 1966. Kaul underwent his medical school training at the Royal Free Hospital School of Medicine in the UK, with post-graduate training conducted in the UK and the US (CV enclosed). Kaul emigrated to the US in 1989.
24. Plaintiff Patel, in a period that commenced in 1992 developed a successful healthcare business in the State of New Jersey that provided outpatient diagnostic and surgical services to patients with degenerative and traumatic musculoskeletal and neurological conditions.

25. Plaintiff Patel's multi-facility business expanded rapidly due to the superior service provided by the clinicians and administrative staff that worked within his healthcare facilities.
26. In approximately 2008 Plaintiff Patel, because of his success and Indian ethnicity, became a target of Defendant Allstate's racial profiling policy.
27. Defendant Allstate colluded and conspired with agencies of Defendant State of New Jersey to manufacture a scheme, in which they converted Defendant State of New Jersey into a racketeering enterprise, the purpose of which was to economically annihilate Plaintiff Patel, in order to eradicate monies they owed him for the provision of diagnostic and clinical services.
28. Defendant Allstate colluded and conspired with agents/representatives of, amongst others, Liberty Mutual Insurance Company/State Farm Insurance Company, and with Defendant State of New Jersey, to develop lists of Indian physicians/healthcare providers, that they sequentially targeted with civil and criminal lawsuits in the Morris County and Union County courthouse of the New Jersey Superior Court system.
29. Upon information and belief Defendant Allstate in collusion and conspiracy with agents/representatives of, amongst others, Liberty Mutual Insurance Company + State Farm Insurance Company, established both offshore and domestic trusts and bank accounts, that belonged to corrupt state court judges and politicians. It was into these accounts, some of which are in Delaware and Nevada, that Defendant Allstate funneled bribes as part of their quid pro quo schemes, that targeted Indian physicians/healthcare providers.
30. Upon information and belief, Defendant Allstate in collusion and conspiracy with Defendant State of New Jersey, were provided with the contact information for jurors involved in cases that were filed in the Union County Court.
31. Upon information and belief Defendant Allstate, through their agents or representatives, bribed jurors in cases in which the fact finder was a jury. Upon information and belief Defendant Allstate in collusion and conspiracy with Defendant State of New Jersey engaged in Evidence Tampering, that involved the alteration of parts of the court audio recording, that undermined Defendant Allstate's cases, and supported the cases of Plaintiffs Patel, Kaul and other similarly situated Indian healthcare providers.
32. Upon information and belief, Defendant Allstate in collusion and conspiracy with the other defendants and with, amongst others, insurance companies Liberty Mutual Insurance Company and State Farm effectively used Indian physicians as 'slave labor'. This scheme consisted of permitting Plaintiffs Kaul/Patel and other similarly situated Indian healthcare providers to deliver lifesaving/pain relieving care to injured clients of

Defendant Allstate for a period of several years, during which they would withhold payment. At a certain point in time, after Kaul/Patel had treated thousands of their patients, Defendant Allstate in collusion and conspiracy with Defendant State of New Jersey, submitted false claims of insurance fraud against Kaul + Patel, in which they refused to pay for the clinical services rendered, and would then make false claims regarding monies paid, and would then demand treble damages on these false assertions. In essence, Defendant Allstate would take money from the public, purposed to pay physicians/healthcare providers, would not pay these providers and would then file false fraud claims, in an attempt to steal their property; property that had no connection to any monies that Allstate alleged it had paid. Defendant Allstate's clients were treated by Kaul/Patel, but were not paid, and were then subjected respectively to license revocation and legal harassment. This illegal scheme permitted Defendant Allstate to profit from the public's premiums at the expense of the hard-earned expertise of Kaul + Patel, expertise that took fifteen plus years to obtain. Defendant Allstate 'raped' the public and then 'raped' the Indian healthcare provider community, and have gotten away with these crimes, because of their twenty-two (22) long scheme of bribery and political/judicial corruption.

33. Following is a partial list of healthcare providers of Indian citizenship/Origin or other ethnic minorities, who have, since 1998, also been subjected to the defendants' racial profiling policies: **(i)** Sri Kantha, MD (Indian-deceased circa 2010); **(ii)** Shams Qureshi (Indian- cardiac arrest 2007); **(iii)** Gautam Seghal (Indian-PTSD); **(iv)** Manoj Patharkar (Indian-PTSD); **(v)** Terry Ramnanam (Indian-PTSD); **(v)** Dong Kwak (Korean-deceased in 2017 due to stress related cardiac arrest); **(vii)** Rodolpho Narag (Filipino-deceased in 2016 due to stress related cancer). Plaintiffs Kaul/Patel have suffered, amongst other things, immense economic damage consequent to the defendants' policy of racial discrimination, a policy that caused them to become alienated within the healthcare medico-legal-business community. Plaintiff Patel suffered economic damages as detailed in. As a consequence of the Defendants crimes and the consequent carnage caused to Kaul's economic standing/reputation, he has been illegally deprived of his liberty, worse than if he were jailed, in which instance he would receive food/lodging. Kaul has been denied public assistance in the United States and has lived in a state of abject poverty since 2014. The American federal courts have in certain cases, granted his applications to proceed in his cases In Forma Pauperis status. His applications indicate that he lives on two hundred dollars a month (\$200). The Defendants caused this damage, and the American federal courts are permitting them to continue to perpetuate this injury, in order to provide cover for their crimes.

Legal Claims

1. Violation of Article 41 of the Indian Constitution:

Article 41 of the Constitution of India “Right to work to education and to public assistance in certain cases.”

2. Violation of Article 21 of the Indian Constitution:

Article 21 of the Constitution of India “Protection of Life and Personal Liberty: No person shall be deprived of his life or personal liberty except according to procedure established by law.”

3. Violation of The Prevention of Corruption Act, 1988

The Defendants, in using the internet to transmit and have the Indian Medical Council incorporate into their database, the product of their crimes, have caused the IMC to violate the PCA (1998). This egression also constitutes a violation of United Nations Convention against Corruption (2005), that India ratified in 2005.

Relief

Monetary damages as set forth in **Exhibit 3.**

Dated: May 2, 2021

Richard Arjun Kaul, MD

Exhibit 1

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RICHARD ARJUN KAUL, MD
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UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

RICHARD ARJUN KAUL, MD

Civil Case: 3:21cv439(VLB)

Plaintiff

Complaint

v.

MICHAEL MURPHY, MD ET AL

Defendants

I, Richard Arjun Kaul, MD, the Propria Persona Plaintiff, of full age do hereby submit this Complaint on March 27, 2021 seeking the within referenced relief.

Dated: March 27, 2021



RICHARD ARJUN KAUL, MD

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Fraudulent claim by State of New Jersey/Defendants NJBME/Hafner/Kaufman and The Kaul Cases Defendant, Gregory Przybylski/Jay Howard Solomon re: Kaul lack of qualifications to perform minimally invasive spine surgery – Page 39

Fraudulent \$6 million Allstate Judgment Against Kaul + Uncontested Facts Regarding Defendants Corruption of NJ State Court System – Page 41

Defendants Global Scheme of Obstruction of Justice – Page 48

Legal Claims – Page 51

RICO 1 – Page 51

**Christie/Brown/Hafner/Murphy
Enterprise - The State of New Jersey
Defendant Persons - Christie/Brown/Hafner/Murphy
Pattern of Racketeering/RICO Predicate Acts - Mail Fraud/Wire
Fraud/Perjury/Conspiracy/Obstruction of Justice/Bribery/Kickbacks/Evidential
Tampering/Witness Tampering**

RICO 2 – Page 59

**CGLIC/AQR/Christie/Allstate
Enterprise – The State of New Jersey
Defendant Persons - Christie/CGLIC/AQR/Allstate**

**Pattern of Racketeering/RICO Predicate Acts - Mail
Fraud/Wire/Conspiracy/Obstruction of Justice/Bribery/Kickbacks**

RICO 3 – Page 64

**FSMB/CMB/Hafner
Enterprise – State of New Jersey/State of Connecticut
Defendant Persons - FSMB/CMB/Hafner
Pattern of Racketeering/RICO Predicate Acts - Mail
Fraud/Wire/Conspiracy/Obstruction of Justice/Bribery/Kickbacks**

RICO 4 – Page 67

**Kaufman/Brown/Hafner
Enterprise - State of New Jersey (Office of the AG/NJBME/OAL/State Court)
Defendant Persons - Kaufman/Brown/Hafner
Pattern of Racketeering/RICO Predicate Acts - Mail
Fraud/Wire/Conspiracy/Obstruction of Justice/Bribery/Kickbacks**

Antitrust/RICO – Page 72

**Kaufman/Christie/AQR
Enterprise - States of New Jersey-Connecticut
Defendant Persons - Kaufman/Christie/AQR
Pattern of Racketeering/RICO Predicate Acts - Mail
Fraud/Wire/Conspiracy/Obstruction of Justice/Bribery/Kickbacks**

RICO/Unjust Enrichment – Page 85

**AQR/CGLIC/Kaufman/Christie
Enterprise - State of New Jersey (Office of the AG/NJBME/OAL/State
Court/United States Bankruptcy Court-DNJ)
Defendant Persons - Kaufman/Christie/AQR/CGLIC
Pattern of Racketeering/RICO Predicate Acts - Mail
Fraud/Wire/Conspiracy/Obstruction of Justice/Bribery/Kickbacks**

Relief – Page 93

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: Docket Number Pending

P1 – Kaul/Patel v Crist: 19-CV-08946

P2 – Kaul/Patel v Allstate: 19-CV-09232

Parties

1. Plaintiff Richard Arjun Kaul, MD ("**Kaul**"): 440c Somerset Drive, Pearl River, NY 10965. Application for medical license granted by the State of Pennsylvania on May 28, 2020. Order adopted by **The Kaul Cases** Defendant, Pennsylvania Medical Board on February 8, 2021, after Kaul filed a petition for a writ of mandamus in the Supreme Court of Pennsylvania (December 2, 2020) and named Defendant PMB in K11-1 (January 12, 2021). Kaul is a recognized pioneer in Minimally Invasive Spine Surgery, having revolutionized the specialty in 2005, when he performed the first outpatient minimally invasive spinal fusion/in 2011 the first outpatient adolescent spondylolisthesis correction/in 2012 the first four-level outpatient spinal reconstruction:

https://www.youtube.com/watch?v=q_HBzqfggrq

<https://www.youtube.com/watch?v=oxaV5lJuZ7c&t=6s>

<https://www.youtube.com/watch?v=JX4bnRPPucl&t=44s>

<https://www.youtube.com/watch?v=9NjJV7XhBB0&t=57s>

And then in 2008 Kaul established The Spine Africa Project:

<https://www.youtube.com/watch?v=Zu50ik2l2Sc&t=17s>

Kaul CV (**EXHIBIT 1-KAUL:0002**).

1. Defendant Christopher J. Christie, Esq ("**Christie**"): 47 Corey lane, Mendham, Nj 07945. Ex-NJ Governor (2009 to 2017). Lost 2016 bid to President Trump for Republican nomination for Presidency of the United States. As NJ Governor abused power to 'weaponize' Defendant NJBME/state AG/state courts/federal AG/NJ federal court to eliminate (suspend/revoke medical licenses)/incarcerate physicians whose medical practices threatened/undermined the political/economic agendas of physicians/hospitals/insurance companies from whom he/his associates (law firms/political lobbyists/public relation firms) received bribes (disguised as 'legal fees', 'public relation fees' and or 'political lobbying fees'.). The entire mechanism (Defendant NJBME/State AG/NJ OAL) is controlled by the executive branch of state government, over which Defendant Christie abused absolute power.

<https://www.youtube.com/watch?v=34Gdu-TINEM>

2. Defendant New Jersey Board of Medical Examiners ("**NJBME**"): 140 E Front Street, Trenton, NJ 08608. Defendant NJBME is a purported state agency whose members are political appointees that serve at the pleasure of the Governor. The New Jersey Office of the Attorney General simultaneously prosecutes cases against physicians, while providing internal counsel to Defendant NJBME. The New Jersey

Attorney General is appointed by the Governor. Defendant CMB claims to “**protect the public**”, a false claim for which there exists no evidence.

3. Defendant Connecticut Medical Board (“**CMB**”): 410 Capitol Ave., MS #13PHO, Hartford, CT 06134. Defendant CMB is a purported state agency, whose members use the board’s power to engage with for-profit healthcare corporations in the business of medicine. Defendant CMB is a member of the “**FSMB-SMB One Unit Cartel**” (“**FC**”) comprised of The Kaul Cases Defendant, Federation of State Medical Boards (“**FSMB**”)/State Medical Boards (“**SMB**”). It is an illegal association-in-fact entity that profits from the billion-dollar industry of so-called physician credentialing/regulation. Defendants CMB/FSMB and the “**FSMB-SMB One Unit Cartel**” operate in violation of the due process clauses of state/federal constitutions/antitrust law/Commerce Clause. Defendant CMB claims to “**protect the public**”, a false claim for which there exists no evidence.

4. Defendant AQR Capital (“**AQR**”): Two Greenwich Plaza, Greenwich, CT 06830. Defendant AQR is a hedge fund that is one of the top ten corporate shareholders in Defendant Allstate. The top ten hold approximately eighty percent (80%) of stock. Defendant AQR, a knowing co-conspirator in the crimes of Defendant Allstate, did illegally and unjustly enrich itself/its clients at the expense of Kaul, while laundering criminal proceeds through the New York Stock Exchange. It is a resident of the State of Connecticut.

5. Defendant Federation of State Medical Boards (“**FSMB**”): 400 Fuller Wiser Rd, Suite 300, Euless, TX 76039. Defendant FSMB is a for-profit corporation that operates with state medical boards in the business of so-called physician regulation/credentialing. It, and its members, profit from advancing the economic/political agendas of both privately held and publicly traded corporations that operate in the trillion-dollar healthcare market. Defendant FSMB controls state medical boards, to whom it dictates economically driven physician disciplinary policy. For example, it encourages state medical boards to suspend/revoke the licenses of physicians who dispense non-pharmacological alternative therapies, as this undercuts pharmaceutical corporation profits. Defendant FSMB is anti-innovation unless the innovation generates profit for them and the corporations that bribe them.

6. Defendant Doreen Annette Hafner, Esq (“**Hafner**”): 49 Seminole Drive, Ringwood, NJ 07456. Defendant Hafner is a deputy Attorney General in the Office of the New Jersey Attorney General. Defendant Hafner began illegally conspiring with Defendant Kaufman and others, in or around 2009, to have Kaul’s license revoked, a scheme she knew was illegal. Defendant Hafner knew she was participating in a scheme of public corruption and caused subornation of perjury with six (6) of Kaul’s patients, whom she had lie under oath (April 9 to June 28, 2013-NJ OAL Hearing), by falsely stating that their back/leg pain worsened after the care they received from Kaul. The evidence of the patients’ clinical notes proves that these six (6) patients improved after the care, but Kaul’s lawyer failed to include this evidence in his case (it would likely have made no difference as The Kaul Cases Defendant, Solomon-NJ OAL Judge had

been corrupted by Defendant Allstate/Geico). Further evidence of both Defendant Hafner's abusive/corrupted/illegal state-of-mind and the abusiveness of the illegal system of physician regulation is found in a letter transmitted by Defendant Hafner to Defendant NJBME using the US mail/wires, in which she re-publishes verbiage Kaul's then lawyer, Michael Keating, instructed him to include in his 2014/2015 application for reinstatement of his NJ license. In Defendant Hafner's letter (March 3, 2015), with knowledge that the suspension/revocation of Kaul's license was illegal, Defendant Hafner, instead of reporting the crime to state/federal investigative/prosecutorial authorities, perpetuated the crime by using the US mail wires to further propagate the falsehoods that Kaul was not qualified to perform minimally invasive spine surgery and had injured patients. Defendant Hafner knew these were lies, but even into 2015 continued to commit a fraud against Kaul, the public and the United States.

7. Defendant Abbott Brown, Esq ("**Brown**"): Lomurro Law, 4 Paragon Way, Suite 100, Freehold, NJ 07728. Defendant Brown is a NJ based personal injury/medical malpractice lawyer who was, in 2012, a partner at the law firm of Bendit Weinstock, when he, in collusion/conspiracy with Defendant Hafner recruited Kaul's patients, through fraudulent schemes that involved Defendant Hafner illegally providing him with patients contact information, that she had illegally obtained from Kaul's surgical center and various insurance companies. Defendants Brown/Hafner collaborated in this "**Christie Insurance Fraud Scheme**", in which they conspired with Kaul's patients/his physician competitors (Alfred Steinberger-neurosurgeon/Arash Emami-orthopedic spine surgeon/George Naseef-Orthopedic Spine Surgeon/Kenneth Rieger-Orthopedic Spine Surgeon) to file knowingly fraudulent malpractice claims that defrauded Kaul's medical malpractice carriers of millions of dollars. Defendant Brown provided a percentage of these monies as 'kickbacks' to Defendant Christie, and disguised other bribes as so called 'political campaign' donations, in order to ensure Defendant Christie continued to abuse his authority to have state court judges enter multi-million-dollar judgments against Kaul/his malpractice carrier. In 2013, Defendant Brown became a partner at the law firm of Lomurro/Schottland et al.

8. Defendant Connecticut General Life Insurance Company ("**CGLIC**"): 900 Cottage Grove Rd, Bloomfield, Connecticut 06002. Defendant CGLIC is an insurance subsidiary of Cigna Healthcare and a resident of the State of Connecticut. It, as with Defendants Allstate/AQR, bribed Defendant Christie, through the transfer of shares/stocks/dividends and other monies, as part of a series of quid pro quo schemes purposed to have him abuse the executive power of the Office of the NJ Governor to have Kaul's license revoked in order to eradicate their past debt to Kaul and eliminate any future liability.

9. Defendant Andrew Gregory Kaufman, MD ("**Kaufman**"): 16 Sierra Court, Hillsdale, NJ 07642. Defendant Kaufman is an individual with a business located at 90 Bergen Street #3400, Newark, New Jersey 07103. Defendant Kaufman was paid by the State of New Jersey to provide testimony against Kaul. Defendant Kaufman was a market competitor of Kaul and engaged in healthcare business with The Kaul Cases Defendants Robert Heary, MD/Gregory Przybylski, MD/Atlantic Health System. Defendant Kaufman committed perjury in the case/hearing (April 9 to June 28, 2013)

that resulted in the illegal revocation of Kaul's license. Defendant Kaufman verbally abused, publicly humiliated and provided willfully negligent care to a number of patients that had received care from Kaul. Many of these individuals sustained permanent neurological injuries consequent to Defendant Kaufman's gross negligence. Defendant Kaufman receives bribes from Defendants Allstate/Geico to provide false testimony that has results in the wrongful incarceration of physicians to whom Defendants Allstate/Geico owe monies. Defendants Kaufman/Hafner/Allstate/Geico, through this scheme of abuse/corruption of the judicial process, have, in the period commencing in 2000, caused the incarceration of innocent physicians/destruction of professional careers/physician suicides/destruction of physicians' families in their pursuit of executive/corporate//professional profit and advancement.

<https://www.drrichardkaul.com/so/e1NRN-ovB?languageTag=en>

10. Defendant Michael Murphy, MD ("Murphy"): 6 Woodland Road, #3B Madison, CT 06443. Defendant Murphy is an orthopedic surgeon who conducts healthcare business with Yale New Haven Health System in the State of Connecticut. Murphy has no education/training/qualifications/experience in minimally invasive spine surgery, but yet was permitted by corrupted NJ state court judges to provide testimony as an 'expert' witness against Kaul in fraudulent cases filed by Defendant Brown/others in a period that commenced almost immediately after the widely publicized, and illegal, suspension (April 2, 2021) of Kaul's NJ license. Defendant Murphy's committed perjury with regards to the issue of a standard of care for minimally invasive spine surgery, and this perjury caused the embezzlement of millions of dollars from Kaul's medical malpractice carriers. Defendant Murphy, as with The Kaul Cases Defendant, Gregory Przybylski, MD, knew there was no standard, and knew that Kaul's care had not deviated from any standard of medical care, but nonetheless committed the RICO predicate acts of perjury/fraud to aid and abet The Kaul Cases Defendants schemes and "**pattern of racketeering**" purposed to destroy Kaul's economic standing/his livelihood/his reputation/his life and that of his children.

11. Defendant Allstate Insurance Company ("ALL"): Attention Thomas Wilson: 2775 Sanders Road, Northbrook, IL 60062. Defendant Allstate is a publicly traded corporation that sells insurance products. It maximizes corporate/executive/shareholder profit through schemes of political/judicial/legislative corruption that permit it to arbitrarily raise the public's insurance premiums, while reducing the percentage paid to healthcare providers. Defendant ALL, through its schemes of political/judicial/legislative corruption eliminates healthcare providers and debts owed to these individuals, through the filing of knowingly false administrative/civil/criminal complaints, in administrative/state/bankruptcy/federal courts whose judges they have bribed or otherwise corrupted.

Jurisdiction + Venue

12. General Jurisdiction: U.S.C. § 1331 because Kaul'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. Section 1337 because this action alleges violations of an Act of Congress regulating commerce por protecting trade and commerce against restraints and monopolies. And 15 U.S.C. Section 4 and 16 confer subject matter jurisdiction on this Court over claims brought under the Sherman Act. This Court also has subject matter jurisdiction over this action pursuant to 28 U.S.C. section 1332(d)(2)(A)(5) because Kaul is a citizen of a different state to certain Defendants and the aggregate amount in controversy exceeds seventy-thousand dollars.

13. Personal Jurisdiction: This Court has personal jurisdiction over each Defendant, as 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 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. 4(k)(1)(A) because they would be subject to the jurisdiction of a court of general jurisdiction in Connecticut.

14. This district has jurisdiction over this case, as Kaul has sustained a **“new racketeering injury”** in being foreclosed from obtaining a license to practice medicine and surgery in this district consequent to the illegal suspension/revocation (2012/2014) of his New Jersey license, one of many permanent injuries caused to Kaul consequent to the Defendants' ongoing **“open-ended pattern of racketeering”** being conducted through the enterprise of the United States by the **“FSMB-SMB One Unit Cartel”** (see below for full description) in collusion/conspiracy with **The Kaul Cases** Defendants.

15. In addition, this district has authority/jurisdiction over this case, as the court/judges in the District of New Jersey are Defendants in K11-1 and K11-3, as well as having been reported to state/federal investigatory/prosecutorial authorities.

Preliminary Statement

16. This case represents the commencement of a narrowing of the issues raised in the previous filings of **The Kaul Cases** but continues the theme of corruption at the intersection of the worlds of medicine/business/law/politics, with a focus on corruption of New Jersey state court judges by the Defendants. The case covers a period from 2005 to 2021, that witnessed how what began with petty professional jealousy/greed/arrogance, escalated into schemes of judicial corruption that polluted administrative/state/bankruptcy/federal courts within the geographic boundaries of the State of New Jersey. The case details how the Defendants funneled the polluted judgments procured in these corrupted courts into the politico-legal apparatus of the United States, in knowing violation of criminal law, but with the intent of providing cover for their crimes, while committing a massive 'Fraud on the Court' against the United States. The Defendants, in the commission of their crimes, co-opted the legislative/executive/judicial branches of the State of New Jersey, in order to execute their knowingly illegal scheme and provide them with legal cover, in an attempt to avoid civil/criminal prosecution.

17. Central to the Defendants scheme was the flow/exchange of information/money between politicians/judges/physicians/hospital-insurance executives, purposed to eliminate Kaul and the economic debt/threat he posed to the Defendants and their co-conspirators. The Defendants, in seeking to justify their crimes to the public, propagated and prosecuted a massive series of lies, that Kaul was not qualified to perform minimally invasive spine surgery, had committed insurance fraud and was to be indicted by the United States Government, the purpose of which was to isolate Kaul economically/socially/professionally, to force him into a state of poverty and to prevent him from ever gaining any form of type of employment anywhere in the world. The various endpoints of the Defendants scheme included having Kaul jailed/deported/killed.

18. The Defendants, in perpetrating their crimes, did not limit their ends to eliminating Kaul and his children, but defrauded, in collusion/conspiracy with the State of New Jersey, his medical malpractice carrier of tens of millions of dollars in fraudulent judgments issued by corrupted NJ state court judges in medical malpractice/insurance fraud suits. The Defendant lawyers in these cases kicked back a percentage of the monies to Defendant Christie, as part of a series of quid pro quo schemes, in which Defendant Christie abused the power of public office to order judges/medical board members to revoke Kaul's license and enter judgments against him, acts that the Defendants knew were illegal.

19. This case lends further weight to the advancing point of **The Kaul Cases** and brings closer its central purpose, which is that of a "**Reformation of American Medical Boards**", a much overdue change, the urgency of which has been exposed by the western world's highest COVID-19 related morbidity/mortality. This fact is accounted for by the rampant corruption of the three branches of state/federal governments by for-profit healthcare corporations. Political corruption kills.

State medical board members - A question of mental instability, dubious character and lethal tactics:

20. The Kaul Cases Defendants, Steven Lomazow, MD, a NJ neurologist who occupied a senior/controlling position on Defendant NJBME from 2006 to 2014, admitted to having knowledge about the untimely death in November 2006 of NJ Deputy Attorney General, Paul Kenny:

https://www.nj.com/news/2011/11/years_after_her_husband_lost_h.html

21. Kenny was about to expose the grand schemes of corruption by the insurance/hospital industry of the legislative/executive branches of the State of New Jersey. He was murdered.

22. In the below video, **The Kaul Cases** Defendant, Lomazow, identifies physician, Kenneth Zahl, as having been involved. From 2002 to 2006 Kenny prosecuted Zahl, who allegedly bribed multiple NJ politicians/judges to have Kenny removed from the case:

<https://www.youtube.com/watch?v=sFtE8EvEMsU&t=20s>

23. Lomazow conducted healthcare business with many of **The Kaul Cases** Defendants, from many of whom he received bribes to have suspended/revoked Kaul's license (April 2, 2012/March 24, 2014), a scheme he knew was illegal.

24. Lomazow's criminal insanity is a ubiquitous state-of-mind, responsible for **The Kaul Cases** Defendants decades-long scheme of crimes against humanity, committed with impunity, but punishable under state/federal/international law.

Evidence

25. The contextual/conclusive evidence submitted in support of the claims in conjunction with the Defendants defenselessness, renders this Complaint equivalent to a motion for Summary Judgment. Since the commencement of **The Kaul Cases** Defendants have failed to contest/rebut/refute/address the evidence of their crimes, and have raised, as their only defense, their illegal suspension/revocation (April 2, 2012/March 24, 2014) of Kaul's license. The evidence contained within '**The Solomon Critique**' and '**The Solomon Critique 2**' dismantled this defense, as the evidence is the Defendants' evidence, which irrefutably/unequivocally/admittedly proves that the suspension/revocation, and the surrounding administrative proceedings, were/are illegal and were conducted illegally. The Defendants, in collusion/conspiracy with the State of New Jersey, perpetrated a massive crime on Kaul, the public and the United States, and have continued to use the knowingly illegal proceeds of that crime in their defense against Kaul's claims. The Defendants calculated that if they were able to restrict Kaul's prosecution to courts within the geographic boundaries of the State of New Jersey, the claims would be either stayed/dismissed or otherwise foreclosed from prosecution, as the Defendants had bribed/corrupted the judges in these courts. In K5, it took **The Kaul Cases** Defendants fourteen (14) months to corrupt the judicial process, and have the case transferred from the DC court to Defendant DNJ-Newark (December 12, 2020). K5 was docketed in DNJ-Camden, where an order re: discovery conference (D.E. 155) was immediately entered. **The Kaul Cases** Defendants immediately filed a motion in front of Defendant/Chief Judge Freda Wolfson, to have the case transferred to Defendant/U.S.D.J. Vazquez in Defendant DNJ-Newark, a transfer that was granted and rapidly followed by an order to stay the case. Kaul subsequently filed K11-1/K11-3/K11-2 and now K11-4. On March 3, 2021, **The Kaul Cases** Defendants, Allstate/Geico filed a motion in K1 (closed/on appeal in the U.S.C.A. for the Third Circuit), that seeks to have Defendant/U.S.D.J. Vazquez enter an order that violates the jurisdictional rights of every other district court in the United States, and on March 17, 2021, Kaul served on SCOTUS a notice establishing that all/any orders from Defendant DNJ-Newark (February 22, 2016-Infinity) are null/void.

CONTEXTUAL EVIDENCE:

26. June 29, 1998 – London Independent: Doctor to challenge medical hierarchy (Exhibit 2 – KAUL:0011):

“A CONSULTANT anesthetist from America who has moved to Britain is to challenge the “closed shop” run by the medical colleges which have refused him consultant status in the United Kingdom.”

27. November 2008 – An Unholy Alliance: Perceptions of Influence in Insurance Fraud Prosecutions and the Need for Real Safeguards – Aviva Abramovsky (Exhibit 3 - KAUL:0015):

Expert evidence in support of Kaul's claims that the Defendants converted the legislative/executive/judicial branches of the State of New Jersey into **"racketeering enterprises"** through which they conducted a **"pattern of racketeering"**. The Defendants illegal **"pattern"** is replicated throughout the United States and has injured hundreds of thousands of physicians/patients.

28. April to June 2012 – Letters of support/recommendation from Kaul's patients/physicians to Defendant Christie to have Defendant NJBME reinstate Kaul's license (Exhibit 4 – KAUL:0019):

"I realize that Dr. Kaul does not have the same type training that most of us have, having been trained partially here, partially in England, and partially in Korea, but he has a good grasp of principles and techniques. His outcomes are rather good." – Letter from Dr. Richard Jordan (board certified neurosurgeon) to Dr. Paul Jordan (2012 President of Defendant NJBME).

"I have recommended Dr. Kaul to the highest degree to everyone that I know and cannot give him enough credit for taking on a task that no other doctor would even consider. I was told nothing could be done for me that I would end up in a wheelchair with the deterioration of my spine. He promised me relief and to this day I owe him my every movement, happiness and pain-free days of my life. He is not only an incredible doctor but cares very deeply and sincerely for the well-being of his patients. It sickens me to know that a man of his knowledge, expertise, background and fortitude has to endure such a horrendous outcome at this point in his career. I still continue to be under Dr. Kaul's care out of his concern to monitor my health and progress. Please consider all the good that this man has done for scores of people throughout the world that he has helped during his career and reinstate him back to full duty as soon as possible. Dr. Kaul is my savior and my salvation, I owe him my life and the quality of it that I enjoy daily" – Patient Jean Sandfort

29. September 17, 2009 – Letter from Cheryl Schwartz to Defendant NJBME (Exhibit 5 – KAUL:0021):

"AFTER DR. KAUL DID HER SURGERY, MS. KUREN CLAIMED TO BE OUT OF PAIN BUT JUST SORE FROM THE SURGERY. SHE WAS WALKING PERFECTLY STARIGHT BUT STILL WITH A CANE. APPROX I LATER SHE HAD CALLED ME AND TOLD ME SHE HAD TRIPPED OVER, IT WAS EITHER HER CAT OR HER CANE, AND FALLEN INTO HER FISH TANK WHICH WAS APPROX. 4 FT AWAY FROM HER AND THEN LANDED ON THE FLOOR WITH THE TANK ON TOP OF HER. SINCE THAT TIME MS. KUREN HAS TOLD ME THAT SHE HAS BEEN BACK IN PAIN AND BACK TO LEANING TO THE SIDE AGAIN. SHE ALSO SAID SHE WOULD SUE DR. KAUL, BUT FOR SOMETHING HE DIDN'T DO. SHE DID THIS HERSELF AND SHE IS TO BLAME NOT HIM. I THINK THIS IS INSANITY."

30. August 17, 2010 – Operative report for Marietta Ernst (Exhibit 6 – KAUL:0023):
"The patient was discharged in a stable neurological and cardiovascular state."

31. July 5, 2011 – Follow-up consultation for Marietta Ernst (Exhibit 7 – KAUL:0028):

“The patient comes back today stating that there has continued to be an excellent improvement of symptoms in her lower back and leg subsequent to the L3-4 interbody fusion ...”

32. April 27, 2014 – Lou Manzo’s book about Chris Christie’s abuse of the justice system for political gain (Exhibit 7 – KAUL:0031):

“He said the book tries to make the case that Bid Rig III, serving as a political tool to get Christie elected, often allegedly violated the very principles of justice that Christie and others in the US Attorney’s Office took oaths to uphold.”

33. March 3, 2015 – Letter from Defendant Hafner to Defendant NJBME re: Kaul’s application for reinstatement NJ license (Exhibit 8 – KAUL:0033):

Further evidence of both Defendant Hafner’s abusive/corrupted/illegal state-of-mind and the abusiveness of the illegal system of physician regulation is found in a letter transmitted by Defendant Hafner to Defendant NJBME using the US mail/wires, in which she re-publishes verbiage Kaul’s then lawyer, Michael Keating, instructed him to include in his 2014/2015 application for reinstatement of his NJ license. In Defendant Hafner’s letter (March 3, 2015), with knowledge that the suspension/revocation of Kaul’s license was illegal, Defendant Hafner, instead of reporting the crime to state/federal investigative/prosecutorial authorities, perpetuated the crime by using the US mail wires to further propagate the falsehoods that Kaul was not qualified to perform minimally invasive spine surgery and had injured patients. Defendant Hafner knew these were lies, but even into 2015 continued to commit a fraud against Kaul, the public and the United States:

“In that letter Respondent boldly told the Board that he would not be in attendance at the February 12th hearing because the Board was “unconstitutional” and had “illegally suspended his medical license.”

In due course, Defendant Hafner will be provided the opportunity to explain to a jury why she should not go to jail for so **“boldly”**, persistently and with such **“flagrant”** disregard for the law, abuse the power of public office to perpetuate the crimes of **The Kaul** Cases Defendants. Maybe a lengthy period of incarceration will remind her that no one is above the law, not even a morally corrupt NJ deputy attorney general. Defendant Hafner has committed many crimes against many innocent physicians for many years and destroyed the lives of many of these physicians and their innocent families. She will pay.

34. October 11, 2015 – FTC v North Carolina Dental Board Guidelines re: conditions for medical board immunity (Exhibit 9 – KAUL:0038):

“The following do not constitute active supervision of a state regulatory board that is controlled by active market participants ... The state attorney general or another state official provides advice to the regulatory board on an ongoing basis.”

Defendant NJBME remains in violation of the law, six (6) years after SCOTUS created this law.

35. July 12, 2017 – Affidavit of Kenneth Sabo re: Kaul (Exhibit 10 – KAUL:0053):

“I often heard other patients express high opinions of Dr. Kaul. Both his patients and his staff expressed immense respect for his abilities, and this was evident to me from the professional, yet friendly environment that I experienced while under the care of Dr. Kaul.”

Defendant Hafner attempted on multiple occasions to manipulate Sabo into testifying against Kaul, despite the fact she knew he had improved after the surgery. Defendant Hafner attempted the same devious scheme on many of Kaul's patients, including Amanda Mrsaz, the seventeen-year-old gymnast who was interviewed with Kaul in August 2011 for NJ Channel 12 news with Dr. Derek DaSilva. This channel continues to ignore Kaul's requests for an apology for running non-stop slanderous media in the period after the April 2, 2012 suspension.

36. August 6, 2017 – Affidavit of John Zerbini re: Kaul (Exhibit 11 – KAUL:0057):

“Hafner stated that Dr. Kaul had committed Medicaid and Medicare fraud, and asked me what insurance company had paid him for the procedure he performed on me. I told her that I had no insurance, and that Dr. Kaul had provided his services and that of his facility for free ... I believe that Hafner went into great detail about a case in London that occurred in 1999 ... told me that Dr. Kaul fled the country before the authorities had completed their investigation and had been a fugitive.”

Defendant Hafner's continued employment by the State of New Jersey is consistent with its knowing/willing/culpable participation in the commission of the massive crimes of **The Kaul Cases** Defendants. Kaul, will in due course, take ownership of its assets.

37. May 20, 2018 – Letter from Kaul to Defendant/U.S.D.C.-Newark re: Defendant Przybylski (Exhibit 12 – KAUL:0066):

“The Board of Directors also concluded that Dr. Przybylski violated Section A.4 by misrepresenting the standard of care when he testified that antibiotic treatment ...”

The Kaul Cases Defendant Przybylski testified that every aspect of the care Kaul delivered to his patients constituted a “**gross deviation**” from the standard of care. Ninety percent (90%) of his practice is devoted to making money from testifying against other physicians and medical politics. The remainder (10%) is spent in clinical care.

38. June 18, 2018 – Letter from Kaul to Defendant Murphy (Exhibit 13 – KAUL:0075):

“On May 24, 2018 I filed a complaint against Przybylski with the Wisconsin Medical Board that included a copy of the aforementioned disciplinary notice (Exhibit 10). Przybylski admitted under cross-examination on May 6, 2013 that there are no specific standards that pertain to the performance of lumbar fusions. This contradicted his prior written and oral testimony, which he provided under oath with knowing falsity. It has therefore been established that there are no commonly accepted standards for the performance of lumbar fusions, and thus your report that my care deviated from such a standard is contradicted by legal precedent. You might not have known this fact when you agreed to provide an opinion against me, but you do now, and if you chose to ignore this fact, then I will ensure your misconduct comes to the attention of the American Association of Orthopedic Surgeons, the Yale New Haven Medical Center and the Connecticut Medical Board.

I hope, Dr. Murphy, that as a member of the medical profession you understand the serious consequences of your actions in court, and particularly those that involve the provision of testimony under oath. This case is frivolous and is a direct consequence of the professional jealousy and political corruption that caused the illegal revocation of my license. Kaul v Christie is a case with conclusive evidence, that I firmly believe will be successful, and once the claims have been proved I will move to have undone all of the frivolous malpractice lawsuits that were decided against me. I will also move to have disciplinary proceedings instituted against the 'experts' involved in these cases, of which you were one. I hope you give this letter the serious consideration it deserves, and thoughtfully weigh the professional exposure to which you will be subjected, should you decide to testify.”

39. June 27, 2018 – Letter from Kaul to Marna Borgstrom, CEO Yale New Haven Health System (Exhibit 13 – KAUL:0079):

“Murphy's written and pre-trial oral testimony was provided both in the context of his professional association with the Yale New Haven Health System, and while he was physically on the premises of the hospital. Murphy used this association to bolster his fraudulent testimony and manufacture a clinical standard that he knew was false, and it was from this false standard that he claimed my care had deviated. Murphy's dishonest testimony, under the doctrine of Respondent

Superior and general theories of various liability, has caused the Yale New Haven Health System to become liable for his unlawful conduct, and the damage it caused to my economic and professional standing.”

40. June 30, 2018 – Case Numbers: Allstate v Kaul (AM-000723-16T4) + Kaul v Kaul (A-2201-16T1) + Park v Kaul (A-004575-16T3): Letter from Kaul to NJ Chief Justice Stuart Rabner

“Dear Chief Justice Rabner,

I write this letter in furtherance of my request, detailed in a letter dated April 27, 2018 (copy enclosed), that New Jersey Administrative Law Judge, Jay Howard Solomon and New Jersey physicians, Gregory Przybylski, MD and Andrew Kaufman, MD, be referred to the Department of Justice and the Office of the New Jersey Attorney General, for having collectively committed two hundred and seventy-eight (278) separate instances of perjury and evidential omissions, misrepresentations and gross mischaracterizations. These individuals committed these offenses in a state administrative proceeding that commenced on April 9, 2013, concluded on December 13, 2013 and resulted in the illegal revocation of my New Jersey medical license. A letter was sent to each of the seven (7) Justices of the New Jersey Supreme Court (copies enclosed).

On or about May 13, 2018, I received a letter, dated May 11, 2018, from the Clerk, with the subject title, 'Re: Letter to Justice LaVecchia dated April 27, 2018' (copy enclosed). The unsigned letter informed me that no action would be taken, unless and until the New Jersey Appellate Court entered an order or judgment in a case that involved me. This condition has now been met in three (3) cases:”

The NJ Court failed to refer the matter for investigation to either state/federal authorities, as the Court had conspired with the State of New Jersey against Kaul, in aiding/abetting its conversion into a “racketeering enterprise” by The Kaul Cases Defendants in collusion/conspiracy with the executive branch of the State.

41. August 11, 2018 – Case Number: 19-49-007483 – IN THE MATTER OF THE APPLICATION FOR LICENSE TO PRACTICE AS A MEDICAL PHYSICIAN AND SURGEON OF RICHARD ARJUN KAUL, MD (IN PENNSYLVANIA): Letter from Kaul to PA Governor, Thomas Wolf:

“This letter stems from an application for medical licensure that I submitted on September 22, 2017 to the Pennsylvania Medical Board (“PMB”). The PMB allowed itself in approximately March 2018, to become entangled in a racketeering conspiracy and scheme that commenced in approximately 2008 in New Jersey that involves, amongst others, the New Jersey Board of Medical Examiners (“NJBME”) and ex-Governor, Christopher J. Christie. The facts and circumstances of these schemes are detailed in two lawsuits that I filed in the

United States District Court: (i) Kaul v Christie, et al: 16-CV-02364; (ii) Kaul v Christie et al: 18-CV-08086

On July 24, 2018, the PMB denied my application for licensure, notwithstanding the fact that it I had provided overwhelming evidence that state actors and agencies, involved in the revocation of my license, had engaged in an eight-year (8) campaign of Racketeering, Perjury, Obstruction of Justice and Evidence Tampering (Appendix 5).”

Kaul submitted an overwhelming amount of evidence to K11-1 Defendant PMB regarding the crimes of The Kaul Cases Defendants, but Defendants Allstate/Hafner/Christie/Kaufman continued their “**pattern of racketeering**” into the State of Pennsylvania, by converting Defendant PMB into a “**racketeering enterprise**” through which it committed the RICO predicate acts of mail fraud/wire/fraud/conspiracy/obstruction of justice/coercion, the latter being exacted by it and the “**FC**” threatening Defendant PMB that its legitimate orders would be ignored in other American states. Defendant NJBME and “**FC**” knew its threat constituted/constitutes a violation of the Commerce Clause and usurped/usurps federal authority. Defendant NJBME/Hafner and “**FC**” are continuing to commit this crime across the United States against thousands of physicians, in order to expand their control/power of the business of so-called physician regulation/certification, in order to generate further billions in profit and further subjugate/control the physician workforce to serve for-profit healthcare corporations, such as The Kaul Cases Defendants Allstate/Geico and the corporations that invest in them.

42. August 12, 2018 – Case Numbers: Allstate v Casatelli (UNN-L-1762-12) + Allstate v Kaul (UNN-L-322-15) + Santos v Kaul (UNN-L-3322-15): Letter from Kaul to NJ State Court Judge, Mark P. Ciarrocca:

“Dear Judge Ciarrocca

I write this letter to bring to the Court' attention two issues that have come to my attention within the last twenty-four (24) hours, that I believe will effect the judicial administration of the above matters. These issues support an argument that I have been advancing since June 2012, that the administrative and state judicial apparatus in New Jersey is corrupt and has engaged against me, in a six (6) year campaign of Obstruction of Justice and Evidence Tampering. This argument is the reason I sought the United States District Court, Southern District of New York as the venue for Kaul v Christie (16-CV-02364-Filed February 22, 2016), and is the reason I am moving in the Second Circuit Federal Court of Appeals, to have Kaul v Christie (18-CV-08086- Filed April 9, 2018) remain in the Southern District of New York.”

“On August 11, 2018 I discovered that the audio file had been truncated, and that it stopped at a point just before the commencement of argument regarding

Allstate’s motion for default judgment, this being the segment in which I raised the issue of political corruption in the Christie administration.”

The state court judge failed to refer the crimes of **The Kaul Cases** Defendants to investigative/prosecutorial authorities, as he was aiding/abetting the crimes by attempting to provide cover through tampering with court recordings, that contained evidence that incriminated Defendant Christie. The judge was appointed to the bench by Defendant Christie.

43. September 20, 2018 – Case No. Kaul v Stolz: 18-CV-01489:

“This case is a massive Fraud on the Court, in which the trustee, Daniel Stolz and his co-conspirators (Mark Manlgan, Esq + Henry Bloom + Eric Katz, Esq + Sean Callagy, Esq + Darry Neier, CPA + Atkins + William Speed) converted the United States Bankruptcy Court into a racketeering enterprise, that through the commission of the predicate acts of bribery + fraud + extortion + embezzlement + kickbacks + mail fraud + wire fraud, advanced their criminal scheme to defraud the estate+ creditors of \$45 million owed in accounts receivable.

Wasserman received a letter from Kaul, dated December 15, 2015, in which Kaul warned him that if evidence emerged that he had engaged in criminal conduct, then Kaul would have him held criminally liable. He died eight (8) weeks later. During this case two of the doctors that worked for Kaul died. Korean anesthesiologist, Dong Kwak died in late 2017, after suffering several heart attacks and strokes consequent to the stress associated with ...”

The Kaul Cases Defendants continued their “**pattern of racketeering**” into the United States Bankruptcy Court for the District of New Jersey, through the commission of the RICO predicate acts of trustee/judicial bribery and mail/wire fraud and obstruction of justice. This court, as with every other court within the geographic boundaries of the State of New Jersey was converted into a massive “**racketeering enterprise**”, from which illegal judgments were rendered (June 17, 2013 to July 30, 2020), which were then entered on the court record of all courts within not just the United States, but the world. **The Kaul Cases** Defendants have committed a ‘Fraud on the World Court’ and are thus liable in international courts.

44. September 21, 2018 – Case Numbers: Kaul v Christie (16-CV-02364 – K1) + Kaul v Christie (18-CV-08086 – K2): Affidavit of Dr. Arnold Erwin Feldman (Exhibit 13 – KAUL:0081):

“There is a doctor in New Jersey, Richard Kaul, who is performing fusions, but they are going to get him.”

The Kaul Cases Defendants commenced conspiring against Kaul in 2005, after he had performed the first ever outpatient minimally invasive spine fusion, using a percutaneous technique he invented, as demonstrated in the above video. Their

motivation, other than greed, was pure arrogance and a belief that their crimes would not be exposed, and even if Kaul initiated legal action, they had corrupted/controlled the judges within administrative/state/bankruptcy/federal courts within the geographic boundaries of the State of New Jersey, and his cases would be quashed out of the public eye. They also believed that Kaul would never have his story told, as the media had been corrupted/controlled, and that he would be rapidly bankrupted and just, as stated in April 2021 by the Office of the NJ AG, **“pack his bags and leave”**. No license, no money, no friends, no livelihood, no place to live, no place to sleep, no car, no food, no possessions and a reputation forever destroyed. **The Kaul Cases** Defendants stole everything, except Kaul's determination and doggedness to bring these individuals to justice, not just for himself, but for every human whose life they have destroyed, and to show the public, that in America it doesn't matter what title you possess, how much money you make or what friends you believe you have, nobody is above the law, from the President of the United States to the CEOs of publicly traded corporations. Nobody is **“too big to fail”** (UK-1777 re: Monarchy view of British rule of America; US-2008 re: US mortgage fraud) as **“the bigger they are, the harder they fall.”** (US-1777 re: Colonialists view of British rule of America; Kaul-2021 re: **The Kaul Cases** Defendants convictions).

45. September 24, 2018 – Case Numbers: Allstate v Kaul (UNN-L-322-15) + Allstate v Casatelli (UNN-L-1762-12) + Sica v Kaul (ESX-L-7421-12) + Park v Kaul (BER-L-7116-14) + Santos v Kaul (UNN L-3322-15) + McLean v Kaul (ESX-L-802-14) + Economou v Kaul (BER-L-8607-13) + Kaul v Kaul (FM-18-254-06): Letter from Kaul to NJ Supreme Court Judge, Barry Albin

“Cases 1 to 7 are a direct consequence of the illegal suspension/revocation of my New Jersey medical license (April 2, 2012 + March 12, 2014), in which defendants in Kaul v Christie: 16-CV- 02364 ("K1") + Kaul v Christie: 18-CV-08086 ("K2") committed a massive Fraud on the Court. (Kaul v Christie: 16-CV-08086: D.E. 225) as is detailed in 'The Solomon Critique'. This matter has been referred to J.P. Coney, Chief of the Fraud+ Public Corruption Unit at the Office of the US Attorney in Washington, DC, in light of its criminal nature, and will be referred to every State Attorney General.”

I must also inform the Court that I will, in due course, be moving to have every state court judgment, that was entered against me and or my corporations, in every case that was a consequence of the illegal suspension/revocation of my medical license. I have notified the insurance carriers that paid these illegally procured judgments and have requested that that they initiate insurance fraud investigations against the plaintiffs and their respective counsel, again with a view to criminal prosecutions.

I will undo all of the injustices that were committed against me + my children + my estate + my reputation, that commenced in or around 2008 and continue to this day in the New Jersey State Superior Court System, in the above cases.”

“I believe it is important for this Court to know that Defendant Christie, an individual ... almost became the President of the United States, stands accused in the International Criminal Court of having violated Article 7, Section 1, paragraph (b) of the Rome Statute of the International Criminal Court ... request that this Court refer the within matters to J.P. Coney, Chief of the Fraud + Public Corruption Unit of the Office of the US Attorney, with a recommendation that his office file criminal charges against the aforementioned defendants.”

Every judge on the NJ Supreme Court was copied, but none reported the offenses. The state court's failure to report the crimes of **The Kaul Cases** Defendants to state/federal investigative/prosecutorial authorities, constitutes claim evidence in all cases, including K11-4. The law and legal/judicial codes of conduct hold liable those who fail to report knowledge of crimes, as well as assigning culpability.

46. September 25 + 28, 2018 – Case Number: Kaul v Christie (16-CV-02364 – K1): Letters from Kaul to K11-3 Defendant/U.S.M.J. Mannion

“I would request (Exhibit 1) that the Court grant my application ... (i) Arrest Warrant for Defendant Crist ...” (September 25, 2018)

“The defendants are responsible for these deaths [Kwak + Narag], and I will be seeking to have manslaughter charges brought against both the corporate and personal defendants.”

... the sequence of events, in order that if Defendant Crist/counsel repeat/continue their recalcitrance and or disregard for the authority of the United States District Court, then he, upon motion, be brought forthwith to the Court by the USMS, and have published such an order in 'The Muhlenberg Weekly' + 'The Morning Call'. The former is the student newspaper for the college of which he is the Chair of the Board of Trustees, and the latter is the local newspaper for Allentown, Pennsylvania, the location of Muhlenberg College. Defendants Allstate + Crist have for many decades used the media to publicly humiliate and attack physicians, who cared for their injured clients and to whom they owe money. This pattern of misconduct would not be inconsistent with Defendant Crist having used his political and economic influence in Pennsylvania to obstruct my application for a medical license.” (September 28, 2018)

“Finally, counsel's often repeated suggestion of a 'defense' that because Defendant Crist is no longer the head of Defendant Allstate New Jersey Insurance Company, that he therefore cannot be sued, is without merit ... regardless of his reconfigured relationship with Defendant Allstate, and by virtue of his ownership of significant stock, has a fiduciary responsibility to report shareholders that he has been named as a defendant in Kaul v Christie: 18-CV-08086 ... Counsel for Defendant Crist has accepted service. Two doctors are dead and further evidence has emerged of a conspiracy that is indeed “vast”. (September 28, 2018).

Both domestic and International law/courts hold liable any persons/parties/states that participate/profit from the proceeds of crime. Thus, any persons/parties/states within any commercial nexus to Defendant Allstate to the third degree, are subject to administrative/civil/criminal prosecution. Defendant

Defendant/U.S.M.J. Mannion failed to issue an arrest warrant, to compel **The Kaul Cases Defendant**, Richard Crist, to answer or otherwise plead. This fact constitutes claim evidence in K11-4 a fact that is consistent with **The Kaul Cases** Defendants' corruption of the legislative/executive/judicial branches of the State of New Jersey, and of federal/bankruptcy courts located within the geographic boundaries of the State of New Jersey.

47. October 18 + 20 2018 – Case Number: 18-49-008536 – IN THE MATTER OF THE APPLICATION FOR LICENSE TO PRACTICE AS A MEDICAL PHYSICIAN AND SURGEON OF RICHARD ARJUN KAUL, MD (IN PENNSYLVANIA): Letter from Kaul to Counsel for The Kaul Cases Defendant, PMB:

“The PMB and its counsel have violated their code of professional conduct, Pennsylvania state law and federal law by failing to report the crimes of K2 defendants to the Fraud + Public Corruption Unit of the United States Department of Justice, and in failing to do so have aided and abetted their racketeering and anti-trust violations.” (September 18, 2020)

“Discovery sought ... All documents and communications between The Office of the New Jersey Attorney General and the Office of the Pennsylvania Attorney General, referring or relating to Richard Arjun Kaul, his application for medical licensure in Pennsylvania and or any of the documents filed in Case 18-49-008536 for the defined period.” (September 18, 2020)

“Provide dates for oral examination under oath of all members of the Pennsylvania Medical Board.” (September 20, 2020)

“I understand that you and the PMB are attempting to fashion a Rooker-Feldman defense, should claims be asserted against you and the PMB in the United States District Court. With all due respect, however, your efforts are futile, as there [sic] the record/evidence indicate [sic] that I have not been afforded substantive due process. A charade of due process is an insufficient defense.” (September 20, 2018).

“... lawsuit will be filed against, amongst others, the Federation of State Medical Boards. The action will be initiated in the United States Federal Court [sic] ... and will seek to have its Interstate Agreement declared illegal. I understand that the PMB is a signatory to this agreement.”

The Kaul Cases Defendants have continued to conspire and have continued to obstruct justice (2018 to 2021) by failing to produce the evidence as required by law.

Obstruction of justice is a RICO predicate act. Thus, this constitutes an **“open-ended ongoing pattern of racketeering”** for which RICO is the only remedy to mitigate any further injury to the fundamental legal integrity of the entire system of American physician licensing, and the legal reputation every American state and the United States.

48. November 19, 2018 – Case Number: K1: Kaul v Christie (16-CV-02364): Letter from Kaul to Defendant U.S.M.J. Mannion re: RICO claim against Defendant Allstate:

“Judge Kenneth Grispin must recuse himself because he has been the subject of two interlocutory appeals filed by Kaul since July 2017 ... because his actions, words and appearance of impropriety have proved he is unable to adjudicate the matter in a fair and unbiased manner ... because Kaul and Grispin became adversaries when Kaul filed for interlocutory review of Grispin’s orders.”

“Shortly after the filing of these motions, on July 31 2018 Judge Kenneth Grispin suddenly retired, and the motions were denied on August 9, 2018 by his successor, Mark P. Ciarrocca, a lawyer appointed to the bench by K2 Defendant Christie.”

The entire NJ state court system has been corrupted by **The Kaul Cases** Defendants, which is why it aided and abetted a **“pattern of racketeering”** in the Union County Court, with a well-rehearsed **“switch and bait”** type scheme. **The Kaul Cases** Defendants initiate this scheme when a litigant threatens to expose a corrupt judge and or dismantle/disrupt the commission of their crimes within the NJ state court system. **The Kaul Cases** Defendants bribed Defendant Christie, who controlled the state courts and ordered judges to violate the law and have entered a \$6 million judgment against Kaul in February 2019. This fraudulent legal instrument, as with the illegal revocation (March 24, 2014) and every other NJ state court judgement, were then entered onto the record of the courts of other American states and the United States, thus depriving them of their constitutionally protected right to honest services. A felony punishable with life in jail.

49. November 22, 2018 – Case Numbers: K1: Kaul v Christie (16-CV-02364) + K2: Kaul v Christie (18-CV-08086): Letter from Kaul to Cliff Asness, CEO, AQR Capital Management:

“The total monetary damages sought are in excess of \$28,000 trillion, for which Allstate is liable for at least \$2 trillion, a number that exceeds ten percent (10%) of their current market capitalization of approximately \$33.3 billion.”

“Allstate has failed to disclose the lawsuit in any of its quarterly 10K SEC filings. Defendant Allstate has concealed this information from its shareholders and the equities market. There are two other defendants, TD Bank, NA + Geico, both publicly traded on the NYSE, that are similarly delinquent in their 10K SEC filings.”

“... International Criminal Court ... Defendant Allstate has become vicariously liable, consequent to having bribed Governor Christie.”

The Kaul Cases Defendants failed to disclose the lawsuits to the market because they had conspired with judges in the United States District Court to have the cases dismissed and failed to consider the weakness that the licensing reciprocity element of the “FC” conferred on them in the context of the RICO doctrine of “**new racketeering injuries**”. Basic logic and law abandoned in an abundance of “**arrogance**” and stupidity.

50. December 4, 2018 to March 15, 2021 – The Kaul Cases (Exhibit 14 to 22 – KAUL:0097 to 0444):

Within this three-year section of **The Kaul Cases** is evidence that leaves no question of material fact as to the proof of Kaul’s claims to the requisite standard for summary judgment.

Contained within the entire evidential vault of **The Kaul Cases** is evidence sufficient to secure criminal convictions of the within Defendants.

CONCLUSIVE EVIDENCE:

51. February 11, 2019 – ‘The Solomon Critique 2’ (Exhibit 20 – KAUL:0182 to 0342):

Evidence of the commission of hundreds of the RICO predicate acts of perjury/mail fraud/wire fraud/evidence tampering/obstruction of justice/conspiracy/subornation of perjury. Evidence of perjury by six (6) of the eleven (11) patients (all of whom improved after having been operated on by Kaul). Five (5) of the eleven (11) did not testify, but **The Kaul Cases** Defendants, Gregory Przybylski/Doreen Hafner/Jay Howard Solomon conspired to, and did defraud the court record with false testimony regarding the care they received from Kaul. This perjury was then used by **The Kaul Cases** Defendant, Jay Howard Solomon, to revoke Kaul’s license and impose with Defendant NJBME an illegal ‘fine’ of \$475,000.

The Kaul Cases Defendants continue to use the US mail/wires/United States District Court to transmit this knowingly illegal legal instrument as their only defense against the claims of **The Kaul Cases**, despite the fact that the evidence of ‘**The Solomon Critique 2**’, (twenty-seven thousand (27,000) lines transcript/twenty-two thousand (22,000), which is their evidence, proves that the revocation was procured illegally and is illegal.

52. February 11, 2019 – K1 - Motion for Summary Judgment re: Allstate (Exhibit 18 – KAUL:0128 to 178):

The evidence of ‘**The Solomon Critique**’ and ‘**The Solomon Critique 2**’ satisfies the “**no genuine issue of material fact**” summary judgment standard. **The Kaul Cases**

Defendants have failed to contest/rebut/refute/address the claim conclusive evidence submitted in support of the motion for summary judgment.

53. March 3, 2021 – The Kaul Cases Defendants, Allstate/Geico motion for “clarification” (Exhibit 21 -KAUL:0343 to 0364):

This submission is conclusive evidence that **The Kaul Cases** Defendants have no defense, legally cognizable or not, to any of Kaul’s claims.

54. March 15, 2021 – Kaul notice to SCOTUS re: Fraud on the Court/Nullity of Orders District of New Jersey (Exhibit 22 – KAUL:0365 to 0444):

The Kaul Cases Defendants are foreclosed from defending themselves against Kaul’s claims in any court within the geographic boundaries of the State of New Jersey and are subject to default/summary judgment in the other ninety-three (93) district courts, within the geo-political boundaries of the United States of America.

Statement of Fact

Fraudulent medical malpractice claims:

55. In a period from at least 2009 to 2018, multiple lawsuits were filed against Kaul for alleged medical malpractice. The clinical notes in all of these cases evidence that there had been no malpractice, as in over ninety percent (90%) of these cases, the patients; pain/disability improved and in the remaining ten percent (10%) it remained the same. The majority of these fraudulent insurance claims were filed after the widely publicized illegal suspension/revocation of Kaul's NJ license (2012/2014) in NJ state courts corrupted/controlled by Defendants Christie/Allstate/Brown. In the period from 2012 to 2015 on at least seven (7) occasions, the Defendants defrauded Kaul's medical malpractice carriers. The theft included the following amounts: **(i)** \$200,000; **(ii)** 450,000; **(iii)** 125,000; **(iv)** 425,000; **(v)** 750,000; **(vi)** 1,000,000; **(vii)** 605,000. A percentage of these monies constituted kickbacks to Defendant Christie and his political campaigns for the offices of the 2013 NJ Governor/2016 Republican Presidential nomination.
56. From 2009 to 2016, Defendants Allstate/Hafner used the US mail/wires to propagate these knowing fraudulent judgments to every state/federal healthcare agency, including the National Practitioners Data Bank.
57. These fraudulent judgments have been reported and re-reported hundreds of times over the US mail/wires and into the public domain using the media/internet.
58. On May 27, 2020, these fraudulent judgments were reported by the State of Pennsylvania, in a proposed order that granted Kaul's application for licensure. These fraudulent judgments, a perpetuation/consequence of the Defendants' crimes, constitute an obstruction of justice that will significantly impede Kaul's ability to procure medical malpractice insurance for future medical malpractice, unless made null/void with restitution of all monies to his prior medical malpractice carriers.
59. The Pennsylvania Medical Board, a defendant in K11-1, conspired/colluded with Defendants NJBME/Hafner/Allstate to continue violating Kaul's legal rights by filing an untimely order to review the May 27, 2020 order of the State of Pennsylvania. However, on February 8, 2021, after Kaul had filed: **(i)** a petition for a writ of mandamus in the Supreme Court of Pennsylvania (December 2, 2020); **(ii)** motion for judicial disclosure of conflicts of interest-ex parte communications; **(iii)** K11-1 (includes Defendants Pennsylvania Medical Board/Mark B. Woodland-President of PMB/University of Pittsburgh (employs member of Defendant PMB), Defendant PMB adopted in its entirety the May 27, 2020 opinion/order.
60. The May 27, 2020, however, perpetuates the Defendants schemes in that it requires Kaul to undertake a cost prohibitive 'remediation' course, employ a physician

monitor for five (5) years, a period for which his license will remain on probation. The order is engineered to entrap Kaul and further deprives Kaul of any right to defend himself against any future arbitrary/capricious/patently illegal efforts to defraud Kaul of the property of his PA medical license. As of March 15, 2021, Kaul and Defendants PMB/Woodland/University of Pittsburgh are adversaries in the United States District Court for the Northern District of Texas (K11-1). Kaul will be moving in the Supreme Court of Pennsylvania/PA Legislature to have an independent ombudsman/committee oversee Defendants PMB/Woodland/University of Pittsburgh. The oversight/watchdog element will be incorporated into **The Kaul Act**, a piece of legislation purposed to protect physicians' constitutional right to due process, in regard to the property of their medical license.

61. Since at least the late 1970s for-profit corporations (insurance/pharmaceutical/medical device/hospital) have increasingly and with lethal impunity, deprived American physicians of their legal rights/property/livelihood/liberty and on many tragic occasions, their lives (400 suicides/year). This genocidal scheme has been perpetrated in conspiracy/collusion with corrupt politicians/judges/journalists, in violation of RICO/Antitrust law and in the sole pursuit of corporate/executive profit.

62. Cited below are some examples of the blatant fraud committed by the Defendants and their equally culpable clients/patients through/by/with the politico-legal apparatus of the State of New Jersey.

63. **DOLORES SICA:**

Dolores Sica v Richard Kaul, MD et al: ESX-L-7421-12 - Lawyer/Law Firm - Abbott Brown/Lomurro/Schottland Law: Judge/Court - NJ Superior Court: Essex County: Insurance Carrier - Caitlin/Rockbridge: Physician - Michael Murphy, MD: Amount of insurance fraud - Approximately \$1.5 million (Kaul/Bergen Passaic Surgical Center)

July 5, 2007 - Consultation:

“This is a 50-year-old female, who has a history that goes back approximately five to six months and is one of severe pain in the lower back, which goes into the left leg ... The patient states that walking has become difficult ... going to the bathroom also are difficult.”

March 12, 2008 - Follow-Up Consultation:

“The patient was in today after having last been seen on 02/23/08 at which time the patient underwent the third in a series of three radiofrequency lesioning of the lumbar facet joints. The patient is having an excellent outcome to the neurotomies of the lumbar facet joints and has done very well with regards to her lower back.”

January 8, 2009 - Letter from Sica to Kaul:

"I will never forget you for your kindness and excellent work ... I hope and pray life gives you the best in life because you deserve it. Thank you again for all the help you have given me."

October 5, 2012 - Malpractice claim filed:

"Dolores Sica was caused severe injuries, causing her great pain and suffering, causing her to seek further medical treatment and incur further medical treatment ... disabling her from her normal activities ... caused to seek medical treatment ... disabled from her normal activities and employment."

In 2017, as part of Kaul's motion to vacate a default judgment, Kaul submitted a chronology of the preceding/surrounding political/legal/medical/media events.

January 11, 2017 - Sica v Kaul: Chronology of Defendants Professional Jealousy/Political Corruption/Evidence Tampering + Kaul's Professional/Personal History:

"... upper crust British accent ... widespread publicity that both attacked Dr. Kaul's reputation, and disseminated information about his assets ..."

"Dr. Kaul was credentialed by a state licensed surgical center to perform minimally invasive spine surgery. The granting of privileges was based on his qualifications, credentials, experience, peer recommendations and possession of insurance coverage. From 2002 to 2012, Dr. Kaul obtained minimally invasive spine surgery privileges at least six (6) state licensed surgical centers ..."

"Cheryl Schwartz described how Kuren had improved after the surgery, [lumbar spinal fusion] and then decided to sue after she tripped, and a fish tank had fallen on her leg."

"The pattern is almost identical, and both cases involve neurosurgeons. Schwartz concluded the letter by stating "She did this herself and she is to blame not him. I think this is insanity."

"So, the surgical procedures performed by Dr. Kaul in this case are commonly and ubiquitously performed by anesthesiologists, physiatrists, neurosurgeons and orthopedic surgeons. Furthermore, we have the benefit of two- and three-dimensional imaging studies taken after Dr. Kaul's procedure that show that the hardware he implanted was appropriately positioned and deployed."

"What did Heary say to you at your first appointment?" Kuren stated "He spoke to me about Dr. Kaul." The neurosurgeons regularly engaged in slanderous gossip about Dr. Kaul ..."

“The proceeding exposed the medical board, under the Christie regime, to be a state agency that performed his political ‘dirty work’. Christie used the medical board in a quid pro quo scheme with neurosurgeons ...”

“Truth + Justice - Dr. Kaul will submit an application for a medical license in New York State.” (On February 8, 2021, the Pennsylvania Medical Board concurred with the May 27, 2020 order of the State of Pennsylvania to grant Kaul a license. In early 2021, Kaul submitted an application to the State of New York. The matter is pending. In due course, Kaul will move Governor Philip Murphy to have Kaul’s NJ license reinstated with a public apology/compensation).

January 6, 2017 - Sica v Kaul: ESX-L-7421-12: K8 - Kaul CRITIQUE OF ‘EXPERT’ REPORTS:

Kaul submitted fact that proved the three so called ‘experts’ (Murphy/Skolnick/Deluty) were not qualified under the law to testify as to the standard regarding the performance of minimally invasive spine surgery:

“Murphy is not qualified to opine because he has no education, training, experience, or qualifications in minimally invasive spine surgery ... Murphy has no education, training, qualifications or experience in interventional spinal techniques. Murphy has rendered similarly flawed reports for the same counsel [Defendant Brown] in matters that were part of the plaintiff’s bar ‘feeding frenzy’.

“Sica’s ongoing pain is a consequence ... the two destabilizing surgeries performed with antiquated techniques, by a neurosurgeon. Sica did well after the Dr. Kaul surgery.”

February 24, 2017 - Sica v Kaul: ESX-L-7412-12: K8 - Reply to Plaintiff’s opposition to motion to vacate default judgment:

Defendant Brown opposed Kaul’s motion to vacate the default judgment, and thus Kaul alerted the court to crimes orchestrated by Defendant Christie/State of New Jersey, that included the felony of Evidence Tampering. In early 2017, Kaul made oral argument in front of Judge Annette Scoca. Defendant Brown’s colleague, Matthew Schiappa was present

“Within these arguments the ‘excusable neglect’ and ‘meritorious defense’ elements are substantiated by the plaintiff’s allegations of forged transcripts [The Solomon Critique: K1-D.E. 225 + The Solomon Critique 2: K1-D.E. 299], corruption of public officials, racketeering, mail fraud, wire fraud, new evidence and obstruction of justice. The evidence necessary to prove these elements, as is articulated in the BRIEF, did not become available to Dr. Kaul until recently.”

February 2, 2018 - Sica v Kaul: ESX-L-7412-12: K8 - Kaul motion for summary judgment/dismissal of Plaintiff’s Amended Complaint:

Kaul, cognizant of the facts that Defendant Brown had no qualified experts and the case was filed after the statute of limitations, filed a motion to have the case dismissed:

“... either suspend or revoke Kaul’s medical license ... based on the fraudulent opinions of neurosurgeons, Gregory Przybylski, MD, and interventional pain physician, Andrew Kaufman, MD, that Kaul had allegedly deviated from the standard of care because he did not possess training or board certification, in either orthopedics or neurosurgery. These two individuals also opined, with knowing falsity that the care Kaul delivered to certain patients allegedly deviated from the standard of care.”

“Here, summary judgment is appropriate for the reasons articulated below. There are no genuine issues of material fact regarding the admitted lack of any generally accepted standard in the field of minimally invasive spine surgery, and the fact that the Plaintiff’s experts pursuant to *Edward Nicholas v Christopher Mynster* (NJ Supreme Court - April 25, 2013) are not qualified to opine regarding the standard (even if one existed, which it does not) for minimally invasive spine surgery.”

The state court denied Kaul’s motion, as it was in collusion/conspiracy with **The Kaul Cases Defendants**, which include the State of New Jersey. By 2018, Judge Scoca had removed herself from the case, recognizing the criminal liability of the matter, and was replaced by Judge Jeffrey Beacham, a jurist who used the bench to perpetuate the Defendants’ crimes.

May 18, 2018 - Sica v Kaul: ESX-L-7412-12: K8 - Court Order re: scheduling of trial:

Long-time NJ state court judge, Dennis Carey, entered a trial-date order despite knowing that the revocation of Kaul’s license was illegal, and with the intent of permitting Defendant Brown to introduce the revocation into evidence, in order to prejudice the jury and secure a judgment against Kaul. Defendant Brown had already received monies from the Bergen Passaic Surgical Center. Carey permitted his court to be corrupted by the Defendants.

June 18, 2018 - Sica v Kaul: ESX-L-7412-12: K8 - Letter from Kaul to Defendant Murphy re: Professional Liability + Fraud:

Kaul, recognizing that Defendant Murphy has committed a ‘Fraud on the Court’ and forewarned him of his liability. As a consequence of the letter, Defendant Murphy withdrew from the case.

“The evidence in *Kaul v Christie* proves that the conspiracy that caused the revocation of my license of my license was conducted over a protracted period, involved multiple parties in different states, and schemes in which patients were encouraged by orthopedic surgeons and neurosurgeons to file frivolous lawsuits

against me. If evidence emerges, as the federal case proceeds, that you were part of this conspiracy, then your name and that of your practice, will be added to the list of defendants.”

“This case is frivolous and is a direct consequence of the professional jealousy and political corruption that caused the illegal revocation of my license. Kaul v Christie is a case with conclusive evidence, that I firmly believe will be successful ... move to have disciplinary proceedings instituted against the ‘experts’ involved in these cases, of which you were one.”

June 27, 2018 - Sica v Kaul: ESX-L-7412-12: K8 - Letter from Kaul to Marna P. Bergstrom, CEO, Yale New Haven Health System re: Fraud Complaint against Michael Murphy, MD:

Kaul noticed the Yale New Haven Health System, one that conducts healthcare business with Defendant Murphy, of its vicarious liability.

“Murphy’s knowingly fraudulent ‘expert’ testimony caused a number of these frivolous cases to be settled by my insurance carrier, with whom I have filed a complaint regarding the fraud and perjury committed by Murphy, the patient[s] and their lawyers.”

“Murphy continues his misconduct to this day, despite having been forewarned of its serious consequences.”

July 23, 2018 - Sica v Kaul: ESX-L-7412-12: K8 - Letter from Kaul to NJ state court judge, Dennis Carey, III re: adjournment of trial:

Kaul, having procured an expert in the field of minimally invasive spine surgery, did inform the Essex County Court and Defendant Brown, with a request for an adjournment of the trial.

“... I sent Plaintiff’s counsel an email that informed him that I would be submitting a letter on Monday July 23, 2018 ... I have received no response.”

July 27, 2018 - Sica v Kaul: ESX-L-7412-12: K8 - Court Order re: scheduling of trial:

The court, corrupted by the Defendants, and in seeking to have expedited a judgment against Kaul, did adjourn the trial by only four weeks, in full knowledge that Sica had not been produced for discovery and it would be impossible for Kaul to prepare for trial.

64. LAURA MCLEAN:

Laura McLean v Richard Kaul, MD et al: ESX-L-802-14

Lawyer/Law Firm - Bendit Weinstock/Lomurro Law/Abbott Brown: Judge/Court - NJ Superior Court, Essex County: Physician - Michael Murphy, MD: Amount of insurance fraud - Approximately \$1 million (Kaul/New Jersey Spine and Rehabilitation Surgical Center)

March 30, 2012 - Lumbar Interbody Spinal Fusion:

The clinical evidence substantiated the need for surgery.

“The patient is a female in her 50s who was initially consulted on April 3, 2012 having sustained injuries to her cervical and lumbosacral spine.”

April 10, 2012 - Consultation:

The follow-up note indicated that the surgery had improved the patient’s condition.

“The patient ... is doing very well with an improvement of symptomatology in the lower back and the legs ... The patient is making excellent progress in the postsurgical phase.”

In 2014, Defendant Brown submitted a knowingly false legal instrument into a corrupted state court, purposed to defraud Kaul’s medical malpractice carrier.

In early 2017, Kaul made oral argument in front of Judge Annette Scoca in support of his motion to vacate a default judgment. Defendant Brown’s associate, Matthew Schiappa was present with his client, Laura McLean. The latter individual briskly walked into the courtroom and upon the judge entering, she did rapidly move from the sitting to the standing to the sitting position. It was at this hearing that Kaul informed Judge Scoca of the falsification of the opinion (December 13, 2013) of **The Kaul Cases** Defendant/NJ OAL Judge, Jay Howard Solomon. Judge Scoca appeared to be shocked and asked Kaul: **“Do you have evidence?”** to which Kaul responded **“Yes”**. Schiappa, despite knowing that of **The Kaul Cases** Defendants crimes, characterized as **“specious”** this irrefutable fact, that of evidence tampering.

65. **FRANCES KUREN:**

Frances Kuren v Richard Kaul, MD et al: BER-L-2867-11

Lawyer/Law Firm - John Hoyt/Hoyt + Hoyt: Judge/Court - NJ Superior Court: Bergen County: Physicians - Defendant Kaufman/The Kaul Cases Defendant, Gregory Przybylski, MD: Amount of insurance fraud - Approximately \$2 million (Kaul/Bergen Passaic Surgery Center)

April 4, 2008 - Initial Consultation:

Kaul documented Kuren’s severe pain/disability at the initial consultation.

“... the patient has continued to experience back and leg symptomatology, which is most likely attributable to ongoing intervertebral and lumbar facet pathology.”

August 8, 2008 - Follow-Up Consultation:

Kaul's surgery caused a diminution in Kuren's pain/disability.

“The patient comes in today after having undergone a revision of lumbar interbody fusion ... the patient seemed to be doing very well ... patient seems very happy with the outcome of the surgery ...”

In 2006 Kuren was operated on by orthopedic spine surgeon Arash Emami, whose fusion surgery failed and caused nerve damage that resulted in Kuren developing a foot drop/persistent pain. Kaul was revising this failed operation. Emami was recruited by Defendant Hafner to testify against Kaul in the administrative proceedings (April 9 to June 28, 2013) that resulted in the illegal revocation of his license (March 24, 2014).

October 27, 2010 - Malpractice Claim Filed:

Kuren was encouraged by The Kaul Cases Defendant, Robert Heary, MD (neurosurgeon) to file a complaint/lawsuit against Kaul with **The Kaul Cases** Defendant, NJBME, and in the NJ Superior Court. Kuren's lawyer submitted a knowingly false legal instrument that defrauded the medical malpractice carriers of Kaul/Bergen Passaic Surgical Center of almost \$2 million.

“In or about 2008 defendants rendered medical care to plaintiff. The medical care rendered by defendants fell below accepted standards of medical care and deviated from the accepted standards of care. As a direct and proximate result of such deviations, plaintiff was severely injured, was caused to expend great sums to remedy her resultant medical conditions and remains severely injured and damaged.”

Kaul obtained surveillance footage of Kuren that showed her conducting activities she/her lawyer had falsely claimed Kaul's surgery had prevented her from doing so. On September 17, 2009, Cheryl Schwartz, an acquaintance of Kuren/patient of Kaul submitted a letter to **The Kaul Cases** Defendant, NJBME, who had commenced an investigation of Kaul ordered by Defendant Christie, who had received bribes from, amongst others, **The Kaul Cases** Defendant Heary and **The Kaul Cases** Defendant, Congress of Neurological Surgeons, all purposed to eliminate Kaul from the American minimally invasive spine surgery market, in order to illegally monopolize it, along with **The Kaul Cases** Defendants, Atlantic Health System/University Hospital.

January 15, 2013 - Kuren v Kaul: BER-L-2867-11 - K8: Letter from Juliana Barno Spitzer, Esq to Kaul re: K1/K2/K5/K11-2 Defendant Heary obstruction of justice:

“This issue was raised with Judge Slomenski ... regarding Dr. Harry so the Court can enter an Order compelling Dr. Heary to appear at the courthouse for his deposition or a Bench Warrant will be issued for his arrest.”

Defendant Heary, after having conspired with Kuren and many of **The Kaul Cases** Defendants to have Kaul's license revoked and have initiated schemes to recruit Kaul's patients to sue him, did then conspire with politicians/lawyers/judges to obstruct justice and further violate Kaul's constitutionally protected right to due process, while having adopted the color of state, consequent to a **“sympiotic”** relationship with state actors.

In a period from late 2012 to the present, Defendant Heary, in collusion/conspiracy with the NJ state government and medical board/administrative/state/bankruptcy/federal courts within the geographic boundaries of New Jersey has evaded justice.

In June 2013, Kaul served Defendant Heary with a subpoena to testify in the NJ OAL, but he failed to appear (June 27, 2013) and **The Kaul Cases** Defendant Solomon refused to enter an order compelling him to appear and then promptly closed the case on June 28, 2013.

In 2020, in K5, Defendant Heary conspired with K11-1 Defendant/Senator Cory Booker to have the United States District Court for the District of Columbia enter an order that prevented Kaul from prosecuting Heary.

On March 3, 2021, **The Kaul Cases** Defendants filed a motion in K5 in the United States District Court for the District of New Jersey-Newark (Defendant in K11-1) in front of U.S.D.J. Vazquez (Defendant in K11-3) that seeks to have an order entered that absolves the Defendants of their legal obligation to respond to claims filed by Kaul in other courts of the United States District Court.

The Kaul Cases Defendants are defenseless and guilty of the levied charges. The testimony of any one of **The Kaul Cases** Defendants/their co-conspirators/Third Party Witnesses, will irrefutably prove their guilt to a criminal standard.

March 22, 2013 - Kuren v Kaul: BER-L-2867-11 - K8: Letter from Juliana Barno Spitzer, Esq to Kaul re: arrest warrant for K1/K2/K5/K11-2 Defendant Heary:

Defendant Heary, after having conspired with Kuren to have Kaul's license revoked, obstructed/ignored court orders for his deposition. Kaul, having become aware that Defendant Heary was central to the conspiracy, moved to have him arrested/deposed:

“After the arrest, the court will then set a date for Dr. Heary's testimony.”

Defendant Heary's state lawyer produced him for deposition in late 2013, after the conclusion of the hearing in the NJ OAL (April 9 to June 28, 2013), but before K2/K5/K11-2 Defendant/NJ OAL Judge Jay Howard Solomon rendered his fraudulent opinion (December 13, 2013). Kaul attended the deposition with his lawyer, who had

retained a court videographer. Kuren's lawyer, John Hoyt, became very agitated about the filming and screamed:

“This is not Dr. Kaul’s fucking deposition”

Defendant Heary appeared extremely anxious, and Hoyt demanded the videographer be removed. He then began his examination of Defendant Heary, who testified that Kaul's use of unilateral facet screws was within the standard of care, a statement that contradicted/undermined the testimony/reports (April 2, 2012 to June 28, 2013-BDS-08959-12) provided by K1/K2/K5/K11-2 Defendant/neurosurgeon, Gregory Przybylski, MD that Kaul's placement of unilateral facet screws allegedly constituted a **“gross deviation”** from the standard of care. This fraudulent testimony was incorporated by Defendant Solomon into his knowingly illegal order to revoke Kaul's license.

On March 22, 2013, Kaul filed a lawsuit (BER-L-2256-13) against: **(i)** Robert Heary, MD (neurosurgeon); **(ii)** William Mitchell, MD (neurosurgeon); **(iii)** Frank Moore, MD (neurosurgeon); **(iv)** Gregory Przybylski, MD (neurosurgeon); **(v)** Peter Carmel, MD (neurosurgeon), the thrust of which pertained to a massive conspiracy to illegally eliminate Kaul.

The case was dismissed on November 15, 2013 for lack of prosecution as Kaul's then lawyer, John Whipple, unexpectedly withdrew from the case and Kaul was unable to find another lawyer willing to litigate the matter. In retrospect it would have made no difference as Defendant Christie had converted the judicial arms of the State of New Jersey into a **“racketeering enterprise”**, that he exploited in furtherance of his political ambitions. Defendant Christie's **“pattern of racketeering”** within state/federal investigative/prosecutorial agencies commenced in the late 1990s and involved an abuse of power in which he entrapped his political opponents in sting operations that he used to extort money/political favors under threat of incarceration. Democratic politician, Lou Manzo, was one such individual. In 2014 he published a book entitled: **“Ruthless Ambition: The Rise and Fall of Chris Christie”**. An article published on April 27, 2014 in the Hudson Reporter, states:

“From the beginning, Manzo's legal team contended that the charges were part of a conspiracy by some members of the U.S. Attorney's office to get Gov. Christopher Christie elected governor, something Christie's office denies. The Republican governor had been the U.S. Attorney in New Jersey at the launch of the investigation, and many of the people who were involved with it have moved on to work under him when he was elected governor in November 2009. Almost all of the politicians arrested in the sting were Democrats.”

In a period from late 2012 to 2013, Defendant Christie perpetrated the RICO predicate act of the trafficking of chemical weapons to Syrian rebel forces, in violation of NJ state law/US federal law/international law (Rome Treaty). On October 15, 2020, Defendant Christie admitted to knowing that these agents would be, and were used, to murder in the most horrific manner innocent children/women/men in the 2011 Syrian civil war. On

November 11, 2015, the International Criminal Court in The Hague became aware of these crimes, and in a seemingly unrelated factual matter, it extended its jurisdiction to investigate war crimes committed by the State of Israel against Palestinians. That jurisdiction, as its international mandate authorizes, extends to persons who have committed crimes against humanity in signatory states, of which Jordan is one. The Port of Aqaba in Jordan was the entry point of the chemical weapon components. On April 28, 2013 in the London Independent, its chief Middle East correspondent, Robert Fisk stated:

“And if we mention Saddam's chemical weapons, there's another glitch: because the components of these vile weapons were manufactured by a factory in New Jersey and sent to Baghdad by the US.”

On October 16, 2017, Kaul sent a letter to NJ Governor candidate, Phillip Murphy, that requested he have Defendant Christie investigated if he were to become Governor. In the letter Kaul states:

“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.”

Murphy has not investigated these crimes.

66. **MARIETTA ERNST:**

Marietta Ernst v Richard Kaul et al: OCN-L-2256-12:

Lawyer/Law Firm - WEISS & PAARZ: Pamela Brown Jones: Judge/Court - NJ Superior Court, Ocean County: Physician - Defendant Murphy: Amount of insurance fraud - Approximately \$500,000 (Kaul/New Jersey Spine and Rehabilitation Surgical Center)

August 17, 2010 - Lumbar Interbody Spinal Fusion

Kaul noted the clinical evidence in support of his recommendation for a minimally invasive lumbar fusion, to which Ernst consented.

“The patient was seen at consult on October 20, 2009. The patient has been evaluated and has persistent low back and leg pain which has not improved with conservative treatment.”

July 5, 2011 - Consultation:

Ernst improved after the successful surgery.

“The patient comes in today after having last been seen on 05/30/2011 at which time the patient was doing very well status post lumbar interbody fusion at the L3-4 level.”

Ernst gave a video testimonial in which she stated:

(2) Dr. Kaul - YouTube

“My life now feels complete because I can do whatever I want to do.”

July 23, 2012 - Malpractice claim filed:

Ernst, having been recruited by Defendant Hafner, was referred to a so called ‘politically connected’ law firm, that then used the US mail/wires to transmit a knowingly fraudulent legal instrument, that was submitted into the apparatus of the American legal system, an act that constitutes a ‘Fraud on the Court’ and an ongoing **“racketeering injury”** to Kaul. This fraudulent judgment, as with every other, was reported to the National Practitioners Data Bank and is cited in the May 27, 2020 opinion issued by the State of Pennsylvania. (the order/opinion is published on a state issued document, that is now in the public domain). Kaul’s malpractice carrier was defrauded consequent to a massive **“racketeering”** scheme orchestrated by Defendant Christie and perpetrated through the State of New Jersey, in collusion/conspiracy with **The Kaul Cases** Defendants.

“Defendants Kaul, Lager, Datta and Shahid were negligent in their care and treatment of the plaintiff and or deviated from the applicable standards of care during the time each provided care to the plaintiff ... The above said deviations and negligence by defendants Kaul, Lager, Datta and Shahid were a proximate cause of severe and permanent neurological and physical damage to plaintiff, and/or substantially increased her risk of same, as well as causing her to incur losses, damages and expenses with respect thereto.”

67. **PATRICIA MAZE:**

Patricia Maze v Richard Kaul et al: ESX-L-10253-10

Lawyer/Law Firm - John Hoyt/Hoyt + Hoyt: Judge/Court - NJ Superior Court: Essex
Physician - Defendant Kaufman/**The Kaul Cases** Defendant Przybylski: Amount of insurance fraud - approximately \$2 million (Kaul/Bergen Passaic Surgical Center)

November 21, 2008 - Lumbar Interbody Spinal Fusion:

Kaul identified the clinical evidence on which his treatment plan was based.

“The patient was initially consulted on 11/08/2007. At that time, she was a 44-year-old female ... continued to experience back and leg symptomatology and at her

initial consult had positive neurological and musculoskeletal findings which supported the recommendation for the lumbar discogram.”

January 8, 2009 - Consultation:

Maze improved after Kaul had performed a minimally invasive lumbar fusion.

“ .. has been significant improvement in her lower back and leg symptomatology and that she seems to be making a significant improvement in her condition.”

December 14, 2010 - Malpractice claim filed:

Maze, a friend of Kuren, was similarly encouraged by Kaul's competitors to file a knowingly fraudulent lawsuit and submit a complaint to **The Kaul Cases** Defendant, NJBME. Maze, as with Kuren, was told by her lawyer, that the State of New Jersey/NJ AG were planning to revoke Kaul's license, and that he would not be in a position to contest the claims, a claim from which she knew she would illegally defraud Kaul's medical malpractice carrier.

“As a direct and proximate result of such deviations, plaintiff was severely injured, was caused to expend great sums to remedy her resultant medical conditions and remains severely injured and damaged.”

Maze and her lawyer became unjustly enriched in late 2013/early 2014.

Fraudulent claim by State of New Jersey/Defendants NJBME/Hafner/Kaufman and The Kaul Cases Defendant, Gregory Przybylski/Jay Howard Solomon re: Kaul lack of qualifications to perform minimally invasive spine surgery:

68. STATE OF NEW JERSEY v RICHARD ARJUN KAUL: BDS-08959-2012:

March 25, 2012 - Letter from Defendant Kaufman to K2/K5/K11-2 Defendant Hafner re: standard of care:

In approximately 2006, Defendant Kaufman commenced conspiring with **The Kaul Cases** Defendants to have Kaul's license revoked and attempt to eliminate him from the practice of medicine, for no reason other than professional jealousy, and did, on March 25, 2012, use the US mail/wires to submit a knowingly fraudulent report to Defendant Hafner.

In the report, Defendant Kaufman did falsely state:

“... in performing total discectomies as well as fusions with the use of pedicle screws in both the lumbar spine and cervical spine has overstepped the bounds of Interventional Pain Management and as such has put patients at great risk.

This would be considered a gross deviation in the accepted standards of medical practice.”

Defendant Kaufman submitted this sworn statement with full knowledge of its falsity. The standard of care is determined not by education/training/qualifications/ but by how the procedure is performed. To perform a lumbar spinal fusion requires that the degenerated intervertebral disc be removed and replaced with either a bone graft and or a synthetic implant. It is also required that there be some form of postoperative spinal immobilization, in order for the spine to fuse. This can be achieved with either an external brace or internal construct, such as pedicle/facet screws. Kaul performed all of his spinal fusions according to these requirements. Defendant Kaufman knew this, as he reviewed the records of the patients about whom Kaul had testified on February 3, 2010, but he lied:

“I have been asked to review the following documents ... Dr. Kaul’s C.V. Transcript of meeting with NJ Board of Medicine February 3, 2010 ... Patient Records: George Housman, Sherita Lawson, Kenneth Sabo, Stephen Siefried, Tara Zetterberg.”

November 16, 2015 - Letter from Kaul to K2/K5/K7 Defendant, William Roeder:

The central principle of the equal protection clause of the United States Constitution pertains to equality of treatment/rights under the law. **The Kaul Cases** Defendants knowingly/willfully violated Kaul’s rights, in that there were many other minimally invasive spine surgeons who had been performing and continue to perform minimally invasive discectomies/fusions in the State of New Jersey. There were also, and there continue to be, many minimally invasive spine surgeons who have far less successful clinical records than Kaul and far greater complication rates. In the period from 2002 to 2012, Kaul performed approximately eight hundred (800) minimally invasive spine surgeries with good to very good outcomes in 90-95% of cases (average is 65-70%) with a complication rate of 0.1% (average is 5-15%). In March 2005, Kaul performed the first outpatient minimally invasive lumbar spinal fusion, through the use of a novel technique he invented. This technique, in 2021, is the global standard of care.

Below are links to some of the fusion procedures performed by Kaul:

(2) NJSR - Richard Raebiger - YouTube

(2) Percutaneous Lumbar Fusion - YouTube

(2) Gina Arnone - New Jersey Spine and Rehabilitation - YouTube

(2) News 12 New Jersey: Dr. Richard A. Kaul - YouTube

Kaul established that **The Kaul Cases** Defendant, NJBME, applied a different standard to **The Kaul Cases** Defendant, Heary, as this individual has for many decades

participated in schemes of public corruption with NJ state/federal politicians, including Defendant Christie. In a letter sent to the executive director of Defendant NJBME, Kaul provided the State of New Jersey an opportunity to prove it was in compliance with the law. It proved it was not, in not having taken any licensing action against **The Kaul Cases** Defendant, Heary, who lied to a patient he turned into a quadriplegic through his gross incompetence. Kaul was attacked because he was successful, a direct consequence of his superior competence, while Defendant Heary continues to receive \$3.1 million from the State of New Jersey, in addition to tens of millions of dollars from his private practice. Kaul did not bribe politicians/judges, while that is the modus operandi of many of **The Kaul Cases** Defendants. In the letter, Kaul states:

“I would like to file a formal complaint against New Jersey neurosurgeon Dr. Robert Heary for using his professional neurosurgical societies to bribe Christopher J. Christie in 2010 to have the New Jersey medical board revoke my license.”

“Robert Heary should have been disciplined in 2002 after he lied about his qualifications to patient Joseph Howard, who he then paralyzed from the neck down through his grossly negligent surgery ... \$5.2 million verdict for the thirty-five-year-old man.”

“I believe these documents are relevant to the political corruption that now clearly defines Christopher J. Christie and, without whom, Dr. Robert Heary could not have perpetrated his crime.”

Kaul received no response to the letter and no action was taken against Defendant Heary. **The Kaul Cases** Defendant, Roeder, testified against Kaul on May 23, 2013.

Fraudulent \$6 million Allstate Judgment Against Kaul + Uncontested Facts Regarding Defendants Corruption of NJ State Court System

69. Commencing in 2018, Kaul submitted a series of letters into the state court system, that sought the crimes of **The Kaul Cases** Defendants be referred to state/federal investigative/prosecutorial authorities. The crimes were NOT reported and the only response Kaul received (May 11, 2018) from the NJ Supreme Court was to inform him that no action would be initiated until the within referenced cases were filed in the appellate court. The law mandates otherwise and obligates any person/agency/court to refer a case when there exists probable cause that a crime/s have been committed. The reason for the refusal to refer was that the Defendants had/have corrupted the NJ Supreme Court.

The evidence underpinning the irrefutable facts is as below:
April 27, 2018 - Letter from Kaul to NJ Supreme Court Justice, Barry Albin:

“Fraud on the Court ... The purpose of this letter is to request that this Court refer this matter to the Department of Justice and the Office of the New Jersey Attorney General, as it constitutes a Fraud on the Court, that must lead to the criminal convictions of Jay Howard Solomon, Gregory Przybylski and Andrew Kaufman.”

May 11, 2018 - Unsigned letter from the NJ Supreme Court to Kaul:

“... this Office will be taking no action with your papers.”

June 30, 2018 - Letter from Kaul to NJ Supreme Court Justice, Barry Albin:

It should be noted that Geri Albin, Esq, is a partner with the law firm of Saiber, LLC, the firm that represents **The Kaul Cases** Defendant, Allstate Insurance Company.

“On or about May 13, 2018, I received a letter, dated May 11, 2018, from the Clerk, with the subject title, ‘Re: Letter to Justice LaVecchia dated April 27, 2018’ (copy enclosed). The unsigned letter informed me that no action would be taken, unless and until the New Jersey Appellate Court entered an order or judgment in a case that involved me. This condition has now been met in three (3) cases:”

“The testimony details misconduct of public servants who held senior positions within the Office of the Attorney General and alludes to their politically motivated abuse of the power of public office ... But as ... Richard Nixon and any number of other people found out, it’s always the cover up that gets you.”

“The canons of judicial conduct require that members of the judiciary report illegal conduct to the appropriate authorities, and do not permit themselves or their benches to participate in any cover up or become a party to a crime. Corruption within state courts is not an unfamiliar issue with the Department of Justice.”

The matter has still not been referred, and there continues to exist an obligation to refer the matter.

70. September 24, 2018 - Letter from Kaul to NJ Supreme Court Justice, Barry Albin:

Defendant Brown, in collusion/conspiracy with Defendant Christie, **The Kaul Cases** Defendants and other lawyer co-conspirators (William Crutchlow, Esq/Jeffrey Quinn, Esq/Robert A. Solomon, Esq), did with knowledge of the illegality of the purported medical malpractice judgments, continue to conspire with state court judges to use the NJ state courts to collect unlawful debt. A violation of RICO. The Kaul Cases Defendant, NJBME, committed the same crime with their attempt to collect the illegal ‘fine’ of \$475,000, that it imposed on Kaul on March 24, 2014, as part of its overall scheme to illegally revoke Kaul’s license. The latter, in addition, violates the law set forth by SCOTUS in Timbs v Indiana. Kaul submitted a petition that caused judges within the

state court system to recognize that their facilitation of the Defendants crimes was being increasingly exposed, a recognition that caused them to withdraw from the Defendants 'crucible of corruption':

"Fraud on the Court + Obstruction of Justice + Money Laundering + Mail Fraud + Wire Fraud ... I must also inform the Court that I will, in due course, be moving to have every state court judgment that was entered against me and or my corporations, in every case that was a consequence of the illegal suspension/revocation of my medical license."

"I will undo all of the injustices that were committed against me + my children + my estate + my reputation, that commenced in or around 2008 and continue to this day in the New Jersey State Superior Court System ..."

"I will ensure that defendants Christie + Solomon + Przybylski + Kaufman + Hafner are criminally prosecuted, be it in the United States, foreign jurisdictions or both ..."

"I would also request that this Court refer the within matters to J.P. Coney, Chief of the Fraud + Public Corruption Unit of the Office of the US Attorney, with a recommendation that his office file criminal charges against the aforementioned defendants."

As of March 8, 2021, the matter has still not been referred to the US DOJ, but there continues a legal obligation to do so. The NJ Superior Court continues to act in violation of the law.

71. January 16, 2019 - Kaul motion for disqualification of state court judge, Mark P. Ciarrocca in Allstate v Kaul (UNN-L-322-15):

The Kaul Cases Defendant, Allstate Insurance Company, having thoroughly corrupted the Union County Court of the NJ Superior Court system, and having ordered its judges to perpetrate a scheme that violated Kaul's constitutionally protected right to due process, did on or about January 8, 2019 file a motion to have Judge Mark Ciarrocca, enter a default judgment.

"Judge Mark P. Ciarrocca must be disqualified from the case because he was appointed to the bench by K2 defendant, Christopher J. Christie, and because his actions, words and appearance of impropriety have proved his [sic] is unable to adjudicate the matter in a fair and unbiased manner."

The scheme perpetrated by **The Kaul Cases** Defendants, and orchestrated by Defendant Christie/Allstate Insurance Company, involves having corrupted administrative/state/bankruptcy/federal courts within the geographic boundaries of New Jersey, enter knowingly illegal judgments that are then propagated into the entire

American state/federal judiciary to provide cover for their crimes, under the guise of seemingly legitimate legal orders. The greater the crime, the greater must be the cover.

72. January 22, 2019 - Letter from Kaul to NJ Supreme Court Justice, Barry Albin re: immediate stay on Allstate v Kaul (UNN-L-322-15):

Ciarrocca knew he had no authority to adjudicate the matter, as Kaul had filed a motion for his disqualification on January 16, 2019, but yet he continued, in knowing violation of the law, to remain in the case, under orders from Defendant Christie/Allstate, and with the understanding that his recusal would expose his participation in schemes of judicial corruption. **The Kaul Cases** Defendant, Allstate's "**pattern**" of judicial/political corruption has infected the entire State of New Jersey.

Consequent to Ciarrocca's refusal to disqualify himself, Kaul submitted a petition to the Supreme Court of New Jersey to have entered a writ of mandamus ordering his disqualification and an immediate stay on the case:

"Enter an order that immediately disqualifies Judge Mark P. Ciarrocca from the case ..."

"The fraud in this matter [illegal revocation Kaul's license], one that was orchestrated by corrupt state actors under the direction of K2 defendant Christie, is truly staggering, and as Kaul has pled in both K1 + K2, some of the defendants will be criminally convicted. Kaul does not believe that there has ever been such a deeply, widely and as well-organized criminal enterprise as the one that came into being when K2 defendant Christie, turned the State of New Jersey into a racketeering enterprise ... Defendant Allstate has used the state courts to file three (3) frivolous evidence-free lawsuits against Kaul since 2006."

Neither Albin nor the court refused/contested/rebutted/addressed the within facts, which caused an admission of their truth. Similarly, neither Albin nor any judges on the NJ Supreme Court referred the crimes (inclusive of chemical weapon trafficking) to state/federal investigative/prosecutorial authorities, because they had been co-conspirators in Defendant Christie's conversion of the State of New Jersey into a "**racketeering enterprise**".

73. January 25, 2019 - Order entered by Ciarrocca in Allstate v Kaul (UNN-L-322-15):

Ciarrocca, cognizant of his participation in Defendant Christie/Allstate's conversion of the NJ Superior Court system into a "**racketeering enterprise**", did nonetheless enter a knowingly illegal judgment against Kaul. The fraudulent judgment was almost \$6 million and consisted of Ciarrocca affirming Allstate's false claims that Kaul had committed insurance fraud. Allstate, having 'purchased' the Union County Court/Ciarrocca and the January 25, 2019 order, then propagated this knowingly fraudulent legal instrument across the US mail/wires into the American federal court

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

him from having any involvement in any of **The Kaul Cases**, did assign a return date for the motion. The motion and Defendant Vazquez's aiding and abetting of Defendants Allstate/Geico 'Fraud on the Court' is further evidence, if any is needed, of the proof of Kaul's claims in K11-1/K11-3, i.e., those of judicial corruption/racketeering within Defendant DNJ. Kaul will be submitting a letter into the United States District Court to establish that any orders issued by Defendant/U.S.D.J. Vazquez will have no legal weight/binding authority on any other American court (state/federal) and will be null/void.

76. In the motion, Defendants Allstate/Geico devote inordinate resources to whining about how much money the litigation has cost/is costing them, without having provided any specifics, but conveniently and not surprisingly, choose to ignore the fact that their crimes of judicial corruption are responsible for the protracted litigation. Defendants Allstate/Geico have been 'running away' from Kaul since February 22, 2016 (K1 filed), while perpetrating massive schemes of corruption against the United States and its court.

77. Further evidence of Defendants Allstate/Geico corruption of Defendant DNJ-Newark is found in the fact that on December 12, 2020, the United States District Court for the District of Columbia severed and transferred K5 to the DNJ-Camden (Exhibit ---), after Defendants Allstate/Geico had corrupted the judge by funneling bribes through her previous law firm, Boise/Schiller/Flexner, LLP. The Clerk of the Court transferred the case to the DNJ-Camden, which immediately entered an ORDER FOR SCHEDULING CONFERENCE, that obligated the Defendants to confer prior to the January 26, 2021 conference. However, the Defendants ignored Kaul's email requests to confer and from December 17 to 21, 2020, did submit seven (7) motions that sought to have K5 transferred to Defendant DNJ-Newark. On December 22, 2020, Defendant/Chief Judge Wolfson entered an order that she knew was purposed to aid and abet **The Kaul Cases** Defendants crimes against the United States, its Court, its People and Kaul. From December 29, 2020 to January 14, 2020, the K5 Defendants did file twenty-six (26) submissions purposed to have U.S.M.J./Defendant Dickson enter an order staying Kaul's prosecution of the case and on January 14, 2020, K5 was stayed. U.S.M.J./Defendant Dickson, having committed a knowing 'Fraud on the Court' then received an order from **The Kaul Cases** Defendants, Allstate/Geico, to remove himself from the case, an order he obeyed. The typical tactic of having a corrupted judge enter illegal orders and when the threat of exposure becomes too great, the judge is ordered to either retire/have the Chief Judge reassign him (just as the Catholic Church/Bishops/Pope reassigned perverted priests to different dioceses)/have him remove himself.

78. The analogies between a corrupt judiciary and the Catholic Church stem, not surprisingly, from an abuse of power and the public's astoundingly blind faith in the integrity of the individuals that wear a black robe/sit on elevated benches/receive honorifics on a daily basis. A person wearing a black cassock/robe is, as with all humans, flawed, and possesses a complete download of Original Sin. The only difference between these individuals and most of the rest of humanity is that the

majority of society unquestioningly trusts them. It is this element in conjunction with the immense power society has given them that causes some of them to become criminals, just as did certain Catholic priests. The story of man's corruption by power began with the birth of man.

79. In the motion filed in K1 on March 3, 2021 by Defendants Allstate/Geico, they submit a table that evidences their corruption of Defendant DNJ-Newark, a table that shows the absolute corruption they have wrecked on Defendant DNJ-Newark. It is also a table that shows how in their frenzied five (5) year scheme (February 22, 2016 to February 22, 2021) to obstruct justice, in order to prevent Kaul from further exposing their prior criminal acts (2006 to 2016), their increasingly desperate/corrupt practices have become a net/death trap of their own making, and one in which they have unwittingly ensnared themselves. Defendants Allstate/Geico are in an increasingly isolated position, in that they had Defendants/U.S.D.J. Vazquez-U.S.M.J. Dickson stay K2/K3/K4/K5/dismiss P1/P2, which thus restricted them to K1, a case they admit is on appeal in the Third Circuit and a case, therefore, that has no jurisdiction/authority/amendment/so called "**clarification**" power over any aspect of K1. They are in the midst of defeat and the rout, already in effect, will intensify as **The Kaul Cases** expand inexorably, into both domestic (state/federal) and international courts. **The Kaul Cases** Defendants, Allstate/Geico's pleas to want to conserve the resources of a "**sister**" court are further evidence of their judgment clouding desperation. Their only option is capitulation, a deed that will surely conserve the Court's resources.

80. **The Kaul Cases** Defendants fifteen (15) year self-sabotaging crime spree is like the net of a fisherman, that is cast foolishly into unchecked winds, only to be blown back by the immutably unseen forces of that wind and entrap the fisherman in his own trap.

81. Allstate's scheme/tactics of judicial/political/media/medical board corruption operate in the following manner:

82. **Allstate/Corporate Shareholders as Plaintiff/Bankruptcy Debtor** - (i) permit physician/healthcare provider to treat clients/patients for 3-6 years; (ii) refuse to reimburse physician/healthcare provider for 3-6 years; (iii) after 3-6 years order state/federal investigative/prosecutorial authorities to initiate an administrative/civil/criminal investigation purposed to suspend/revoke professional licenses and or file criminal indictment (Allstate, through schemes of political corruption/bribery, manipulates state/federal politicians into abusing the power of public office to facilitate these investigations/prosecutions); (iv) ensure that all criminal investigations, in collusion/conspiracy with state/federal agencies, are conducted under the cover of administrative-medical board/civil litigation, in order to deprive physician/healthcare provider of their constitutional protections pursuant to the Fifth (5th) Amendment; (v) file evidence-free administrative/medical board/civil/criminal charges in courts in which the judges have been bribed; (vi) have the state AG issue a press release written by lawyers for Allstate, that falsely portray the physician/healthcare provider as guilty; (vii) have local media outlets, in which Allstate either holds shares/conducts business, publish slanderous stories/articles designed to

prejudice the public against the physicians/healthcare providers; **(viii)** have the state AG warn NJ lawyers either not to assist the physician/healthcare providers or if they do, to pressure them into settling the case, but only after they have extracted hundreds of thousands of dollars in so called 'legal fees' (the purpose is to exhaust the physician/healthcare provider financial resources); **(ix)** conspire with patients/lawyers to file knowingly false medical malpractice claims against the physician/healthcare provider as part of their strategy to overwhelm them with litigation/associated costs; **(x)** publicize and use the litigation to cause the physician/healthcare provider to become ostracized; **(xi)** use the state AG to propagate false narratives/confidential information about the physician/healthcare provider, in order to destroy the reputation of the physician/healthcare provider; **(xii)** have the corrupted judge deny all motions, including discovery, filed by the physician/healthcare provider; **(xiii)** have the corrupted judge grant all motions filed by Allstate; **(xiv)** funnel bribes to the corrupted judge each time he follows an order, thus ensuring the judge is tightly controlled; **(xv)** communicate with the corrupted judge through 'back-channel' private server systems; **(xvi)** instruct corrupted judges to withdraw from the bench or the case, if and when the Defendant files letters/motions for disqualification, based on allegations of bribery; **(xvii)** instruct corrupted judges not to disclose their financial holdings/conflicts of interest/ex parte communications to the record; **(xviii)** if judges do retire, ensure they do not disclose their crimes on the bench, by funneling work to them as partners in corrupted law firms; **(xix)** force settlement on physician/healthcare providers by initiating litigation against family/friends/employees/colleagues/acquaintances with threats/acts of license suspension/revocation and or arrest/criminal indictment/conviction/incarceration: **(xx)** if the case goes to trial, have the judge deny a jury/taint the jury with negative pre-trial publicity/have the judge restrict evidence submitted by the physician/healthcare provider/deny the physician/healthcare provider the right to depose corrupted politicians and or the insurance executives/lawyers involved in bribing them; **(xxi)** have the corrupted bankruptcy judge/trustee file motions/enter orders to eliminate Allstate's debt to the physician/healthcare provider.

83. Allstate/Corporate Shareholders as Defendant - **(i)** have the case transferred into a corrupted state/federal court within the geographic boundaries of the State of New Jersey; **(ii)** employ the tactics identified above.

84. The Defendants knowingly/willfully/with malice aforethought did defraud: **(i)** Kaul; **(ii)** his malpractice carriers; **(iii)** the New Jersey taxpayer; **(iv)** the New Jersey public; **(v)** Kaul's patients; **(vi)** The New Jersey Superior Court; **(vii)** The United States Bankruptcy Court for the District of New Jersey; **(viii)** the American public of millions of dollars (tax revenue/income/medical malpractice funds), their right to honest services.

Defendants Global Scheme of Obstruction of Justice:

85. In a period from April 2, 2012, Defendant Hafner, in collusion/conspiracy with **The Kaul Cases** Defendants, did engineer and perpetrate a massive global scheme of obstruction of justice, by using the US mail and wires to co-opt both domestic/foreign

state medical boards/councils into not issuing Kaul a license/medical registration if he should apply.

86. **The Kaul Cases** Defendants did participate in thousands of communications to the effect that because Kaul had personal/professional relationships with the international medical community, he would be able to obtain a license/registration in another state/country, and that this would provide him with monies he could use to have lawyers prosecute the Defendants in both domestic/foreign courts. The Defendants recognized that these prosecutions would expose their crimes and cause their economic decimation/reputation annihilation/incarceration.

87. On February 8, 2021, the Pennsylvania Medical Board entered a FINAL ORDER, adopting an opinion issue on May 27, 2020 by David Green, Esq, an administrative hearing officer employed by the State of Pennsylvania. The order granted Kaul's application for licensure in the State of Pennsylvania. In support of this application, Kaul submitted evidence filed in **The Kaul Cases**, that proves the suspension/revocation (April 2, 2012/March 24, 2014) were and are illegal.

88. The following facts expose the depth and breadth of the Defendants conspiracy to obstruct justice in every state medical board (---), the State of Pennsylvania (---), the United States District Court (---) and the United States Government (---). The facts of the Defendants scheme to obstruct justice/judicial corruption in the United States District Court, follow a similar "**pattern**" of corrupting or otherwise influencing judges/politicians into abusing their power to prevent Kaul from commencing discovery in any of **The Kaul Cases**. In the Defendants 'Conspiracy Room' the exchanges include, but are not limited to, discussions that if any one of the Defendants/co-conspirators/Third-Party Witnesses are subjected to oral examination by Kaul, it will result in the production of further highly incriminating evidence of their decades-long criminal enterprise/crimes.

89. In a period from April 2, 2012 to the present Defendants FSMB/CTMB/NJBME did use the US mail/wires and engage in face-to-face meetings, the purpose of which was to attempt to obstruct Kaul from obtaining a medical license/registration anywhere in the United States and or the rest of the world. On or about the end of September/beginning of October, Defendant CTMB did deny Kaul's pre-application for medical licensure, based on the revocation by Defendant NJBME, despite being presented with evidence that the revocation was procured illegally.

90. Defendant CTMB did admit to violating Kaul's constitutional rights by incorporating the illegal revocation (March 24, 2014) into its denial of Kaul's pre-application (September/October 2020).

91. Defendant CTMB did use the US mail/wires to exchange information with Defendant CGLIC that related to **The Kaul Cases** Defendants scheme to attempt to provide cover for their crimes by eliminating Kaul from the practice of medicine/the United States by obstructing his efforts to procure a state license.

92. Defendants CTMB/CGLIC did use the US mail/wires to exchange information with **The Kaul Cases** Defendants regarding Defendant Hafner's tactics of using the US mail/wires to disseminate a knowingly fraudulent legal instrument (revocation order of Defendant NJBME-March 24, 2014) to Defendant FSMB/National Practitioners Data Bank/DEA/Medicare/SMB/American Board of Anesthesiology and multiple other agencies identified in reports issued by the NPDB.

93. Defendant Hafner did know that in using the US mail/wires to transmit a fraudulent legal instrument, she was committing a 'Fraud on the Court' against the United States Government/NPDB/Medicare/DEA, as she had planned with **The Kaul Cases** Defendants.

Legal Claims

RICO 1

**Enterprise - The State of New Jersey-Connecticut ("NJC-E")
Defendant Persons - Christie/Brown/Hafner/Murphy
Pattern of Racketeering/RICO Predicate Acts - Mail Fraud/Wire
Fraud/Perjury/Conspiracy/Obstruction of Justice/Bribery/Kickbacks/Evidential
Tampering/Witness Tampering**

94. The Defendants are "persons" pursuant to RICO, and did, in a period commencing in 2012 conduct a "pattern of racketeering" through the State of New Jersey, through the commission and or subornation of thousands of acts of mail fraud/wire fraud/bribery/obstruction of justice/perjury/conspiracy.
95. The Defendants did knowingly and with malice, violate RICO with the intent and purpose of causing immense harm to the economic standing and reputation of Kaul, in order to attempt to prevent him from ever earning a livelihood anywhere in the world, and to strip him of his ability to support his children.
96. The Defendants were motivated to cause these "**racketeering injuries**" to Kaul as they believed it would further their economic and political agendas and did so in the knowledge that their crimes constituted a violation of RICO.
97. The Defendants believed that their crimes would go undetected because in their estimation, Kaul, having been driven into a state of poverty, would be unable to retain lawyers, without whom, they believed, he would not be able to initiate an investigation and prosecution of the CBM-AIF-E Defendants.
98. The Defendants also believed their crimes would go undetected because they believed that after having subjected Kaul to a four-year long campaign of widely publicized slanderous media attacks, he would become socially isolated, ostracized, living in a state of poverty and unable to find any material means to even survive.
99. The Defendants believed that their crimes would destroy Kaul, and that he would be forced to leave the country, and thus ensure their crimes went undetected.
100. The Defendants believed that even if Kaul attempted to have their crimes detected, it would be impossible as they calculated that their deprivation of Kaul's legal rights had been conducted under the color of state, through administrative/state/federal courts within the geographic boundaries of New Jersey, and that this charade would immunize them from prosecution.
101. The CBM-AIF-E Defendants believed that even if Kaul, without a lawyer, attempted to bring a prosecution against them, it would be quashed by judges they had

corrupted or controlled (politically/economically) in state/bankruptcy/federal courts within the geographic boundaries of New Jersey.

102. The CBM-AIF-E Defendants believed that even if Kaul, without a lawyer, attempted to bring a prosecution against them in a court outside of New Jersey, they would use their political influence to have the case transferred to the United States District Court for the District of New Jersey-Newark, a court whose judges they have corrupted, and a court whose judges are now Defendants in K11-3.

103. The CBM-AIF-E Defendants, in perpetrating their racketeering schemes, were cognizant of the fact that their crimes would defraud Kaul's medical malpractice carriers of millions of dollars, would cause these injured carriers to raise the cost of medical malpractice insurance, would defraud the public of their right to honest services and would defraud Kaul of the entirety of his assets and his reputation.

104. Despite being fully cognizant of the criminality of their schemes, the CBM-AIF-E Defendants did conspire and knowingly violate RICO, in the belief that their misconduct would, for the aforementioned reasons, go undetected.

105. In a period commencing in at least 2012, the CBM-AIF-E Defendants did conspire to and did conduct a "pattern of racketeering" as RICO "persons" through the CBM-AIF-E, in collusion and conspiracy with multiple co-conspirators (lawyers/judges/physicians/journalists/insurance executives/hospital executives) involving the judicial/political/physician regulation systems/courts of the State of New Jersey, the purpose of which was to further their economic/political agendas through the knowingly illegal exploitation of the economic/professional welfare of Kaul, and a defrauding of Kaul's medical malpractice insurance carriers.

106. The scheme consisted of the perpetration of thousands of RICO predicate acts, including mail fraud/wire fraud/obstruction of justice/perjury/bribery/kickbacks/conspiracy, conducted across the US mail and wires.

107. The purpose of the scheme was to destroy Kaul, by having him either jailed/deported/killed, in order to eliminate past financial debt, future financial liability and the threat his work posed to his competitors in the American minimally invasive spine surgery market.

108. Defendant Christie + Defendant Hafner:

Date range: 2010 to 2017.

Conduits of Communication + Bribery to Christie:

Through state government intermediaries.

Mode of communications: Email + Voice Message + SMS + Face-To-Face

Substance of communications:

(i) Scheme to encourage patients to initiate civil litigation and medical board complaints against Kaul and similarly trained physicians. (ii) Scheme to obstruct justice by abusing the power of political/public office to corrupt NJ state court judges into entering

fraudulent judgments against Kaul and his medical malpractice carriers. **(iii)** Scheme to file complaints against Kaul with state and federal regulatory authorities. **(iv)** Scheme to participate in sham litigation against Kaul. **(v)** Scheme to participate in sham litigation against Kaul's physician employees. **(vi)** Scheme to revoke Kaul's license. **(vii)** Scheme to destroy Kaul's reputation. **(viii)** Scheme to destroy Kaul's economic standing. **(ix)** Scheme to have Kaul ostracized. **(x)** Scheme to have Kaul leave the United States. **(xi)** Scheme to have co-conspirator and NJ Administrative Law Judges, Jay Howard Solomon buttress co-conspirator, Gregory Przybylski's knowingly false testimony that every aspect of the care Kaul delivered to his patients "grossly deviated" from the standard of care. **(xii)** Scheme to have Defendant Hafner pervert the course of justice by buttressing Defendant Przybylski's knowingly false testimony that every aspect of the care Kaul delivered to his patients "grossly deviated" from the standard of care. **(xiii)** Scheme to engage in evidence tampering and perjury in the administrative board proceedings, that caused the revocation of Kaul's license, as evidenced in 'The Solomon Critique' (K1-D.E. 225 Page ID 4940) and 'The Solomon Critique 2' (K1-D.E. 299 Page ID 7202). **(xiv)** Scheme to violate Kaul's right to due process, his right to an impartial tribunal and his civil rights, through the commission of knowingly false testimony that Kaul had allegedly "grossly deviated" from the standard of care for reasons pertaining to qualifications, credentials, alternative privileges and hospital privileges. Defendant Hafner knew that under the law the standard of care is not determined by any of these reasons, but simply by the manner in which the care is delivered, but yet in this knowledge she abused the power of public office for personal and political gain, at the expense of the public. **(xv)** Scheme to abuse the power of public office and quasi-judicial proceedings to perpetrate a massive fraud on the public, by willfully misrepresenting that Kaul was not qualified, credentialed or licensed to perform minimally invasive spine surgery. The defendants knew that Kaul possessed a license to practice medicine and surgery, had been credentialed by at least six state licensed surgical centers to perform minimally invasive spine surgery, did not require alternative or hospital privileges to perform minimally invasive spine surgery, had commenced his training in minimally invasive spine surgery in 2002, three years before co-conspirator Gregory Przybylski, a market competitor and 'expert' for Defendant NJBME. **(xvi)** Scheme to propagate to the public, a knowingly false interpretation of the alternative privilege regulation, in the knowledge that they were abusing the power of public office for personal and political gain. The defendants knew that Kaul did not require alternative privileges to perform minimally invasive spine surgery in his outpatient surgical center. **(xvii)** Scheme to suppress evidence of the superior clinical outcomes of Kaul's minimally invasive spine surgery practice, by refusing to have Kaul's practice independently analyzed and monitored. **(xviii)** Scheme to engage in obstruction of justice by ignoring Kaul's written requests for an independent investigation of Kaul's claims of evidence tampering. **(xix)** Scheme to participate in a knowingly illegal system of physician regulation, that violated Kaul's civil rights, his constitutionally protected right to due process and his right to an impartial tribunal, by willfully conducting proceedings through and by Defendant NJBME, the New Jersey Office of Administrative Law and the Office of the New Jersey Attorney General. These governmental agencies are all subservient to the executive branch of state government. This is an illegal configuration that violates the separation of powers principle of the

United States Constitution, a principle that protects citizens due process rights when life, liberty and property are at stake. **(xx)** Scheme to abuse the authority of the office of the Governor of the State of New Jersey for the purposes of accepting bribes, as part of a series quid pro quo schemes purposed to have Defendant NJBME revoke Kaul's license + Scheme to violate Kaul's right to due process by failing to exclude Defendant Hafner from any further involvement in Kaul's case and or his application in 2014 for reinstatement of his medical license. This was a knowing and willful violation based on the fact that Kaul had filed an ethics complaint against Hafner in September 2013.

(xxi) Scheme to deprive Kaul of his civil rights and right to due process by permitting Defendant Hafner, an individual involved in a personal relationship with Defendant Kaufman, who, like Defendant Kaufman, had demonstrated an inexplicable personal animus towards Kaul.

Tactics Employed:

The Defendants scheme involved the following tactics, at the center of which lay the 'pawn' like manipulation of Kaul's patients to provide false testimony against Kaul, and perjure themselves by claiming that their pain increased after the care they received from Kaul:

The illegal revocation of Kaul's license + The manipulation of public opinion against Kaul + The filing of multiple frivolous medical malpractice lawsuits in corrupted NJ state courts - Essex County/Union County):

(i) Conspire to and commit bribery by funneling bribes in a series of quid pro quo schemes to Defendant Christie from the NJ plaintiff's bar, Defendant Brown, the American Association of Orthopedic Surgeons and Defendant Murphy to have co-conspirator, New Jersey Board of Medical Examiners ("NJBME") revoke Kaul's license. **(ii)** Conspire to and collude with media co-conspirators, North Jersey Media Group/NJ. Com (Star Ledger) to publicize articles about the revocation/lawsuits, purposed to legitimize their crimes in the public eye and recruit more of Kaul's patients to file lawsuits. **(iii)** Conspire to and encourage patients to file lawsuits and complaints with co-conspirator, NJBME. **(iv)** Conspire to and encourage patients to file complaints with state and federal regulatory authorities, that the Defendants knew were false. **(v)** Conspired to and did participate in sham litigation and provided knowingly false testimony that caused the entry of multi-million-dollar judgments against Kaul and his medical malpractice carrier. **(vi)** Conspired to and did cause the filing/publication of these false judgments with the National Practitioners Data Bank, the State of New Jersey and in collusion with media co-conspirators, North Jersey Media Group/www.nj.com, into the public domain and onto the internet. **(vii)** Conspired to and did use the US mail and wires to cause a dissemination of these knowingly false judgments to members of the New Jersey medical/political/legal communities, the purpose of which was to aid and abet the destruction of Kaul's reputation. **(viii)** Conspired to and did provide knowingly false testimony under oath that the care Kaul delivered to his patients "grossly deviated" from the standard of care because Kaul did not possess alternative privileges or hospital privileges. **(viii)** Conspired to and did provide knowingly fraudulent testimony under oath that the care Kaul delivered to his patients "grossly deviated" from the standard of care, because Kaul's training did not involve an orthopedic or neurosurgical residency. **(ix)** Conspired to and did participate in sham litigation against Kaul's physician employees, falsely testifying that they were not

qualified to perform minimally invasive spine surgery and had committed insurance fraud. **(x)** Conspired to and did participate in sham litigation purposed to professionally ostracize Kaul, cause him to leave the United States and prevent him from publicly exposing the Defendants crimes. **(xi)** Use of the US mail and wires to send patients letters/contact via telephone encouraging them to file frivolous lawsuits against Kaul. **(xii)** Use of the US mail and wires to defraud patients of their right to honest services by communicating knowingly false information that Kaul was not qualified to perform minimally invasive spine surgery. **(xiii)** Use of the US mail and wires to send knowingly false information to personal injury attorneys that Kaul was not qualified to perform minimally invasive spine surgery, had committed insurance fraud and was going to be indicted by the US Attorney for the District of New Jersey. **(xiv)** Use of the US mail and wires to send knowingly false information to New Jersey politicians, encouraging them to coerce co-conspirator, NJBME, to revoke Kaul's license. **(xv)** Use of the US mail and wires to order NJ state court judges to enter judgments against Kaul and his malpractice carrier in any and all medical malpractice cases filed against him. **(xvi)** Conspire and collude with law/public relation/political lobbying firms to funnel kickbacks to Defendant Christie, as part of a knowingly illegal series of quid pro quo schemes, in which a percentage of the judgments were given to Christie in return for him using his executive power to have Kaul's license revoked, order corrupted state court judges to enter multi-million dollar judgments against Kaul/his medical malpractice carrier and order the New Jersey media to publicize each and every judgment. **(xvii)** Conspire and collude with the legal/political apparatus of the State of New Jersey to perpetrate a knowingly illegal scheme to defraud Kaul, his medical malpractice carrier and the public of their property, their right to honest services and medical care. **(xviii)** Conspire and collude to deprive Kaul of his constitutionally protected right to an impartial tribunal in proceedings, the outcomes of which resulted in the loss of his livelihood, property and liberty.

109. **(xix)** Conspire and collude to use the US mail and wires to order members of the New Jersey medico-legal community to not provide expert testimony or legal services in his defense of these frivolous medical malpractice lawsuits. **(xx)** Conspire and collude to use the US mail and wires to transmit information in furtherance of Defendant Christie's scheme to illegally have his attorney general and acting director of the division of consumer affairs have co-conspirator, NJBME, revoke Kaul's license. **(xxi)** Conspire and collude to obstruct justice by bribing or abusing the power of public office to corrupt state court judges into rendering multi-million-dollar judgments against Kaul and his medical malpractice carrier. **(xxii)** Conspire and collude to use the US mail and wires to transmit the illegal consequences of a massive 'Fraud on the Court' (the revocation/state court judgments) to the public, national (state/federal) and international healthcare agencies/regulatory bodies, in furtherance of the Defendants scheme to destroy Kaul's reputation globally, his livelihood, his economic standing and prevent him from obtaining a medical license anywhere in the world, or indeed any form of employment. **(xxiii)** Further evidence of both Defendant Hafner's abusive/corrupted/illegal state-of-mind and the abusiveness of the illegal system of physician regulation is found in a letter (Exhibit ---) transmitted by Defendant Hafner to Defendant NJBME using the US mail/wires, in which she re-publishes verbiage Kaul's then lawyer, Michael Keating, instructed him to include in his 2014/2015 application for reinstatement of his NJ license. In Defendant Hafner's letter (March 3, 2015), with

knowledge that the suspension/revocation of Kaul's license was illegal, Defendant Hafner, instead of reporting the crime to state/federal investigative/prosecutorial authorities, perpetuated the crime by using the US mail wires to further propagate the falsehoods that Kaul was not qualified to perform minimally invasive spine surgery and had injured patients. Defendant Hafner knew these were lies, but even into 2015 continued to commit a fraud against Kaul, the public and the United States.

Location:

Governor's Office in Trenton + Christie/Republican Political Fundraisers + Office of the NJ AG.

95. Defendant Christie + Defendant Brown:

Date range: 2010 to 2017.

Conduits of Communication + Bribery to Christie:

Political lobbyists + Public Relation Firms (Mercury Public Relations + Princeton Public Relations) + Law Firm of Lomurro Law

Mode of communications: Email + Voice Message + SMS + Face-To-Face

Substance of communications: See above. As with Defendant Christie + Defendant Hafner.

Tactics Employed: See above. As with Defendant Christie + Defendant Hafner.

Location: Governor's Office in Trenton + Christie/Republican Political Fundraisers.

96. Defendant Hafner + Defendant Brown:

Date range: 2010 to 2017.

Mode of communications: Email + Voice Message + SMS + Face-To-Face

Substance of communications: See above. As with Defendant Christie + Defendant Hafner.

Tactics Employed: See above. As with Defendant Christie + Defendant Hafner.

Location: Office of the NJ AG + Office of Lomurro Law + NJ Office of Administrative Law + New Jersey Superior State Court

97. Defendant Hafner + Defendant Murphy:

Date range: 2010 to 2017.

Mode of communications: Email + Voice Message + SMS + Face-To-Face

Substance of communications: (i) Scheme to encourage patients to initiate civil litigation and medical board complaints against Kaul and similarly trained physicians. (ii) Scheme to obstruct justice by abusing the power of political/public office to corrupt NJ state court judges into entering fraudulent judgments against Kaul and his medical malpractice carriers. (iii) Scheme to participate in sham litigation against Kaul. (iv) Scheme to participate in sham litigation against Kaul's physician employees. (v) Scheme to revoke Kaul's license. (vi) Scheme to use the NJ state court system to propagate the knowingly fraudulent arguments submitted by Defendants Hafner/Kaufman and co-conspirator, Gregory Przybylski, in the administrative board proceedings (April 9 to June 28, 2013). (vii) Scheme to use the NJ state court system to propagate the knowingly illegal opinion issued on December 13, 2013, by co-conspirator/administrative law judge, Jay Howard Solomon.

Tactics Employed: **(i)** Conspired to and did participate in sham litigation and provided knowingly false testimony that caused the entry of multi-million-dollar judgments against Kaul and his medical malpractice carrier. **(ii)** Conspired to and did cause the filing/publication of these false judgments with the National Practitioners Data Bank, the State of New Jersey and in collusion with media co-conspirators, North Jersey Media Group/www.nj.com, into the public domain and onto the internet. **(iii)** Conspired to and did provide knowingly false testimony under oath that the care Kaul delivered to his patients “grossly deviated” from the standard of care because Kaul did not possess alternative privileges/hospital privileges and did not participate in an orthopedic/neurosurgical residency. **(iv)** Conspired to and did participate in sham litigation against Kaul’s physician employees, falsely testifying that they were not qualified to perform minimally invasive spine surgery and had committed insurance fraud. **(v)** Conspired to and did participate in sham litigation purposed to professionally ostracize Kaul, cause him to leave the United States and prevent him from publicly exposing the Defendants crimes. **(vi)** Use of the US mail and wires to defraud patients of their right to honest services by communicating knowingly false information that Kaul was not qualified to perform minimally invasive spine surgery. **(vii)** Conspire and collude with the legal/political apparatus of the State of New Jersey to perpetrate a knowingly illegal scheme to defraud Kaul, his medical malpractice carrier and the public of their property, their right to honest services and medical care. **(viii)** Conspire and collude to deprive Kaul of his constitutionally protected right to an impartial tribunal in proceedings, the outcomes of which resulted in the loss of his livelihood, property and liberty.
Location: Office of the NJ AG + Law Firm of Lomurro Law + NJ State Superior Court.

98. Defendant Brown + Defendant Murphy:

Date range: 2010 to 2018.

Mode of communications: Email + Voice Message + SMS + Face-To-Face

Substance of communications: **(i)** Scheme to encourage patients to initiate civil litigation and medical board complaints against Kaul and similarly trained physicians. **(ii)** Scheme to obstruct justice by corrupting NJ state court judges into entering fraudulent judgments against Kaul and his medical malpractice carriers. **(iii)** Scheme to participate in sham litigation against Kaul. **(iv)** Scheme to participate in sham litigation against Kaul’s physician employees. **(v)** Scheme to use the NJ state court system to propagate the knowingly fraudulent arguments submitted by Defendants Hafner/Kaufman and co-conspirator, Gregory Przybylski, in the administrative board proceedings (April 9 to June 28, 2013). **(vi)** Scheme to use the NJ state court system to propagate the knowingly illegal opinion issued on December 13, 2013, by co-conspirator/administrative law judge, Jay Howard Solomon.

Tactics Employed: **(i)** Conspired to and did participate in sham litigation and provided knowingly false testimony that caused the entry of multi-million-dollar judgments against Kaul and his medical malpractice carrier. **(ii)** Conspired to and did cause the filing/publication of these false judgments with the National Practitioners Data Bank, co-conspirator, State of New Jersey, and in collusion with media co-conspirators, North Jersey Media Group/www.nj.com, into the public domain and onto the internet. **(iii)** Conspired to and did provide knowingly false testimony under oath that the care Kaul delivered to his patients “grossly deviated” from the standard of care because Kaul did

not possess alternative privileges/hospital privileges and did not participate in an orthopedic/neurosurgical residency. **(iv)** Conspired to and did participate in sham litigation against Kaul's physician employees, falsely testifying that they were not qualified to perform minimally invasive spine surgery and had committed insurance fraud. **(v)** Conspired to and did participate in sham litigation purposed to professionally ostracize Kaul, cause him to leave the United States and prevent him from publicly exposing the Defendants crimes. **(vi)** Use of the US mail and wires to defraud patients of their right to honest services by communicating knowingly false information that Kaul was not qualified to perform minimally invasive spine surgery. **(vii)** Conspire and collude with the legal/political apparatus of the State of New Jersey to perpetrate a knowingly illegal scheme to defraud Kaul, his medical malpractice carrier and the public of their property, their right to honest services and medical care. **(viii)** Conspire and collude to deprive Kaul of his constitutionally protected right to an impartial tribunal in proceedings, the outcomes of which resulted in the loss of his livelihood, property and liberty. **(ix)** Conspire to propagate and propagate within the New Jersey Superior Court system, the December 13, 2013 opinion of **The Kaul Cases** Defendant/co-conspirator, Jay Howard Solomon (NJ OAL Judge), a knowingly fraudulent legal instrument, the product of a massive 'Fraud on the Court' (revocation) committed by the K1/K2 Defendants. **(x)** Conspire to use and use the US mail and wires to transmit a knowingly fraudulent legal instrument in furtherance of the scheme to defraud Kaul/his malpractice carrier of their property. **(xi)** Conspire with judges in the New Jersey Superior Court system to use its legal apparatus to perpetuate the fraud committed in the NJ OAL, to defraud the public of its right to honest services through the commission of schemes of judicial corruption and to fraudulently obtain multi-million-dollar judgments from Kaul's malpractice carrier. **(xii)** Conspire with judges in the NJ Superior Court system to manufacture knowingly fraudulent legal judgments in an attempt to provide further legal cover for the crimes (2006 to 2018) committed by **The Kaul Cases** Defendants in administrative/state/bankruptcy/federal courts within the geographic boundaries of co-conspirator, State of New Jersey. **(xiii)** Conspire to propagate and propagate the knowingly false arguments submitted by **The Kaul Cases** Defendants, Kaufman/Przybylski/Hafner, in the administrative hearing (April 9 to June 28, 2013), by using the US mail/wires and the politico-legal apparatus of the State of New Jersey. **(xiv)** Conspire to provide kickbacks and provide kickbacks to **The Kaul Cases Defendant** Christie as part of a quid pro quo scheme, in which Defendant Christie abused the power of the state to have Kaul's license illegally revoked, have the event widely publicized for almost four (4) years, order courts within the geographic boundaries of New Jersey to deny/obstruct Kaul's defenses, expedite the entry of illegal judgments against Kaul/his medical malpractice carrier, have his AG continue to recruit/encourage Kaul's patients to sue him and order the entire politico-legal apparatus of the State of New Jersey to not provide Kaul with medical expert or legal assistance in his defense of the cases.

Location: Across the US mail and wires + Law Firm of Lomurro Law + NJ State Superior Court.

RICO 2

**CGLIC/AQR/Christie/Allstate
CAC Association-In-Fact Enterprise (“CAC-AIF-E”)
Defendant Persons - Christie/CGLIC/AQR/Allstate
Pattern of Racketeering/RICO Predicate Acts - Mail
Fraud/Wire/Conspiracy/Obstruction of Justice/Bribery/Kickbacks**

99. In a period that commenced in at least 2009, the Defendants devised, implemented and perpetrated a knowingly illegal scheme through a “**pattern of racketeering**” purposed to advance the economic/political interests of the Defendants, that was conducted by and through the CAC-AIF-E, that was aided/abetted by co-conspirators within the NJ political/medical/legal/judicial communities and was conducted under the cover of administrative/state/bankruptcy/federal courts within the geographic boundaries of co-conspirator State of New Jersey.

100. In 2009, Defendant Christie commenced preparations for his quest for the 2016 US Presidency and required vast sums of money. Defendant Christie obtained this money through a multitude of ‘pay-to-play’ and kickback schemes, at the center of which lay the racket of ‘political campaign donations’, a tool of modern-day American politics that attempts to legitimize and provide cover for what are no more than bribes and a scheme that is one of political corruption.

101. From 2002 to 2012, Kaul developed one of the most successful solo minimally invasive spine surgery practices in the US, in large part as a consequence of his having invented in 2005, a procedure that revolutionized spine surgery, which proved that spinal fusions can be performed in a minimally invasive manner on an outpatient basis. In 2021 this procedure is the standard of care. With the clinical success of the practice, came immense economic success, and in 2009 Kaul obtained one of the last surgical center licenses in New Jersey, and was scheduled to commence construction in 2013.

102. From 2005 to 2012, Kaul had provided minimally invasive spine surgical services to numerous clients of Defendants CGLIC and **The Kaul Cases** Defendant Allstate, of which Defendant AQR, was and is a major corporate shareholder, and thus these Defendants owed Kaul and his professional corporations substantial amounts of money, which they/shareholders did not want to pay, as payment reduced executive compensation/share price.

103. Defendants CGLIC/AQR recognized that Kaul’s expanding minimally invasive spine surgery practice and the laudatory publicity surrounding it, in conjunction with the increasing number of physicians that Kaul was training, posed a threat to their executive/shareholder compensation.

104. Defendants CGLIC/AQR recognized that Kaul’s provision of minimally invasive spine surgery resulted in superior patient clinical outcomes, that exceeded those found in patients treated by the more aggressive/older ‘open’ techniques, that resulted in

massive amounts of blood loss, markedly increased rates post-operative infection (5-15%: Kaul's infection rate in 2011 = 0%) and permanent damage to muscles/ligaments/bone surrounding the spinal canal, that resulted in increased post-surgery pain and paralysis.

105. Defendants CGLIC/AQR have a controlling role in the American healthcare sector, from which they generate billion-dollar profits, through the collection of health insurance premiums, the purpose of which is to remunerate physicians for the provision of clinical care. Only 10% of every premium dollar is spent on providing clinical care, while the remainder is diverted into executive/shareholder compensation.

106. Defendants CGLIC/AQR sought to have Kaul eliminated from the practice of medicine because he posed a threat to their executive/shareholder compensation. However, Defendants CGLIC/AQR and their counsel recognized that there was no legitimate or legal basis on which to effectuate this injury on Kaul, an injury they recognized would be illegal.

107. In approximately 2010, Defendants CGLIC/AQR, in recognizing that there was no legal means of eliminating Kaul from medical practice, commenced devising a knowingly illegal scheme to achieve this end, a scheme that would involve an illegal conspiracy with the political/legal/judicial/medical elements of the State of New Jersey.

108. Defendants CGLIC/AQR recognized that by co-opting the State of New Jersey, their crimes would be afforded an ostensibly legitimate cover, purposed to deceive the public into believing that Kaul's elimination from medicine was legitimate/legal and to mitigate the threat of civil/criminal prosecution and thus insulate executive/shareholder profit from negative publicity and or litigation.

109. In recognition of the aforementioned facts, Defendants CGLIC/AQR, in collusion/conspiracy with Defendant Christie, converted the State of New Jersey into a **“racketeering enterprise”** through the perpetration of a prolonged **“pattern of racketeering”** that involved the commission of hundreds of RICO predicate acts of mail fraud/wire fraud/conspiracy/obstruction of justice/bribery/kickbacks, the purpose of which was to eliminate their debt to Kaul and to eliminate the threat of any future financial liability from Kaul's expanding minimally invasive spine surgery practice.

110. Defendant Christie, in recognition that he required vast sums of money to fund his political ambitions, abused his executive power over the State of New Jersey to have manufactured knowingly false cases that Kaul was not qualified to perform minimally invasive spine surgery and had committed medical malpractice.

111. Defendants CGLIC/AQR/Christie, recognized that these cases (revocation/judgments/articles) were illegal/fraudulent, but persisted in using the political/judicial/legal/medical bodies of the State of New Jersey to perpetrate a massive 'Fraud on the Court' and on the public, in furtherance of their political and economic agendas, and did so by converting the State of New Jersey into a **“racketeering**

enterprise”, at the center of which lay multiple schemes of judicial/political corruption, facilitated by the inherently corrupt system of so called ‘political campaign donations’.

112. In a period from July 21, 2014 to July 30, 2020 Defendant CGLIC engaged in a **“pattern of racketeering”** with **The Kaul Cases** Defendant, Daniel Stolz, Esq (Chapter 7 Trustee: 13-23366 - United States Bankruptcy Court for the District of New Jersey) to eliminate their debt to Kaul/his corporations/creditors, and converted the United States Bankruptcy Court for the District of New Jersey into a **“racketeering enterprise”** that furthered the Defendants illegal scheme to destroy Kaul’s economic standing/professional reputation. Defendant CGLIC and Stolz entered into secret deals facilitated by **The Kaul Cases** Defendant/Bankruptcy Judge, John Sherwood (Exhibit ---), the purpose of which was to conceal from public scrutiny their **“pattern of racketeering”** and judicial corruption.

113. The Defendants believed that by undermining Kaul’s position in the bankruptcy proceedings, it would undermine his position in every other proceeding in administrative/state/federal courts within the geographic boundaries of the State of New Jersey and would expedite the entry of judgments against him/his medical malpractice carrier. Orchestrating this grand scheme of corruption was Defendant Christie.

114. The Defendants organized themselves with the conviction that their prolonged pattern of criminal conduct under the cover of the political/legal/judicial/medical/media elements of state, would leave Kaul with no option but to leave the country, if they were unable to have him jailed, cause him to commit suicide or be caused to otherwise die. This conviction fostered an air of impunity, in which they knowingly/willfully violated all elements of RICO and with a surety, albeit false, that they and their crimes would never be subjected to civil/criminal investigation/prosecution. However, the Defendants believed that even if they were prosecuted, they had corrupted the judges in the United States District Court for the District of New Jersey-Newark, and Kaul would have no legal foundation on which to bring claims in any district other than New Jersey-Newark.

115. The Defendants, in their flagrant and knowing violation of the law, conspired with **The Kaul Cases** Defendants to ensure that every legal case brought against Kaul in any administrative/state/bankruptcy/federal court within the geographic boundaries of the State of New Jersey, resulted in a judgment against him, in order to provide further cover for their crimes and, at least in their minds, make it impossible for Kaul to expose their **“pattern of racketeering”**.

116. Defendant Christie, in collusion/conspiracy with the other Defendants in this case and **The Kaul Cases** Defendants, discussed the illegality of the scheme and the civil/criminal penalties that would ensue if they were prosecuted in a court over which the Defendants had neither corrupted nor had any influence. However, the Defendants persisted in the commission of crimes consequent to their conviction that Kaul would either be jailed/deported/die and that even if he were not, he would fall into a state of poverty and would thus not be able to initiate litigation, and that even if he did, he would not be able to sustain it to discovery, trial and judgment.

117. In a period until February 22, 2016 (K1 filing) Defendant Christie, in collusion/conspiracy with the other Defendants in this case and **The Kaul Cases** Defendants, did continue to have so called 'investigators' supposedly employed by the State of New Jersey, continue to harass and attempt to intimidate physicians that had worked with and for Kaul. One of these individuals, Dr. Luis Pacheco, informed Kaul in 2017, that up until early 2016, he had been subjected to approximately seven (7) visits, in which he was aggressively "**interrogated**" about any contact between himself and Kaul. Pacheco informed Kaul that the State was looking for evidence that Kaul was working as a doctor, in order to have him arrested and jailed, in a further effort to ensure that Kaul did not expose their criminal violations of RICO.

118. Defendant Christie + Defendant CGLIC:

Date Range: 2010 to 2017.

Conduits of Communication + Bribery to Christie: Public Relation/Political Lobbying Firms (Mercury Public Relations + Princeton Public Relations) + Law/Political Lobbying Firms (Brach Eichler + Wolf Samson + Wasserman Jurista Stolz) + Through state government intermediary + Directly + Political campaign fundraisers + Political campaign donations.

Mode of Communications: Email + Face-To-Face.

Substance of Communications: **(i)** Scheme to revoke Kaul's license. **(ii)** Scheme to destroy Kaul's reputation. **(iii)** Scheme to destroy Kaul's economic standing. **(iv)** Scheme to have Kaul ostracized. **(v)** Scheme to have Kaul leave the United States. **(vi)** Scheme to use the bankruptcy proceedings to defraud Kaul of his assets, his real estate holdings and \$ 45 million owed to him by insurance companies, including defendants Allstate + Geico. **(vii)** Scheme to conceal from Kaul the defendants' pattern of racketeering in the United States Bankruptcy Court for the District of New Jersey. **(viii)** Conspiracy to obstruct justice and have entered adverse rulings in all cases filed against Kaul in administrative/state/bankruptcy/federal courts within the geographic boundaries of New Jersey. **(viii)** Conspiracy to use the media to propagate the fraudulent judgments/rulings procured in these courts. **(ix)** Conspiracy to use the US mail and wires to disseminate these fraudulent judgments/rulings to every local/state/federal/international healthcare related agency, including the DEA, the National Practitioners Data Bank, every state medical board and every medical council in the world. **(x)** Conspiracy to prevent Kaul from ever finding any employment anywhere in the world, in order that he would never be able to expose the crimes of **The Kaul Cases** Defendants (in the period from April 2, 2012 to February 22, 2016, every time an article was published about one of the fraudulent cases, the journalist would ask a lawyer who had been associated with Kaul, whether he had left the country and if so, in what country was he residing - the purpose being to ascertain the likelihood that **The Kaul Cases** Defendants crimes would go undetected and to attempt to attack his position in that particular country.

Tactics Employed: **(i)** Use of US mail and wires to file false insurance fraud complaints against him with Defendant NJBME. **(ii)** Use of the US mail and wires to communicate false information to patients, that he was not qualified to perform minimally invasive spine surgery. **(iii)** Use of the US mail and wires to send false information to personal

injury lawyers that Kaul was not qualified to perform minimally invasive spine surgery and had committed insurance fraud. **(iv)** Use of the US mail and wires to send false information to New Jersey politicians, encouraging them, with the promise of political campaign 'donations' to coerce Defendant NJBME and the New Jersey Attorney General to have Kaul's license revoked **(v)** Use of the US mail and wires to organize and further schemes to bribe Defendant Christie, in order to have him order Defendant NJBME to revoke Kaul's license. **(vi)** Use of law and public relation firms to funnel bribes to Christie as part of quid pro quo schemes to revoke Kaul's license, destroy his reputation and cause him to leave the United States. **(vii)** Use of the US mail and wires to further scheme to have Kaul's license revoked by having Defendant Lomazow (works for the insurance industry) use his authority on Defendant NJBME to initiate an investigation against Kaul, in order to have his license revoked. **(viii)** Use of the US mail and wires to organize and further orders from Christie to revoke Kaul's license, in furtherance of quid pro quo schemes of bribery. **(ix)** Use of the US mails and wires to transmit written, telephone, or electronic communications regarding the knowingly fraudulent events surrounding the revocation of Kaul's license. **(x)** Use of the US mails and wires to transmit written, telephone, or electronic communications regarding discussions between the CHO RICO Association-In-Fact Defendants and state and federal politicians about the illegal scheme to revoke Kaul's license. **(xi)** Use of the US mails and wires to bill and collect the increased revenues that flowed from the illegal elimination of Kaul from the practice of medicine. **(xii)** Use of the US mails and wires to transmit information in furtherance of Christie's scheme to illegally have his attorney general and acting director of the division of consumer affairs have Defendant NJBME revoke Kaul's license. **(xiii)** Use of the US mails and wires to transmit information in furtherance of their scheme of converting the United States Bankruptcy Court into a racketeering enterprise. **(xiv)** Use of the US mails and wires to transmit false information that Kaul has committed insurance fraud, was not qualified to perform minimally invasive spine surgery, had committed bank fraud and was going to be criminally indicted for Medicare fraud + Obstruction of justice and evidence tampering ('The Solomon Critique' + 'The Solomon Critique 2'). **(xv)** Use of the US mail and wires to transmit the illegal consequences of the obstruction of justice and evidence tampering ('The Solomon Critique' + 'The Solomon Critique 2') to the public, national (state + federal) and international healthcare agencies and regulatory bodies, in furtherance of the defendants scheme to destroy Kaul's reputation globally, his livelihood, his economic standing and prevent him from obtaining a medical license anywhere in the world, or indeed any form of employment. **(xiv)** Use of the US mail and wires to attempt to have Kaul's medical school (Royal Free/UCL Medical School, London, UK) erase his degrees in medicine/surgery (M.B. B.S.).

Location: Governor's Office in Trenton + Christie/Republican Political Fundraisers + United States Bankruptcy Court for the District of New Jersey + Law Offices of Wasserman/Jurista/Stolz.

119. Defendant Christie + Defendant Allstate:

Date Range: See above. As with Defendant Christie + CGLIC.

Conduits of Communication + Bribery to Christie: See above. As with Defendant Christie + CGLIC.

Mode of Communications: See above. As with Defendant Christie + CGLIC.
Substance of Communications: See above. As with Defendant Christie + CGLIC.
Tactics Employed: See above. As with Defendant Christie + CGLIC.
Location: See above. As with Defendant Christie + CGLIC.

120. Defendant Christie + Defendant AQR:

Date Range: See above. As with Defendant Christie + CGLIC.
Conduits of Communication + Bribery to Christie: See above. As with Defendant Christie + CGLIC.
Mode of Communications: See above. As with Defendant Christie + CGLIC.
Substance of Communications: See above. As with Defendant Christie + CGLIC.
Tactics Employed: See above. As with Defendant Christie + CGLIC.
Location: See above. As with Defendant Christie + CGLIC.

121. Defendant CGLIC + Defendant AQR:

Date Range: See above. As with Defendant Christie + CGLIC
Mode of Communications: As with Defendant Christie + CGLIC.
Substance of Communications: As with Defendant Christie + CGLIC.
Tactics Employed: As with Defendant Christie + CGLIC.
Location: As with Defendant Christie + CGLIC.

RICO 3

**Enterprise – States New Jersey-Connecticut (“NJC-E”)
Defendant Persons - FSMB/CMB/Hafner
Pattern of Racketeering/RICO Predicate Acts - Mail
Fraud/Wire/Conspiracy/Obstruction of Justice/Bribery/Kickbacks**

Overview:

122. In a period commencing in approximately mid 2013 to late 2020, the Defendants did conduct a “**pattern of racketeering**” through, by and in conjunction with the “**NJC-E**” the purpose of which was to attempt to eliminate Kaul from the practice of medicine anywhere in the world/destroy his economic standing/destroy his reputation in order to eradicate the debt owed to Kaul by, amongst others, **The Kaul Cases** Defendants Allstate/Geico/CGLIC/AQR and to attempt to ensure that Kaul generated no future liability.

123. Defendant FSMB commands/controls/orchestrates and profits from a knowingly illegal collaboration of state medical boards, that violates the Commerce Clause of the United States Constitution. The FSMB: SMB (Federation of State Medical Boards: State Medical Boards) Scheme (“**F: SS**”) controls and exploits for profit the trillion-dollar industry of American medicine/physician regulation, in collusion/conspiracy with for-profit corporations involved in the healthcare sector.

124. The F: SS conducts its enterprise under the knowingly false guise that it “**protects the public**”, and is using an agreement entitled, the “**Interstate Agreement**” (so named to falsely convey legal legitimacy) to expand membership of state medical boards, in order to have Congress ratify the F: SS as the controlling authority in American medicine, in which all power is consolidated. The hospital/insurance/pharmaceutical industry (“**HIPI**”) politically supports the consolidation, as it streamlines their own axis of control of the healthcare sector, and thus maximizes their corporate/executive profit at the expense of the American public/medical profession.

125. HIPI and F: SS have, since at least 1986 (enactment of the Healthcare Quality Improvement Act), conducted massive schemes of bribery/kickbacks through a HIPI-F: SS Association-In-Fact Enterprise (“**HIPI-F: SS-AIF-E**”) that itself, as a “person” pursuant to RICO, has converted the executive/legislative/judicial branches of state/federal government into “**racketeering enterprises**”. These “**enterprises**” further the economic/political agenda of the HIPI-F: SS-AIF-E.

126. The true purpose of the “**Interstate Agreement**” is the furtherance of the F: SS, but the ‘front’ it provides is that it facilitates reciprocity of state licensure.

127. The Defendants, cognizant of the illegality of their scheme, did, in collusion/conspiracy with The Kaul Cases Defendants, conduct their crimes using the US mail and wires and did conspire to use as cover, the “**Interstate Agreement**” and the executive/federal/legislative branches of state/federal government.

128. Commencing in or around April 2012, Defendant Hafner used the US mail and wires to transmit a knowingly fraudulent legal instrument to state/federal/international healthcare regulatory/law enforcement agencies, that of the illegal suspension of Kaul’s license. The purpose of these crimes was to attempt to destroy Kaul and to co-opt these unwitting agencies into both obstructing any future efforts by Kaul to re-commence the practice of medicine and to validate/provide cover for their prior crimes (bribery/racketeering/public corruption) and for future crimes that they conspired to commit (obstruction of justice/perjury/evidence tampering/witness tampering/fraud/judicial corruption).

129. In a period from April 2012 to December 2020, Defendant Hafner, in collusion and conspiracy with, amongst others, Defendants FSMB/CMB sought to obstruct Kaul’s efforts to re-commence the practice of medicine by denying his October 2020 pre-application for licensure in the State of Connecticut, as part of an illegal scheme that Defendants FSMB/CMB/Hafner knew was a perpetuation of the massive ‘Fraud on the Court’ that resulted in the illegal revocation of Kaul’s NJ license on March 24, 2014.

130. Defendant CMB, despite having knowledge that the NJ administrative proceedings (April 9, 2013 to June 28, 2013) were conducted illegally, and that the revocation was illegal and thus had no legal validity, did aid and abet a continuation of

the “**pattern of racketeering**” (2010 to 2020) in which Defendant Hafner was a principal perpetrator of state orchestrated fraud.

132. Defendant FSMB + Defendant CMB:

Date range: 2012 to 2020.

Mode of communications: Email + US mail

Substance of communications: (i) Scheme to prevent Kaul from obtaining a license/livelihood anywhere in the United States, in order to suppress his ability to earn money, in order to mitigate the threat of exposure of the crimes of **The Kaul Cases** Defendants that the money would afford. (ii) Scheme to coerce Kaul into submitting himself to the knowingly illegal revocation/’fine’ (\$475,000) entered by Defendant NJBME on March 24, 2014, in order to attempt to have Kaul validate the crimes of **The Kaul Cases** Defendants and prevent him from exposing them. (iii) Scheme to coerce Kaul into submitting himself to the crimes of **The Kaul Cases** Defendants, by attempting to foreclose him from obtaining a license/livelihood anywhere in the United States, in order to protect the monopoly of the “**One Unit**” (FSMB/SMB) on the multi-billion-dollar business of physician licensing/regulation (The “**One Unit**” recognizes that its monopolistic power would be diminished if one of its member states undermines the authority/power of another state. The “**One Unit**” is a federalized cartel, whose member states have relinquished sovereign immunity and are not “**state actors**” but are for-profit “**private actors**” and or trade associations). (iv) Scheme to prevent Kaul from obtaining a license anywhere in the world, in recognition that if Kaul did (on February 8, 2021 **The Kaul Cases** Defendant, PMB, adopted in its entirety the May 27, 2020 opinion/order of the State of Pennsylvania that granted Kaul’s application for licensure), this fact, in conjunction with Kaul’s widely publicized cases, it would set precedent for dismantling the “**One Unit**” i.e., destroying the monopoly (the irony is that it was **The Kaul Cases** Defendants that provided Kaul a public platform from which **The Kaul Cases** have reached millions of people in medicine/law/political/healthcare business).

Tactics Employed: (i) Conspired to and did deny Kaul’s October 2020 pre-application for licensure in the State of Connecticut. (ii) Conspired to and did use the US mail/wires to transmit the knowingly illegal instrument of the NJ revocation (March 24, 2014) in an attempt to foreclose Kaul from either ever recommencing the practice of medicine, or only recommencing under onerous conditions (exclude the practice of minimally invasive spine surgery) and only after he had submitted himself to the illegal revocation/’fine’. The psychopathology found in those involved in The Spanish Inquisition/The English Star Chamber/The Salem Witch Hunts is the exact psychopathology found in physicians/lawyers/bureaucrats sitting on state medical boards, an example being **The Kaul Cases** Defendant, Steven Lomazow. (iii)

Location: Across the US mail/wires.

133. Defendant FSMB + Defendant Hafner:

See above. As with Defendant FSMB + Defendant CMB.

134. Defendant CMB + Defendant Hafner:

See above. As with Defendant FSMB + Defendant CMB.

RICO 4

**Enterprise - State of New Jersey-Connecticut (“NJC-E”)
Defendant Persons - Kaufman/Brown/Hafner
Pattern of Racketeering/RICO Predicate Acts - Mail
Fraud/Wire/Conspiracy/Obstruction of Justice/Bribery/Kickbacks**

Overview

135. In a period commencing in or around 2009, Defendants Kaufman/Brown/Hafner did conduct a **“pattern of racketeering”** consisting of the commission of hundreds of the RICO predicate acts of mail fraud/wire fraud/conspiracy/obstruction of justice/bribery/kickbacks, and did convert the State of New Jersey into a **“enterprise”**, the purpose of which was to: (i) have Kaul’s NJ license revoked; (ii) have entered multi-million dollar judgments by state courts; (iii) destroy Kaul’s reputation by using the media and the US mail and wires to propagate knowing falsehoods that Kaul was not qualified to perform minimally invasive spine surgery/had committed insurance fraud/had injured patients/was to be indicted by the federal government/had illegally performed minimally invasive spine surgery in his Pompton Lakes Surgical Center.

136. The Defendants, cognizant of the illegality of their actions, did nonetheless perpetrate these crimes in furtherance of both their political/economic agendas and those of their co-conspirators and **The Kaul Cases** Defendants, all of whom believed that their crimes would go undetected under the cover of the state government/state courts/medical board/insurance industry.

137. The Defendants did knowingly and with malice/forethought use fundamental elements of state to perpetrate their massive criminal scheme, a scheme that they knew would subject them to criminal indictments if exposed. The Defendants, though their extensive network of NJ lawyers/judges/physicians/insurance executives did use the US mail and wires to further their commission of the crime of ‘Fraud on the Court’ within the executive/legislative/judicial branches of the State of New Jersey and that of the United States.

138. The Defendants, in collusion/conspiracy with **The Kaul Cases** Defendants, did use the US mail and wires to transmit a knowingly fraudulent legal instrument, that of the revocation, to foreign medical boards/councils. The purpose of this international dissemination was to attempt to prevent Kaul from re-commencing clinical medicine, an occurrence the Defendants recognized would re-establish Kaul’s livelihood and increase the likelihood that their crimes would be exposed.

139. On multiple occasions during the hearing in the NJ OAL (April 9 to June 28, 2013), a proceeding presided over by **The Kaul Cases** Defendant, Jay Howard Solomon, Esq, Defendant Brown appeared in the audience.

140. During the aforementioned hearing, a series of Kaul's business competitors (Kenneth Rieger-orthopedic-affiliated with hospital/George Naseef-orthopedic-affiliated with hospital/Arash Emami-orthopedic-affiliated with hospital/Alfred Steinberger-neurosurgeon-affiliated with hospital), testified for Defendant Hafner.

141. Defendant Kaufman engaged in healthcare business with these business competitors of Kaul and was affiliated with the same hospitals as these individuals. These hospitals also competed with Kaul for business in the minimally invasive spine surgery sector in New Jersey.

142. Defendants Hafner/Kaufman, in furtherance of their scheme to attempt destroy Kaul, caused Defendant Brown to become associated with Rieger/Naseef/Emami/Steinberger, in order to have them provide testimony against Kaul in the frivolous medical malpractice claims filed by Defendant Brown, on behalf of patients that Defendant Hafner recruited through a prolonged campaign of manipulation, deceit and lies.

143. In late 2013, after Defendant Kaufman and **The Kaul Cases** Defendant, Przybylski, had been exposed on cross examination as perjurers in the hearing in the NJ OAL (April 9 to June 28, 2013), they both withdrew from medical malpractice cases in which they had provided knowingly false 'expert' testimony against Kaul, that he was not qualified to perform minimally invasive spine surgery and had allegedly deviated from the standard of care. The patients on whom these individuals testified had all improved after the care they received from Kaul, as is evident from their clinical notes.

144. All of the patients on whom the State of New Jersey based their case to revoke Kaul's license either improved or had accepted outcomes, as determined by all medical literature. From 2002 to 2012 Kaul performed eight hundred (800) minimally invasive spine surgeries with good to very good outcomes in 90-95% of cases (average is 65-70%) and a complication rate of 0.1% (average is 5-15%).

145. Defendants Kaufman/Brown/Hafner, in collusion/conspiracy with **The Kaul Cases** Defendants, recruited and then funneled patients into the malpractice racket being orchestrated by **The Kaul Cases** Defendant, Christie. This individual received kickbacks from Defendant Brown and a multitude of other NJ personal injury lawyers, as part of a series of quid pro quo schemes, in which he abused the power of public office to commit judicial corruption/obstruct justice/cause the entry of multi-million-dollar judgments against Kaul and his malpractice carrier.

146. Defendant Kaufman + Defendant Brown

Date range: 2012 to 2018.

Mode of communications: Email + Voice Message + SMS + Face-To-Face

Substance of communications: (i) Scheme to encourage patients to initiate civil litigation and medical board complaints against Kaul and similarly trained physicians. (ii) Scheme to obstruct justice by corrupting NJ state court judges into entering fraudulent judgments against Kaul and his medical malpractice carriers. (iii) Scheme to participate in sham

litigation against Kaul. **(iv)** Scheme to participate in sham litigation against Kaul's physician employees. **(v)** Scheme to use the NJ state court system to propagate the knowingly fraudulent arguments submitted by Defendants Hafner/Kaufman and co-conspirator, Gregory Przybylski, in the administrative board proceedings (April 9 to June 28, 2013). **(vi)** Scheme to use the NJ state court system to propagate the knowingly illegal opinion issued on December 13, 2013, by co-conspirator/administrative law judge, Jay Howard Solomon.

Tactics Employed: **(i)** Conspired to and did participate in sham litigation and provided knowingly false testimony that caused the entry of multi-million-dollar judgments against Kaul and his medical malpractice carrier. **(ii)** Conspired to and did cause the filing/publication of these false judgments with the National Practitioners Data Bank, co-conspirator, State of New Jersey, and in collusion with media co-conspirators, North Jersey Media Group/www.nj.com, into the public domain and onto the internet. **(iii)** Conspired to and did provide knowingly false testimony under oath that the care Kaul delivered to his patients "grossly deviated" from the standard of care because Kaul did not possess alternative privileges/hospital privileges and did not participate in an orthopedic/neurosurgical residency. **(iv)** Conspired to and did participate in sham litigation against Kaul's physician employees, falsely testifying that they were not qualified to perform minimally invasive spine surgery and had committed insurance fraud. **(v)** Conspired to and did participate in sham litigation purposed to professionally ostracize Kaul, cause him to leave the United States and prevent him from publicly exposing the Defendants crimes. **(vi)** Use of the US mail and wires to defraud patients of their right to honest services by communicating knowingly false information that Kaul was not qualified to perform minimally invasive spine surgery. **(vii)** Conspire and collude with the legal/political apparatus of the State of New Jersey to perpetrate a knowingly illegal scheme to defraud Kaul, his medical malpractice carrier and the public of their property, their right to honest services and medical care. **(viii)** Conspire and collude to deprive Kaul of his constitutionally protected right to an impartial tribunal in proceedings, the outcomes of which resulted in the loss of his livelihood, property and liberty. **(ix)** Conspire to propagate and propagate within the New Jersey Superior Court system, the December 13, 2013 opinion of The Kaul Cases Defendant/co-conspirator, Jay Howard Solomon (NJ OAL Judge), a knowingly fraudulent legal instrument, the product of a massive 'Fraud on the Court' (revocation) committed by The Kaul Cases Defendants. **(x)** Conspire to use and use the US mail and wires to transmit a knowingly fraudulent legal instrument in furtherance of the scheme to defraud Kaul/his malpractice carrier of their property. **(xi)** Conspire with judges in the New Jersey Superior Court system to use its legal apparatus to perpetuate the fraud committed in the NJ OAL, to defraud the public of its right to honest services through the commission of schemes of judicial corruption and to fraudulently obtain multi-million-dollar judgments from Kaul's malpractice carrier. **(xii)** Conspire with judges in the NJ Superior Court system to manufacture knowingly fraudulent legal judgments in an attempt to provide further legal cover for the crimes (2006 to 2018) committed by The Kaul Cases Defendants in administrative/state/bankruptcy/federal courts within the geographic boundaries of co-conspirator, State of New Jersey. **(xiii)** Conspire to propagate and propagate the knowingly false arguments submitted by The Kaul Cases Defendants, Kaufman/Przybylski/Hafner, in the administrative hearing (April 9 to June 28, 2013), by

using the US mail/wires and the politico-legal apparatus of the State of New Jersey.

(xiv) Conspire to provide kickbacks and provide kickbacks to The Kaul Cases Defendant Christie as part of a quid pro quo scheme, in which Defendant Christie abused the power of the state to have Kaul's license illegally revoked, have the event widely publicized for almost four (4) years, order courts within the geographic boundaries of New Jersey to deny/obstruct Kaul's defenses, expedite the entry of illegal judgments against Kaul/his medical malpractice carrier, have his AG continue to recruit/encourage Kaul's patients to sue him and order the entire politico-legal apparatus of the State of New Jersey to not provide Kaul with medical expert or legal assistance in his defense of the cases.

Location: Across the US mail and wires + Law Firm of Lomurro Law + NJ State Superior Court.

147. Defendant Kaufman + Defendant Hafner

Date range: 2009 to 2021.

Mode of communications: Email + Voice Message + SMS + Face-To-Face

Substance of communications: **(i)** Scheme to encourage patients to initiate civil litigation and medical board complaints against Kaul and similarly trained physicians. **(ii)** Scheme to obstruct justice by corrupting NJ state court judges into entering fraudulent judgments against Kaul and his medical malpractice carriers. **(iii)** Scheme to participate in sham litigation against Kaul. **(iv)** Scheme to participate in sham litigation against Kaul's physician employees. **(v)** Scheme to use the NJ state court system to propagate the knowingly fraudulent arguments submitted by Defendants Hafner/Kaufman and co-conspirator, Gregory Przybylski, in the administrative board proceedings (April 9 to June 28, 2013). **(vi)** Scheme to use the NJ state court system to propagate the knowingly illegal opinion issued on December 13, 2013, by co-conspirator/administrative law judge, Jay Howard Solomon. **(vii)** Scheme to corrupt judges in the United States District Court-District of New Jersey-Newark to obstruct justice and Kaul's prosecution of **The Kaul Cases**, in order to attempt to prevent Kaul from exposing the crimes of **The Kaul Cases** Defendants (2006 to 2021). **(viii)** Scheme to use the US mail/wires to attempt to destroy evidence of the crimes by coercing/co-opting/conspiring with co-conspirators/third-party witnesses to attempt to delete emails/texts/voice messages that are either incriminating/have any relation to Kaul.

Tactics Employed: **(i)** Conspired to and did participate in sham litigation and provided knowingly false testimony that caused the entry of multi-million-dollar judgments against Kaul and his medical malpractice carrier. **(ii)** Conspired to and did cause the filing/publication of these false judgments with the National Practitioners Data Bank, co-conspirator, State of New Jersey, and in collusion with media co-conspirators, North Jersey Media Group/www.nj.com, into the public domain and onto the internet. **(iii)** Conspired to and did provide knowingly false testimony under oath that the care Kaul delivered to his patients "grossly deviated" from the standard of care because Kaul did not possess alternative privileges/hospital privileges and did not participate in an orthopedic/neurosurgical residency. **(iv)** Conspired to and did participate in sham litigation against Kaul's physician employees, falsely testifying that they were not qualified to perform minimally invasive spine surgery and had committed insurance fraud. **(v)** Conspired to and did participate in sham litigation purposed to professionally

ostracize Kaul, cause him to leave the United States and prevent him from publicly exposing the Defendants crimes. **(vi)** Use of the US mail and wires to defraud patients of their right to honest services by communicating knowingly false information that Kaul was not qualified to perform minimally invasive spine surgery. **(vii)** Conspire and collude with the legal/political apparatus of the State of New Jersey to perpetrate a knowingly illegal scheme to defraud Kaul, his medical malpractice carrier and the public of their property, their right to honest services and medical care. **(viii)** Conspire and collude to deprive Kaul of his constitutionally protected right to an impartial tribunal in proceedings, the outcomes of which resulted in the loss of his livelihood, property and liberty. **(ix)** Conspire to propagate and propagate within the New Jersey Superior Court system, the December 13, 2013 opinion of **The Kaul Cases** Defendant/co-conspirator, Jay Howard Solomon (NJ OAL Judge), a knowingly fraudulent legal instrument, the product of a massive 'Fraud on the Court' (revocation) committed by **The Kaul Cases** Defendants. **(x)** Conspire to use and use the US mail and wires to transmit a knowingly fraudulent legal instrument in furtherance of the scheme to defraud Kaul/his malpractice carrier of their property. **(xi)** Conspire with judges in the New Jersey Superior Court system to use its legal apparatus to perpetuate the fraud committed in the NJ OAL, to defraud the public of its right to honest services through the commission of schemes of judicial corruption and to fraudulently obtain multi-million-dollar judgments from Kaul's malpractice carrier. **(xii)** Conspire with judges in the NJ Superior Court system to manufacture knowingly fraudulent legal judgments in an attempt to provide further legal cover for the crimes (2006 to 2018) committed by **The Kaul Cases** Defendants in administrative/state/bankruptcy/federal courts within the geographic boundaries of co-conspirator, State of New Jersey. **(xiii)** Conspire to propagate and propagate the knowingly false arguments submitted by **The Kaul Cases** Defendants, Kaufman/Przybylski/Hafner, in the administrative hearing (April 9 to June 28, 2013), by using the US mail/wires and the politico-legal apparatus of the State of New Jersey. **(xiv)** Conspire to provide kickbacks and provide kickbacks to **The Kaul Cases Defendant** Christie as part of a quid pro quo scheme, in which Defendant Christie abused the power of the state to have Kaul's license illegally revoked, have the event widely publicized for almost four (4) years, order courts within the geographic boundaries of New Jersey to deny/obstruct Kaul's defenses, expedite the entry of illegal judgments against Kaul/his medical malpractice carrier, have his AG continue to recruit/encourage Kaul's patients to sue him and order the entire politico-legal apparatus of the State of New Jersey to not provide Kaul with medical expert or legal assistance in his defense of the cases. **(xv)** Conspire to destroy/tamper with evidence/witnesses and actually attempt to destroy/tamper with evidence/witnesses, in an attempt to obstruct justice and Kaul's prosecution of **The Kaul Cases**.
Location: Across the US mail and wires + Law Firm of Lomurro Law + NJ State Superior Court + Office of the NJ AG.

148. Defendant Brown + Defendant Hafner

See above. As with Defendant Kaufman + Defendant Hafner.

Antitrust/RICO

**Enterprise - State of New Jersey-Connecticut ("NJC-E")
Defendant Persons - Kaufman/Christie/AQR
Pattern of Racketeering/RICO Predicate Acts - Mail
Fraud/Wire/Conspiracy/Obstruction of Justice/Bribery/Kickbacks**

Overview:

149. In a period commencing in or around 2009, the Defendants did conspire to commit and did commit knowing and malicious violations of antitrust law, the purpose of which was to further their political/economic agendas. The antitrust scheme consisted of boycotts/vertical agreements/horizontal agreements, per se violations of relevant state/federal law.

Market Power:

150. The two factors that explain why and how there exists constitutionally excessive power over the healthcare sector within the Office of the NJ Governor are: **(i)** the unconstitutional configuration of the mechanism of physician regulation; **(ii)** a system of so called 'political campaign donations' that is nothing more than a scheme of public corruption. The coalescing of these two factors with an abuse of political power for political/economic/personal gain accounts for the violations of antitrust law orchestrated by Defendant Christie in collusion/conspiracy with The Kaul Cases Defendants in a period commencing in 2006. For profit healthcare corporations (insurance/hospital/pharmaceutical/medical device) purchase power in the New Jersey healthcare market, through the purchasing of the executive/legislative/judicial branches of the state, a power that they then use to illegally eliminate competition through the commission of per se antitrust violations, the purpose of which is to monopolize the market to the grave/lethal detriment of the public. The injury to the public consists of reduced access to healthcare/increased cost/increased morbidity/increased mortality. The latter two injuries are evidenced in the devastating impact that COVID-19 had on the American public (there is a direct correlation between COVID-19 deaths and corruption in healthcare systems) and in the human catastrophe that is the so called "**opiate epidemic**". K2/K5/K7 Defendant, NJBME, justifies its existence by claiming that it "**protects the public**". This is a false claim, as it actually harms the public, in that it is nothing more than an anticompetitive "**racketeering**" weapon, used by politicians/judges/lawyers corrupted by for-profit healthcare corporations, who profit at the expense of human life and who have bribed their way into practicing medicine without a license.

151. The regulatory mechanism of physician regulation in New Jersey is illegal and exists in violation of the due process/impartial tribunal clauses of both Constitutions of the State and that of the United States. The three agencies involved in the process, AG/NJBME/OAL, are all under control of the executive branch of government, and the executive from 2009 to 2017 was Defendant Christie. K2/K5/K7 Defendant NJBME

remains in violation of the law promulgated in 2015 by the Supreme Court of the United States in North Carolina Dental Board v FTC, and thus it nor its members have any immunity.

Foreclosure from the American/Global Healthcare Market:

152. **The Kaul Cases** Defendants “**pattern of racketeering**” and per se antitrust violations (2006 to 2021) constitute violations of the law to a criminal standard, in that they conspired to commit and did commit the felonies of mail fraud/wire fraud/perjury/obstruction of justice/bribery/kickbacks that resulted in the illegal revocation (March 24, 2014) of Kaul’s NJ license, its international dissemination using the US mail/wires to foreclose Kaul not just from the American healthcare market, but from that of the world, thus causing antitrust and “**racketeering**” injuries to the world healthcare market. Kaul was planning to further expand his global minimally invasive spine surgery business, when his license was illegally suspended/revoked, and his reputation maliciously destroyed by **The Kaul Cases** Defendants.

153. **The Kaul Cases** Defendants antitrust/racketeering crimes defrauded Kaul of almost a decade of his professional life or approximately twenty-five percent (25%), the equivalent or worse of being wrongly incarcerated for a decade of one’s most productive years.

154. The Defendants in the conception/development/execution of their knowingly illegal antitrust scheme to restrict competition in the American minimally invasive spine surgery market, did recognize that their malicious manipulation of the market would cause immense mortality/morbidity to the American public.

155. The Defendants manipulation of the minimally invasive spine surgery market has contributed to the so called “**opiate epidemic**”, in that because it artificially reduced the availability of pain-relieving spine surgical services, patients were forced to resort to opiates for control of their pain.

156. However, the insurance industry, of which **The Kaul Cases** Defendants, Allstate/Geico are members, and from which Defendant AQR profits, has continued to restrict the pain market by using state/federal investigative/regulatory/prosecutorial authorities to eliminate physicians who treat pain, by having their licenses suspended/revoked and or incarcerated. The Defendants recognize that less healthcare is delivered if there are fewer physicians/patients and if regulatory obstacles/prosecutorial threats are levied. These manipulations cause artificially elevated profits, that are not a consequence of a superior service, but of a “**pattern of racketeering**” purposed to cause an antitrust injury and all its attendant consequences.

157. The Defendants were motivated to restrict the market, as they knew that a greater percentage of the public’s auto and health insurance premiums would be diverted to them, in the form of increased political campaign donations/increased

executive compensation/increased share value/increased revenue from medical professional services.

158. In approximately 2009, the Defendants, in collusion/conspiracy with **The Kaul Cases** Defendants, perpetrated an insurance/hospital industry scheme of bribery/public corruption/judicial corruption through the executive/legislative/judicial branches of the NJ state government. In the scheme, sham legislation was enacted to artificially restrict the performance of interventional pain/minimally invasive spine surgery in outpatient surgical centers, in order to divert this healthcare business into hospitals and to those physicians associated/employed with hospitals, for the purposes of assuming monopoly control.

159. The insurance-hospital industries, in conspiring to manipulate and manipulating the minimally invasive spine surgery market, did recognize that both would illegally profit as spine care would be rendered less available due to its restriction/rationing to hospitals and thus the insurance industry, from which AQR profits, would report greater profits, that they knew, however, would be at the cost of human life. The restricted market was disproportionately/artificially/illegally directed to the hospital industry.

160. The Defendants conducted their knowingly illegal antitrust scheme under the cover of the State of New Jersey, while using the US mail/wires to perpetrate a knowing falsehood that Kaul was performing minimally invasive spine surgery in a “**one-room**” surgical center, that of the NJSR Surgical Center. It is a four-thousand square foot (4,000) state-of-the-art Medicare certified, AAAHC accredited surgical center, in which Kaul had been credentialed to perform minimally invasive spine surgery, through a process that involved both the federal government and that of the State of New Jersey. The space consisted of: (i) patient reception; (ii) administrative office; (iii) staff kitchen; (iv) patient intake/clinical assessment area; (v) elevator to the second; (vi) steps to the second floor; (vii) second floor-patient bathroom; (viii) second floor-Class C Operating Room; (ix) preoperative patient area; (x) postoperative patient area. The “**one-room**” lie was a further attempt by the Defendants to provide cover/justification for their crimes and those of **The Kaul Cases** Defendants.

161. The Defendants scheme of premeditated antitrust violations were intended to economically harm Kaul/other minimally invasive spine surgeons/free standing surgical centers, while causing the neurosurgeons/orthopedic spine surgeons/hospitals-affiliated surgical centers/insurance industry to profit. The latter group, as with the insurance industry had engaged in massive/prolonged schemes of public corruption, partly under the guise of so called ‘political campaign’ donations.

162. The Defendants antitrust scheme involved conspiracies with, amongst others: (i) patients to sue Kaul; (ii) spine device representatives to not supply Kaul with surgical product as part of a group boycott; (iii) patients to file complaints with K1/K2/K5/K7 Defendant NJBME to have Kaul’s license revoked; (iv) personal injury lawyers, such as Defendant Brown, to file medical malpractice lawsuits; (v) state court judges to enter multi-million dollar judgments against Kaul; (vi) K2/K5 Defendant/NJ OAL Judge, Jay

Howard Solomon, to revoke Kaul's license (March 24, 2014); **(vii)** lawyers to not provide Kaul with legal assistance; **(viii)** judges in the United States Bankruptcy Court for the District of New Jersey to obstruct justice as detailed in K4; **(ix)** judges in the United States District Court for the District of New Jersey to obstruct justice as detailed in K11-3; **(x)** Federation of State Medical Boards/State Medical Boards to attempt to obstruct Kaul from obtaining a license in the United States; **(xi)** patients to stop treating with Kaul; **(xii)** other physicians to not refer patients to Kaul for minimally invasive spine surgery.

163. The Defendants antitrust scheme/conspiracy was massive and extended into all elements of society: **(i)** NJ state/local/municipal government; **(ii)** NJ Supreme Court/Appellate Court/Superior Court/OAL/NJBME/Office of the AG/NJ State Bar; **(iii)** NJ Legislature. In 2015 Loretta Weinberg, a NJ career politician, sought to have enacted a bill regarding foreign convictions, that Defendant Christie/State AG considered applying retroactively to Kaul, despite the fact that they knew the UK case was a political prosecution, that had no legal equivalent in the US.

164. The Defendants, in the commission of their knowingly per se antitrust violations, did orchestrate/participate/aid/abet a series of administrative hearings (April 2, 2012 to March 24, 2014) that were conducted illegally, in which there were two hundred and seventy-eight (278) separate instances of perjury/evidential falsification/witness tampering/evidential omission, that resulted in, amongst other things: **(i)** the illegal revocation of Kaul's license (March 24, 2014); **(ii)** the imposition of a knowingly illegal 'fine' of \$475,000; **(iii)** the entry of multi-million dollar state court judgments against Kaul/his malpractice carrier; **(iv)** the exclusion from the national minimally invasive spine surgery market of well qualified physicians who became fearful of losing their licenses/livelihoods; **(v)** an intentional injury to the minimally invasive spine surgery market.

165. The Defendants, in collusion/conspiracy with **The Kaul Cases** Defendants, conspired to and did monopolize (2006 to 2021) the minimally invasive spine surgery market, a consequence of which has been a reduced availability of the service and an increase in cost to the public, in the form of elevated insurance deductibles and copays.

Conspiracy-Antitrust-RICO:

166. In a period that commenced in 2006, the Defendants and their co-conspirators, cognizant of the law, did conspire to violate and did violate, the provisions of RICO/Sherman-Clayton Acts. The scheme to eliminate Kaul initially involved rule of reason antitrust violations (2006), but rapidly progressed to per se violations when the former failed to complete its mission. However, despite the Defendants commission of per se violations, in collusion/conspiracy with the power of the executive/legislative/judicial branches of state government, they still were unable to complete their mission. In 2009, the Defendants with Defendant Christie at the helm, incorporated "**racketeering**" into their Kaul elimination scheme, but despite destroying his economic standing/professional reputation remained unable to have him

jailed/deported/killed and thus eliminated. By 2012/2013 the Defendants scheme had co-opted the NJ FBI field office/US Attorney (Paul Fishman) and every healthcare related agency/law enforcement bureau in the United States. But still, the Defendants failed to complete their mission. From 2012 to 2016, the Defendants/co-conspirators, in collusion/conspiracy with administrative/state/bankruptcy courts/judges within the geographic boundaries of the State of New Jersey continued to have entered knowingly illegal multi-million-dollar judgments entered against Kaul/his malpractice carrier. In this period, the Defendants conspired with **The Kaul Cases** Defendant, NJBME, to obstruct Kaul's 2014 application for license reinstatement, an act consistent with their guilty state-of-mind. The Defendants continued to disseminate every judgment against Kaul to every state/federal healthcare related/regulatory agency in the United States and across the media, as part of their Kaul elimination scheme. From 2013 to 2020, the Defendants/co-conspirators continued their crimes in the United States Bankruptcy Court for the District of New Jersey, causing immense injury to the businesses of hundreds of Kaul's creditors, many of whom were forced to file for bankruptcy, with hundreds of job losses. From 2016 to the present, the Defendants have continued their crimes in the United States District Court for the District of New Jersey/District of Columbia through their ongoing schemes of judicial corruption/public corruption/racketeering/antitrust violations, in an increasingly futile attempt to provide cover for their previous crimes, while continuing to fail to eliminate Kaul. In this period the Defendants continued to conspire with the Defendant federal/bankruptcy judges in the DNJ, to have entered orders that attempt to prevent Kaul from prosecuting them (2020) and or absolve them of their legal obligation to respond to claims filed against them by Kaul in other districts (2021). **The Kaul Cases** Defendants have been given enough rope, at the end of which they now find themselves. What began in 2005 with professional jealousy over Kaul inventing and performing the first minimally invasive outpatient spinal fusion, is in 2021, a scenario that will result in the incarceration of certain Defendants and a confiscation/lien by Kaul of all of their assets/future earnings.

167. The antitrust claim is intertwined with a RICO claim, as the Defendants antitrust violations were the factual foundation from which the RICO predicate acts were then incorporated into the overall criminal scheme, a scheme that failed to eliminate Kaul, or as stated by Kaul's then-lawyer, Robert Conroy, on June 13, 2012 during a corrupted hearing in Trenton, NJ, in front of Defendant NJBME, to illegally rescind a consent agreement (signed May 9, 2012) into which Kaul had entered with the State of NJ:

“Is his [Kaul] mere existence a risk?”

168. Conroy's question, maybe not unwittingly, pointed to the Defendants Kaul elimination scheme.

169. Thus, plausibly pled within this hybrid claim, are facts that satisfy to the prevailing pleading standards of Rule 8/9 and Twombly/Iqbal the elements of RICO.

170. In a period commencing in approximately 2009, the Defendants did conspire to conduct and did conduct a **“pattern of racketeering”** through the knowingly illegal

commission of hundreds of the RICO predicate acts of mail fraud/wire fraud/conspiracy/obstruction of justice/bribery/kickbacks in furtherance of both their political/economic agendas and those of their co-conspirators and **The Kaul Cases** Defendants. The purpose of these crimes was to have Kaul's license revoked/have entered multi-million-dollar state court judgments/destroy his reputation, the latter an attempt to prevent him from re-establishing his livelihood and exposing the Defendants' crimes and those of **The Kaul Cases** Defendants.

171. Defendants Christie/AQR did use the US mail and wires in furtherance of the afore-stated racket, as well as face-to-face meetings through which they conducted knowingly illegal quid pro quo schemes that involved the executive/legislative/judicial branches of the State of New Jersey, the NJBME, the NJ AG, the NJ OAL and the NJ State Court system.

172. The Defendants, cognizant of their conversion of the State of New Jersey into a racketeering "**enterprise**" and in full knowledge of its illegality, did recognize that the perpetration of their crimes required the knowing collaboration/conspiracy of a multitude of prominent judges/legal/political/medical/media/insurance/hospital executives and professionals. This list of co-conspirators/collaborators, a number of whom are Defendants within **The Kaul Cases** includes, but is not limited to: **(i)** Defendant Richard Crist; **(ii)** Defendant Jay Howard Solomon (K2/K5-state court judge) **(iii)** Defendant Kenneth Grispin (P2-state court judge); **(iv)** Defendant Jose Linares (K11-3-federal court judge); **(v)** Defendant Stewart Levis, Esq (K11-3-lawyer for Defendants William Mitchell, MD/Marc Cohen, MD); **(vi)** Defendant John Robertelli, Esq (K11-1-lawyer for Defendant Geico); **(vii)** Defendant Steven Sweeney (K11-1-NJ Senate President); **(viii)** Defendant Cory Booker (K11-1-US Senator-NJ); **(ix)** Defendant Gregory Przybylski, MD (K1/K2/K5-2011 President of the North American Spine Society-neurosurgeon); **(x)** Defendant Peter Carmel, MD (K1-2011 President of the AMA-neurosurgeon); **(xi)** Defendant Warren Buffet (K1-CEO Berkshire Hathaway); **(xii)** Defendant Robert Garrett (K1/K2/K5-CEO of Defendant Hackensack University Medical Center); **(xiii)** Gannett Media.

173. Defendants Kaufman/Christie/AQR, in the conception/planning/execution of their crimes, did recognize that their corrupt use of the Office of the NJ AG/NJBME/NJ-OAL/NJ-State Court, although knowingly illegal, would provide massive cover for their massive crimes.

174. Defendants Kaufman/Christie/AQR, in the belief/conviction that Kaul would never expose their crimes, did knowingly and with malice/impunity violate RICO, in their pursuit of profit and political gain, but with the knowledge that if their crimes came to the attention of state/federal/international investigative/prosecutorial authorities, they would be incarcerated for a lengthy term in a domestic/foreign penitentiary.

175. Defendants Kaufman/Christie/AQR were convinced that their crimes would go undetected because they were sure Defendant Christie would become the 45th President of the United States, and that immunity would prevent Kaul from prosecuting

the President, and that without Christie as a Defendant, Kaul would be unable to prove his case. These beliefs were false, but their existence is evidence that **The Kaul Cases** Defendants believe they are above the law, or as Defendant Hafner (K2/K5-NJ Deputy AG) is prone to 'parroting' about innocent physicians whose lives she destroys: **"Dr. X believes he can thumb his nose at the law ... Dr. X doesn't get to write the rules."**

176. Defendant AQR, in its capacity as a major corporate shareholder in Defendant Allstate, did simultaneously conduct a **"pattern of racketeering"** as detailed above, while aiding and abetting Defendant Allstate's (K1/K2/K3/K5/K7/P1/P2) decades-long **"pattern of racketeering"** (mail fraud/wire fraud/subornation of perjury/obstruction of justice/bribery) through, by and with the **"enterprise"** of The State of New Jersey, through the exploitation of the health/economic welfare of the American public/medical profession.

177. Pursuant to RICO/doctrines of vicarious liability, Defendant AQR is liable for the crimes of Defendant Allstate, and Defendant Allstate is liable for the crimes of Defendant AQR.

178. Defendant Kaufman + Defendant Christie

Date range: 2010 to 2017.

Conduits of Communication + Bribery to Christie:

Through state government intermediaries.

Mode of communications: Email + Voice Message + SMS + Face-To-Face

Substance of communications:

(i) Scheme to encourage patients to initiate civil litigation and medical board complaints against Kaul and similarly trained physicians. (ii) Scheme to obstruct justice by abusing the power of political/public office to corrupt NJ state court judges into entering fraudulent judgments against Kaul and his medical malpractice carriers. (iii) Scheme to file complaints against Kaul with state and federal regulatory authorities. (iv) Scheme to participate in sham litigation against Kaul. (v) Scheme to participate in sham litigation against Kaul's physician employees. (vi) Scheme to revoke Kaul's license. (vii) Scheme to destroy Kaul's reputation. (viii) Scheme to destroy Kaul's economic standing. (ix) Scheme to have Kaul ostracized. (x) Scheme to have Kaul leave the United States. (xi) Scheme to have co-conspirator and NJ Administrative Law Judges, Jay Howard Solomon buttress co-conspirator, Gregory Przybylski's knowingly false testimony that every aspect of the care Kaul delivered to his patients "grossly deviated" from the standard of care. (xii) Scheme to have Defendant Hafner pervert the course of justice by buttressing Defendant Przybylski's knowingly false testimony that every aspect of the care Kaul delivered to his patients "grossly deviated" from the standard of care. (xiii) Scheme to engage in evidence tampering and perjury in the administrative board proceedings, that caused the revocation of Kaul's license, as evidenced in 'The Solomon Critique' (K1-D.E. 225 Page ID 4940) and 'The Solomon Critique 2' (K1-D.E. 299 Page ID 7202). (xiv) Scheme to violate Kaul's right to due process, his right to an impartial tribunal and his civil rights, through the commission of knowingly false testimony that Kaul had allegedly "grossly deviated" from the standard of care for

reasons pertaining to qualifications, credentials, alternative privileges and hospital privileges. Defendant Hafner knew that under the law the standard of care is not determined by any of these reasons, but simply by the manner in which the care is delivered, but yet in this knowledge she abused the power of public office for personal and political gain, at the expense of the public. **(xv)** Scheme to abuse the power of public office and quasi-judicial proceedings to perpetrate a massive fraud on the public, by willfully misrepresenting that Kaul was not qualified, credentialed or licensed to perform minimally invasive spine surgery. The defendants knew that Kaul possessed a license to practice medicine and surgery, had been credentialed by at least six state licensed surgical centers to perform minimally invasive spine surgery, did not require alternative or hospital privileges to perform minimally invasive spine surgery, had commenced his training in minimally invasive spine surgery in 2002, three years before co-conspirator Gregory Przybylski, a market competitor and 'expert' for Defendant NJBME. **(xvi)** Scheme to propagate to the public, a knowingly false interpretation of the alternative privilege regulation, in the knowledge that they were abusing the power of public office for personal and political gain. The defendants knew that Kaul did not require alternative privileges to perform minimally invasive spine surgery in his outpatient surgical center. **(xvii)** Scheme to suppress evidence of the superior clinical outcomes of Kaul's minimally invasive spine surgery practice, by refusing to have Kaul's practice independently analyzed and monitored. **(xviii)** Scheme to engage in obstruction of justice by ignoring Kaul's written requests for an independent investigation of Kaul's claims of evidence tampering. **(xix)** Scheme to participate in a knowingly illegal system of physician regulation, that violated Kaul's civil rights, his constitutionally protected right to due process and his right to an impartial tribunal, by willfully conducting proceedings through and by Defendant NJBME, the New Jersey Office of Administrative Law and the Office of the New Jersey Attorney General. These governmental agencies are all subservient to the executive branch of state government. This is an illegal configuration that violates the separation of powers principle of the United States Constitution, a principle that protects citizens due process rights when life, liberty and property are at stake. **(xx)** Scheme to abuse the authority of the office of the Governor of the State of New Jersey for the purposes of accepting bribes, as part of a series quid pro quo schemes purposed to have Defendant NJBME revoke Kaul's license + Scheme to violate Kaul's right to due process by failing to exclude Defendant Hafner from any further involvement in Kaul's case and or his application in 2014 for reinstatement of his medical license. This was a knowing and willful violation based on the fact that Kaul had filed an ethics complaint against Hafner in September 2013. **(xxi)** Scheme to deprive Kaul of his civil rights and right to due process by permitting Defendant Hafner, an individual involved in a personal relationship with Defendant Kaufman, who, like Defendant Kaufman, had demonstrated an inexplicable personal animus towards Kaul.

Tactics Employed:

The Defendants scheme involved the following tactics, at the center of which lay the 'pawn' like manipulation of Kaul's patients to provide false testimony against Kaul, and perjure themselves by claiming that their pain increased after the care they received from Kaul:

2012 to 2016(The illegal revocation of Kaul's license + The manipulation of public opinion against Kaul + The filing of multiple frivolous medical malpractice lawsuits in corrupted NJ state courts - Essex County/Union County):

(i) Conspire to and commit bribery by funneling bribes in a series of quid pro quo schemes to Defendant Christie from the NJ plaintiff's bar, Defendant Brown, the American Association of Orthopedic Surgeons and Defendant Murphy to have co-conspirator, New Jersey Board of Medical Examiners ("NJBME") revoke Kaul's license. (ii) Conspire to and collude with media co-conspirators, North Jersey Media Group/NJ. Com (Star Ledger) to publicize articles about the revocation/lawsuits, purposed to legitimize their crimes in the public eye and recruit more of Kaul's patients to file lawsuits. (iii) Conspire to and encourage patients to file lawsuits and complaints with co-conspirator, NJBME. (iv) Conspire to and encourage patients to file complaints with state and federal regulatory authorities, that the Defendants knew were false. (v) Conspired to and did participate in sham litigation and provided knowingly false testimony that caused the entry of multi-million-dollar judgments against Kaul and his medical malpractice carrier. (vi) Conspired to and did cause the filing/publication of these false judgments with the National Practitioners Data Bank, the State of New Jersey and in collusion with media co-conspirators, North Jersey Media Group/www.nj.com, into the public domain and onto the internet. (vii) Conspired to and did use the US mail and wires to cause a dissemination of these knowingly false judgments to members of the New Jersey medical/political/legal communities, the purpose of which was to aid and abet the destruction of Kaul's reputation. (viii) Conspired to and did provide knowingly false testimony under oath that the care Kaul delivered to his patients "grossly deviated" from the standard of care because Kaul did not possess alternative privileges or hospital privileges. (ix) Conspired to and did provide knowingly fraudulent testimony under oath that the care Kaul delivered to his patients "grossly deviated" from the standard of care, because Kaul's training did not involve an orthopedic or neurosurgical residency. (x) Conspired to and did participate in sham litigation against Kaul's physician employees, falsely testifying that they were not qualified to perform minimally invasive spine surgery and had committed insurance fraud. (xi) Conspired to and did participate in sham litigation purposed to professionally ostracize Kaul, cause him to leave the United States and prevent him from publicly exposing the Defendants crimes. (xii) Use of the US mail and wires to send patients letters/contact via telephone encouraging them to file frivolous lawsuits against Kaul. (xiii) Use of the US mail and wires to defraud patients of their right to honest services by communicating knowingly false information that Kaul was not qualified to perform minimally invasive spine surgery. (xiv) Use of the US mail and wires to send knowingly false information to personal injury attorneys that Kaul was not qualified to perform minimally invasive spine surgery, had committed insurance fraud and was going to be indicted by the US Attorney for the District of New Jersey. (xv) Use of the US mail and wires to send knowingly false information to New Jersey politicians, encouraging them to coerce co-conspirator, NJBME, to revoke Kaul's license. (xvi) Use of the US mail and wires to order NJ state court judges to enter judgments against Kaul and his malpractice carrier in any and all medical malpractice cases filed against him. (xvii) Conspire and collude with law/public relation/political lobbying firms to funnel kickbacks to Defendant Christie, as part of a knowingly illegal series of quid pro quo schemes, in which a

percentage of the judgments were given to Christie in return for him using his executive power to have Kaul's license revoked, order corrupted state court judges to enter multi-million dollar judgments against Kaul/his medical malpractice carrier and order the New Jersey media to publicize each and every judgment. **(xvii)** Conspire and collude with the legal/political apparatus of the State of New Jersey to perpetrate a knowingly illegal scheme to defraud Kaul, his medical malpractice carrier and the public of their property, their right to honest services and medical care. **(xviii)** Conspire and collude to deprive Kaul of his constitutionally protected right to an impartial tribunal in proceedings, the outcomes of which resulted in the loss of his livelihood, property and liberty. **(xix)** Conspire and collude to use the US mail and wires to order members of the New Jersey medico-legal community to not provide expert testimony or legal services in his defense of these frivolous medical malpractice lawsuits. **(xx)** Conspire and collude to use the US mail and wires to transmit information in furtherance of Defendant Christie's scheme to illegally have his attorney general and acting director of the division of consumer affairs have co-conspirator, NJBME, revoke Kaul's license. **(xxi)** Conspire and collude to obstruct justice by bribing or abusing the power of public office to corrupt state court judges into rendering multi-million-dollar judgments against Kaul and his medical malpractice carrier. **(xxii)** Conspire and collude to use the US mail and wires to transmit the illegal consequences of a massive 'Fraud on the Court' (the revocation/state court judgments) to the public, national (state/federal) and international healthcare agencies/regulatory bodies, in furtherance of the Defendants scheme to destroy Kaul's reputation globally, his livelihood, his economic standing and prevent him from obtaining a medical license anywhere in the world, or indeed any form of employment.

Location:

Governor's Office in Trenton + Christie/Republican Political Fundraisers + Office of the NJ AG.

179. Defendant Kaufman + Defendant AQR

Date Range: 2010 to 2017.

Mode of Communications: Email + Face-To-Face.

Substance of Communications: **(i)** Scheme to revoke Kaul's license. **(ii)** Scheme to destroy Kaul's reputation. **(iii)** Scheme to destroy Kaul's economic standing. **(iv)** Scheme to have Kaul ostracized. **(v)** Scheme to have Kaul leave the United States. **(vi)** Scheme to use the bankruptcy proceedings to defraud Kaul of his assets, his real estate holdings and \$ 45 million owed to him by insurance companies, including defendants Allstate + Geico. **(vii)** Scheme to conceal from Kaul the defendants' pattern of racketeering in the United States Bankruptcy Court for the District of New Jersey. **(viii)** Conspiracy to obstruct justice and have entered adverse rulings in all cases filed against Kaul in administrative/state/bankruptcy/federal courts within the geographic boundaries of New Jersey. **(viii)** Conspiracy to use the media to propagate the fraudulent judgments/rulings procured in these courts. **(ix)** Conspiracy to use the US mail and wires to disseminate these fraudulent judgments/rulings to every local/state/federal/international healthcare related agency, including the DEA, the National Practitioners Data Bank, every state medical board and every medical council in the world. **(x)** Conspiracy to prevent Kaul from ever finding any employment anywhere in the world, in order that he would never be able to expose the crimes of The

Kaul Cases Defendants (in the period from April 2, 2012 to February 22, 2016, every time an article was published about one of the fraudulent cases, the journalist would ask a lawyer who had been associated with Kaul, whether he had left the country and if so, in what country was he residing - the purpose being to ascertain the likelihood that **The Kaul Cases** Defendants crimes would go undetected and to attempt to attack his position in that particular country.

Tactics Employed: (i) Use of US mail and wires to file false insurance fraud complaints against him with Defendant NJBME. (ii) Use of the US mail and wires to communicate false information to patients, that he was not qualified to perform minimally invasive spine surgery. (iii) Use of the US mail and wires to send false information to personal injury lawyers that Kaul was not qualified to perform minimally invasive spine surgery and had committed insurance fraud. (iv) Use of the US mail and wires to send false information to New Jersey politicians, encouraging them, with the promise of political campaign 'donations' to coerce Defendant NJBME and the New Jersey Attorney General to have Kaul's license revoked (v) Use of the US mail and wires to organize and further schemes to bribe Defendant Christie, in order to have him order Defendant NJBME to revoke Kaul's license. (vi) Use of law and public relation firms to funnel bribes to Christie as part of quid pro quo schemes to revoke Kaul's license, destroy his reputation and cause him to leave the United States. (vii) Use of the US mail and wires to further scheme to have Kaul's license revoked by having Defendant Lomazow (works for the insurance industry) use his authority on Defendant NJBME to initiate an investigation against Kaul, in order to have his license revoked. (viii) Use of the US mail and wires to organize and further orders from Christie to revoke Kaul's license, in furtherance of quid pro quo schemes of bribery. (ix) Use of the US mails and wires to transmit written, telephone, or electronic communications regarding the knowingly fraudulent events surrounding the revocation of Kaul's license. (x) Use of the US mails and wires to transmit written, telephone, or electronic communications regarding discussions between the CHO RICO Association-In-Fact Defendants and state and federal politicians about the illegal scheme to revoke Kaul's license. (xi) Use of the US mails and wires to bill and collect the increased revenues that flowed from the illegal elimination of Kaul from the practice of medicine. (xii) Use of the US mails and wires to transmit information in furtherance of Christie's scheme to illegally have his attorney general and acting director of the division of consumer affairs have Defendant NJBME revoke Kaul's license. (xiii) Use of the US mails and wires to transmit information in furtherance of their scheme of converting the United States Bankruptcy Court into a racketeering enterprise. (xiv) Use of the US mails and wires to transmit false information that Kaul has committed insurance fraud, was not qualified to perform minimally invasive spine surgery, had committed bank fraud and was going to be criminally indicted for Medicare fraud + Obstruction of justice and evidence tampering ('The Solomon Critique' + 'The Solomon Critique 2'). (xv) Use of the US mail and wires to transmit the illegal consequences of the obstruction of justice and evidence tampering ('The Solomon Critique' + 'The Solomon Critique 2') to the public, national (state + federal) and international healthcare agencies and regulatory bodies, in furtherance of the defendants scheme to destroy Kaul's reputation globally, his livelihood, his economic standing and prevent him from obtaining a medical license anywhere in the world, or indeed any form of employment. (xiv) Use of the US mail and

wires to attempt to have Kaul's medical school (Royal Free/UCL Medical School, London, UK) erase his degrees in medicine/surgery (M.B. B.S.).
Location: Governor's Office in Trenton + Christie/Republican Political Fundraisers + United States Bankruptcy Court for the District of New Jersey + Law Offices of Wasserman/Jurista/Stolz.

180. Defendant Christie + Defendant AQR

Date Range: 2010 to 2017.

Conduits of Communication + Bribery to Christie: Public Relation/Political Lobbying Firms (Mercury Public Relations + Princeton Public Relations) + Law/Political Lobbying Firms (Brach Eichler + Wolf Samson + Wasserman Jurista Stolz) + Through state government intermediary + Directly + Political campaign fundraisers + Political campaign donations.

Mode of Communications: Email + Face-To-Face.

Substance of Communications: **(i)** Scheme to revoke Kaul's license. **(ii)** Scheme to destroy Kaul's reputation. **(iii)** Scheme to destroy Kaul's economic standing. **(iv)** Scheme to have Kaul ostracized. **(v)** Scheme to have Kaul leave the United States. **(vi)** Scheme to use the bankruptcy proceedings to defraud Kaul of his assets, his real estate holdings and \$ 45 million owed to him by insurance companies, including defendants Allstate + Geico. **(vii)** Scheme to conceal from Kaul the defendants' pattern of racketeering in the United States Bankruptcy Court for the District of New Jersey. **(viii)** Conspiracy to obstruct justice and have entered adverse rulings in all cases filed against Kaul in administrative/state/bankruptcy/federal courts within the geographic boundaries of New Jersey. **(viii)** Conspiracy to use the media to propagate the fraudulent judgments/rulings procured in these courts. **(ix)** Conspiracy to use the US mail and wires to disseminate these fraudulent judgments/rulings to every local/state/federal/international healthcare related agency, including the DEA, the National Practitioners Data Bank, every state medical board and every medical council in the world. **(x)** Conspiracy to prevent Kaul from ever finding any employment anywhere in the world, in order that he would never be able to expose the crimes of **The Kaul Cases** Defendants (in the period from April 2, 2012 to February 22, 2016, every time an article was published about one of the fraudulent cases, the journalist would ask a lawyer who had been associated with Kaul, whether he had left the country and if so, in what country was he residing - the purpose being to ascertain the likelihood that **The Kaul Cases** Defendants crimes would go undetected and to attempt to attack his position in that particular country.

Tactics Employed: **(i)** Use of US mail and wires to file false insurance fraud complaints against him with Defendant NJBME. **(ii)** Use of the US mail and wires to communicate false information to patients, that he was not qualified to perform minimally invasive spine surgery. **(iii)** Use of the US mail and wires to send false information to personal injury lawyers that Kaul was not qualified to perform minimally invasive spine surgery and had committed insurance fraud. **(iv)** Use of the US mail and wires to send false information to New Jersey politicians, encouraging them, with the promise of political campaign 'donations' to coerce Defendant NJBME and the New Jersey Attorney General to have Kaul's license revoked **(v)** Use of the US mail and wires to organize and further schemes to bribe Defendant Christie, in order to have him order Defendant

NJBME to revoke Kaul's license. **(vi)** Use of law and public relation firms to funnel bribes to Christie as part of quid pro quo schemes to revoke Kaul's license, destroy his reputation and cause him to leave the United States. **(vii)** Use of the US mail and wires to further scheme to have Kaul's license revoked by having Defendant Lomazow (works for the insurance industry) use his authority on Defendant NJBME to initiate an investigation against Kaul, in order to have his license revoked. **(viii)** Use of the US mail and wires to organize and further orders from Christie to revoke Kaul's license, in furtherance of quid pro quo schemes of bribery. **(ix)** Use of the US mails and wires to transmit written, telephone, or electronic communications regarding the knowingly fraudulent events surrounding the revocation of Kaul's license. **(x)** Use of the US mails and wires to transmit written, telephone, or electronic communications regarding discussions between the CHO RICO Association-In-Fact Defendants and state and federal politicians about the illegal scheme to revoke Kaul's license. **(xi)** Use of the US mails and wires to bill and collect the increased revenues that flowed from the illegal elimination of Kaul from the practice of medicine. **(xii)** Use of the US mails and wires to transmit information in furtherance of Christie's scheme to illegally have his attorney general and acting director of the division of consumer affairs have Defendant NJBME revoke Kaul's license. **(xiii)** Use of the US mails and wires to transmit information in furtherance of their scheme of converting the United States Bankruptcy Court into a racketeering enterprise. **(xiv)** Use of the US mails and wires to transmit false information that Kaul has committed insurance fraud, was not qualified to perform minimally invasive spine surgery, had committed bank fraud and was going to be criminally indicted for Medicare fraud + Obstruction of justice and evidence tampering ('The Solomon Critique' + 'The Solomon Critique 2'). **(xv)** Use of the US mail and wires to transmit the illegal consequences of the obstruction of justice and evidence tampering ('The Solomon Critique' + 'The Solomon Critique 2') to the public, national (state + federal) and international healthcare agencies and regulatory bodies, in furtherance of the defendants scheme to destroy Kaul's reputation globally, his livelihood, his economic standing and prevent him from obtaining a medical license anywhere in the world, or indeed any form of employment. **(xiv)** Use of the US mail and wires to attempt to have Kaul's medical school (Royal Free/UCL Medical School, London, UK) erase his degrees in medicine/surgery (M.B. B.S.).

Location: Governor's Office in Trenton + Christie/Republican Political Fundraisers + United States Bankruptcy Court for the District of New Jersey + Law Offices of Wasserman/Jurista/Stolz.

RICO/Unjust Enrichment

**Enterprise - State of New Jersey-Connecticut-U.S.B.C.-DNJ (“NJC-US-E”)
Defendant Persons - Kaufman/Christie/AQR/CGLIC
Pattern of Racketeering/RICO Predicate Acts - Mail
Fraud/Wire/Conspiracy/Obstruction of Justice/Bribery/Kickbacks**

Overview:

181. In a period commencing in approximately 2009, the Defendants did conspire to conduct and did conduct a **“pattern of racketeering”** through the **“enterprise”** of the State of New Jersey and its executive/judicial/legislative branches in furtherance of both their political/economic agendas and those of their co-conspirators and **The Kaul Cases** Defendants.
182. The Defendants’ **“pattern of racketeering”** consisted of the knowingly illegal commission of thousands of the RICO predicate acts of mail fraud/wire fraud/conspiracy/obstruction of justice/bribery/kickbacks, all purposed to illegally divert monies/services from the American public/medical profession, a grand scheme of embezzlement.
183. The Defendants, in an attempt to further bolster the cover provided by the State of New Jersey, did use a system of so called ‘politically connected’ law/public relation/political lobbying firms (**“secondary cover”**) through which were funneled bribes and information necessary for the commission of their crimes.
184. The Defendants did knowingly commit hundreds of felonies in collusion/conspiracy with the executive/legislative/judicial branches of the NJ state government/NJ division of the judicial branch of the federal government, in the mistaken belief that their system of secondary cover would prevent Kaul and or any state/federal investigative/prosecutorial authorities from exposing their crimes.
185. Defendants AQR/CGLIC did launder the proceeds of their crimes on the NYSE, through the investment in a multitude of other publicly traded corporations.
186. The Defendants, in laundering their criminal proceeds through the NYSE, have converted it and the corporations in which they invested into **“racketeering enterprises”** that have defrauded the market/public of their right to honest services and made liable the NYSE pursuant to both civil/criminal RICO. The NYSE has aided/abetted the Defendants crimes of money-laundering.
187. Defendant Christie, in recognition of the lack of regulation of hedge-funds, did convert Defendant AQR into a racketeering **“enterprise”** through which he conducted a **“pattern of racketeering”** through the acquisition of shares and the laundering of the financial proceeds derived from the **“pattern of racketeering”** conducted in the enterprise of the State of New Jersey, a violation pursuant to section 1962(a).

188. The Defendants' conducted an **"open-ended pattern of racketeering"** that is ongoing, has been in existence since at least 1999 and has victimized multiple physicians, who have either had their licenses suspended/revoked, been incarcerated and or committed suicide. The majority of these physicians are either Indian or Middle Eastern and the **"pattern"** poses a continuing threat.

189. The cause of the open-endedness pertains to: **(i)** the ongoing system of political campaign financing, wherein corporations/individuals such as the Defendants, can, by virtue of Citizens United, funnel unlimited amounts of so called 'dark money' into political campaign coffers and thus control state governments; **(ii)** the ongoing control of state medical boards (K1/K2/K5/K7) by state governments, which are themselves controlled by the insurance industry; **(iii)** the ongoing control of state courts by state governments, which are controlled by the insurance industry; **(iv)** the system whereby federal judges are appointees of the political establishment, which itself is controlled by the insurance industry.

190. This system denies substantive justice in potentially any American court, to any physician illegally deprived of his life/liberty/property by the insurance industry and poses an existential threat to the American medical profession and thus the American public.

191. The Defendants' knowing violation of RICO was conducted in conjunction with a plan to cause a knowingly illegal unjust enrichment of the Defendants that they intended would cause an illegitimate impoverishment of Kaul, for which they believed he would have no legal remedy, as the illegal revocation/judgments were perpetrated under the cover of the State of New Jersey. The Defendants conspired to have Kaul provide minimally invasive spine surgery services to the injured clients of **The Kaul Cases** Defendants, Allstate/Geico, two corporations in which Defendant AQR maintains a controlling position, with the intention of defrauding him of the property of his professional services.

192. Defendant AQR's (Allstate/Geico) scheme of unjust enrichment has been in existence for at least decades and has defrauded hundreds of millions of dollars from physicians, in the knowledge that the physician will provide care to injured clients expecting to be compensated at some point in the future (average time from service to payment is 2 years) through a no-fault arbitration system. The scheme has no intention of ever paying the physician, and once the physician's accounts receivable reaches a certain amount, Defendants AQR/Christie/CGLIC/Kaufman manufactured a false case to have the physician's license suspended/revoked and or have him indicted/incarcerated. The scheme was perpetrated in conspiracy/collusion with the State of New Jersey. This is no different to the state-sponsored terrorism conducted out of Iran. In both the motive consists of furthering political/economic agendas and the method involves using the law to both justify and provide cover for the crimes.

193. The elements and the pattern of criminal conduct of the Defendants scheme involved the perpetration of a massive lie, which included the knowing falsehoods that Kaul was not qualified to perform minimally invasive spine surgery, had committed insurance fraud and had injured patients. The Defendants knew these statements to be lies, but propagated them nonetheless, as they believed Kaul would not expose their crimes.

194. Defendant Christie + Defendant CGLIC

Date Range: 2010 to 2017.

Conduits of Communication + Bribery to Christie: Public Relation/Political Lobbying Firms (Mercury Public Relations + Princeton Public Relations) + Law/Political Lobbying Firms (Brach Eichler + Wolf Samson + Wasserman Jurista Stolz) + Through state government intermediary + Directly + Political campaign fundraisers + Political campaign donations.

Mode of Communications: Email + Face-To-Face.

Substance of Communications: (i) Scheme to revoke Kaul's license. (ii) Scheme to destroy Kaul's reputation. (iii) Scheme to destroy Kaul's economic standing. (iv) Scheme to have Kaul ostracized. (v) Scheme to have Kaul leave the United States. (vi) Scheme to use the bankruptcy proceedings to defraud Kaul of his assets, his real estate holdings and \$ 45 million owed to him by insurance companies, including defendants Allstate + Geico. (vii) Scheme to conceal from Kaul the defendants' pattern of racketeering in the United States Bankruptcy Court for the District of New Jersey. (viii) Conspiracy to obstruct justice and have entered adverse rulings in all cases filed against Kaul in administrative/state/bankruptcy/federal courts within the geographic boundaries of New Jersey. (viii) Conspiracy to use the media to propagate the fraudulent judgments/rulings procured in these courts. (ix) Conspiracy to use the US mail and wires to disseminate these fraudulent judgments/rulings to every local/state/federal/international healthcare related agency, including the DEA, the National Practitioners Data Bank, every state medical board and every medical council in the world. (x) Conspiracy to prevent Kaul from ever finding any employment anywhere in the world, in order that he would never be able to expose the crimes of The Kaul Cases Defendants (in the period from April 2, 2012 to February 22, 2016, every time an article was published about one of the fraudulent cases, the journalist would ask a lawyer who had been associated with Kaul, whether he had left the country and if so, in what country was he residing - the purpose being to ascertain the likelihood that The Kaul Cases Defendants crimes would go undetected and to attempt to attack his position in that particular country.

Tactics Employed: (i) Use of US mail and wires to file false insurance fraud complaints against him with Defendant NJBME. (ii) Use of the US mail and wires to communicate false information to patients, that he was not qualified to perform minimally invasive spine surgery. (iii) Use of the US mail and wires to send false information to personal injury lawyers that Kaul was not qualified to perform minimally invasive spine surgery and had committed insurance fraud. (iv) Use of the US mail and wires to send false information to New Jersey politicians, encouraging them, with the promise of political campaign 'donations' to coerce Defendant NJBME and the New Jersey Attorney General to have Kaul's license revoked (v) Use of the US mail and wires to organize

and further schemes to bribe Defendant Christie, in order to have him order Defendant NJBME to revoke Kaul's license. **(vi)** Use of law and public relation firms to funnel bribes to Christie as part of quid pro quo schemes to revoke Kaul's license, destroy his reputation and cause him to leave the United States. **(vii)** Use of the US mail and wires to further scheme to have Kaul's license revoked by having Defendant Lomazow (works for the insurance industry) use his authority on Defendant NJBME to initiate an investigation against Kaul, in order to have his license revoked. **(viii)** Use of the US mail and wires to organize and further orders from Christie to revoke Kaul's license, in furtherance of quid pro quo schemes of bribery. **(ix)** Use of the US mails and wires to transmit written, telephone, or electronic communications regarding the knowingly fraudulent events surrounding the revocation of Kaul's license. **(x)** Use of the US mails and wires to transmit written, telephone, or electronic communications regarding discussions between the CHO RICO Association-In-Fact Defendants and state and federal politicians about the illegal scheme to revoke Kaul's license. **(xi)** Use of the US mails and wires to bill and collect the increased revenues that flowed from the illegal elimination of Kaul from the practice of medicine. **(xii)** Use of the US mails and wires to transmit information in furtherance of Christie's scheme to illegally have his attorney general and acting director of the division of consumer affairs have Defendant NJBME revoke Kaul's license. **(xiii)** Use of the US mails and wires to transmit information in furtherance of their scheme of converting the United States Bankruptcy Court into a racketeering enterprise. **(xiv)** Use of the US mails and wires to transmit false information that Kaul has committed insurance fraud, was not qualified to perform minimally invasive spine surgery, had committed bank fraud and was going to be criminally indicted for Medicare fraud + Obstruction of justice and evidence tampering ('The Solomon Critique' + 'The Solomon Critique 2'). **(xv)** Use of the US mail and wires to transmit the illegal consequences of the obstruction of justice and evidence tampering ('The Solomon Critique' + 'The Solomon Critique 2') to the public, national (state + federal) and international healthcare agencies and regulatory bodies, in furtherance of the defendants scheme to destroy Kaul's reputation globally, his livelihood, his economic standing and prevent him from obtaining a medical license anywhere in the world, or indeed any form of employment. **(xiv)** Use of the US mail and wires to attempt to have Kaul's medical school (Royal Free/UCL Medical School, London, UK) erase his degrees in medicine/surgery (M.B. B.S.).
Location: Governor's Office in Trenton + Christie/Republican Political Fundraisers + United States Bankruptcy Court for the District of New Jersey + Law Offices of Wasserman/Jurista/Stolz.

195. Defendant Christie + Defendant AQR:

Date Range: See above. As with Defendant Christie + CGLIC.

Conduits of Communication + Bribery to Christie: See above. As with Defendant Christie + CGLIC.

Mode of Communications: See above. As with Defendant Christie + CGLIC.

Substance of Communications: See above. As with Defendant Christie + CGLIC.

Tactics Employed: See above. As with Defendant Christie + CGLIC.

Location: See above. As with Defendant Christie + CGLIC.

196. Defendant Christie + Defendant Kaufman:

Date range: 2010 to 2017.

Conduits of Communication + Bribery to Christie:

Through state government intermediaries.

Mode of communications: Email + Voice Message + SMS + Face-To-Face

Substance of communications:

(i) Scheme to encourage patients to initiate civil litigation and medical board complaints against Kaul and similarly trained physicians. (ii) Scheme to obstruct justice by abusing the power of political/public office to corrupt NJ state court judges into entering fraudulent judgments against Kaul and his medical malpractice carriers. (iii) Scheme to file complaints against Kaul with state and federal regulatory authorities. (iv) Scheme to participate in sham litigation against Kaul. (v) Scheme to participate in sham litigation against Kaul's physician employees. (vi) Scheme to revoke Kaul's license. (vii) Scheme to destroy Kaul's reputation. (viii) Scheme to destroy Kaul's economic standing. (ix) Scheme to have Kaul ostracized. (x) Scheme to have Kaul leave the United States. (xi) Scheme to have co-conspirator and NJ Administrative Law Judges, Jay Howard Solomon buttress co-conspirator, Gregory Przybylski's knowingly false testimony that every aspect of the care Kaul delivered to his patients "grossly deviated" from the standard of care. (xii) Scheme to have Defendant Hafner pervert the course of justice by buttressing Defendant Przybylski's knowingly false testimony that every aspect of the care Kaul delivered to his patients "grossly deviated" from the standard of care. (xiii) Scheme to engage in evidence tampering and perjury in the administrative board proceedings, that caused the revocation of Kaul's license, as evidenced in 'The Solomon Critique' (K1-D.E. 225 Page ID 4940) and 'The Solomon Critique 2' (K1-D.E. 299 Page ID 7202). (xiv) Scheme to violate Kaul's right to due process, his right to an impartial tribunal and his civil rights, through the commission of knowingly false testimony that Kaul had allegedly "grossly deviated" from the standard of care for reasons pertaining to qualifications, credentials, alternative privileges and hospital privileges. Defendant Hafner knew that under the law the standard of care is not determined by any of these reasons, but simply by the manner in which the care is delivered, but yet in this knowledge she abused the power of public office for personal and political gain, at the expense of the public. (xv) Scheme to abuse the power of public office and quasi-judicial proceedings to perpetrate a massive fraud on the public, by willfully misrepresenting that Kaul was not qualified, credentialed or licensed to perform minimally invasive spine surgery. The defendants knew that Kaul possessed a license to practice medicine and surgery, had been credentialed by at least six state licensed surgical centers to perform minimally invasive spine surgery, did not require alternative or hospital privileges to perform minimally invasive spine surgery, had commenced his training in minimally invasive spine surgery in 2002, three years before co-conspirator Gregory Przybylski, a market competitor and 'expert' for Defendant NJBME. (xvi) Scheme to propagate to the public, a knowingly false interpretation of the alternative privilege regulation, in the knowledge that they were abusing the power of public office for personal and political gain. The defendants knew that Kaul did not require alternative privileges to perform minimally invasive spine surgery in his outpatient surgical center. (xvii) Scheme to suppress evidence of the superior clinical

outcomes of Kaul's minimally invasive spine surgery practice, by refusing to have Kaul's practice independently analyzed and monitored. **(xviii)** Scheme to engage in obstruction of justice by ignoring Kaul's written requests for an independent investigation of Kaul's claims of evidence tampering. **(xix)** Scheme to participate in a knowingly illegal system of physician regulation, that violated Kaul's civil rights, his constitutionally protected right to due process and his right to an impartial tribunal, by willfully conducting proceedings through and by Defendant NJBME, the New Jersey Office of Administrative Law and the Office of the New Jersey Attorney General. These governmental agencies are all subservient to the executive branch of state government. This is an illegal configuration that violates the separation of powers principle of the United States Constitution, a principle that protects citizens due process rights when life, liberty and property are at stake. **(xx)** Scheme to abuse the authority of the office of the Governor of the State of New Jersey for the purposes of accepting bribes, as part of a series quid pro quo schemes purposed to have Defendant NJBME revoke Kaul's license + Scheme to violate Kaul's right to due process by failing to exclude Defendant Hafner from any further involvement in Kaul's case and or his application in 2014 for reinstatement of his medical license. This was a knowing and willful violation based on the fact that Kaul had filed an ethics complaint against Hafner in September 2013. **(xxi)** Scheme to deprive Kaul of his civil rights and right to due process by permitting Defendant Hafner, an individual involved in a personal relationship with Defendant Kaufman, who, like Defendant Kaufman, had demonstrated an inexplicable personal animus towards Kaul.

Tactics Employed:

The Defendants scheme involved the following tactics, at the center of which lay the 'pawn' like manipulation of Kaul's patients to provide false testimony against Kaul, and perjure themselves by claiming that their pain increased after the care they received from Kaul:

2012 to 2016(The illegal revocation of Kaul's license + The manipulation of public opinion against Kaul + The filing of multiple frivolous medical malpractice lawsuits in corrupted NJ state courts - Essex County/Union County):

(i) Conspire to and commit bribery by funneling bribes in a series of quid pro quo schemes to Defendant Christie from the NJ plaintiff's bar, Defendant Brown, the American Association of Orthopedic Surgeons and Defendant Murphy to have co-conspirator, New Jersey Board of Medical Examiners ("NJBME") revoke Kaul's license. **(ii)** Conspire to and collude with media co-conspirators, North Jersey Media Group/NJ. Com (Star Ledger) to publicize articles about the revocation/lawsuits, purposed to legitimize their crimes in the public eye and recruit more of Kaul's patients to file lawsuits. **(iii)** Conspire to and encourage patients to file lawsuits and complaints with co-conspirator, NJBME. **(iv)** Conspire to and encourage patients to file complaints with state and federal regulatory authorities, that the Defendants knew were false. **(v)** Conspired to and did participate in sham litigation and provided knowingly false testimony that caused the entry of multi-million-dollar judgments against Kaul and his medical malpractice carrier. **(vi)** Conspired to and did cause the filing/publication of these false judgments with the National Practitioners Data Bank, the State of New Jersey and in collusion with media co-conspirators, North Jersey Media Group/www.nj.com, into the public domain and onto the internet. **(vii)** Conspired to and

did use the US mail and wires to cause a dissemination of these knowingly false judgments to members of the New Jersey medical/political/legal communities, the purpose of which was to aid and abet the destruction of Kaul's reputation. **(viii)** Conspired to and did provide knowingly false testimony under oath that the care Kaul delivered to his patients "grossly deviated" from the standard of care because Kaul did not possess alternative privileges or hospital privileges. **(viii)** Conspired to and did provide knowingly fraudulent testimony under oath that the care Kaul delivered to his patients "grossly deviated" from the standard of care, because Kaul's training did not involve an orthopedic or neurosurgical residency. **(ix)** Conspired to and did participate in sham litigation against Kaul's physician employees, falsely testifying that they were not qualified to perform minimally invasive spine surgery and had committed insurance fraud. **(x)** Conspired to and did participate in sham litigation purposed to professionally ostracize Kaul, cause him to leave the United States and prevent him from publicly exposing the Defendants crimes. **(xi)** Use of the US mail and wires to send patients letters/contact via telephone encouraging them to file frivolous lawsuits against Kaul. **(xii)** Use of the US mail and wires to defraud patients of their right to honest services by communicating knowingly false information that Kaul was not qualified to perform minimally invasive spine surgery. **(xiii)** Use of the US mail and wires to send knowingly false information to personal injury attorneys that Kaul was not qualified to perform minimally invasive spine surgery, had committed insurance fraud and was going to be indicted by the US Attorney for the District of New Jersey. **(xiv)** Use of the US mail and wires to send knowingly false information to New Jersey politicians, encouraging them to coerce co-conspirator, NJBME, to revoke Kaul's license. **(xv)** Use of the US mail and wires to order NJ state court judges to enter judgments against Kaul and his malpractice carrier in any and all medical malpractice cases filed against him. **(xvi)** Conspire and collude with law/public relation/political lobbying firms to funnel kickbacks to Defendant Christie, as part of a knowingly illegal series of quid pro quo schemes, in which a percentage of the judgments were given to Christie in return for him using his executive power to have Kaul's license revoked, order corrupted state court judges to enter multi-million dollar judgments against Kaul/his medical malpractice carrier and order the New Jersey media to publicize each and every judgment. **(xvii)** Conspire and collude with the legal/political apparatus of the State of New Jersey to perpetrate a knowingly illegal scheme to defraud Kaul, his medical malpractice carrier and the public of their property, their right to honest services and medical care. **(xviii)** Conspire and collude to deprive Kaul of his constitutionally protected right to an impartial tribunal in proceedings, the outcomes of which resulted in the loss of his livelihood, property and liberty. **(xix)** Conspire and collude to use the US mail and wires to order members of the New Jersey medico-legal community to not provide expert testimony or legal services in his defense of these frivolous medical malpractice lawsuits. **(xx)** Conspire and collude to use the US mail and wires to transmit information in furtherance of Defendant Christie's scheme to illegally have his attorney general and acting director of the division of consumer affairs have co-conspirator, NJBME, revoke Kaul's license. **(xxi)** Conspire and collude to obstruct justice by bribing or abusing the power of public office to corrupt state court judges into rendering multi-million-dollar judgments against Kaul and his medical malpractice carrier. **(xxii)** Conspire and collude to use the US mail and wires to transmit the illegal consequences of a massive 'Fraud on the Court' (the revocation/state court

judgments) to the public, national (state/federal) and international healthcare agencies/regulatory bodies, in furtherance of the Defendants scheme to destroy Kaul's reputation globally, his livelihood, his economic standing and prevent him from obtaining a medical license anywhere in the world, or indeed any form of employment.

Location:

Governor's Office in Trenton + Christie/Republican Political Fundraisers + Office of the NJ AG.

197. Defendant AQR + Defendant Kaufman

Date Range: See above. As with Defendant Christie + CGLIC.

Mode of Communications: See above. As with Defendant Christie + CGLIC.

Substance of Communications: See above. As with Defendant Christie + CGLIC.

Tactics Employed: See above. As with Defendant Christie + CGLIC.

Location: See above. As with Defendant Christie + CGLIC.

198. Defendant CGLIC + Defendant Kaufman

As with Defendant AQR + Defendant Kaufman.

Relief

1. Compensatory/Consequential/Punitive monetary damages, to be calculated as a percentage of the amount identified in K1: D.E. 1 Page ID 200.
2. Injunctive/Declaratory Relief identified in K1: D.E. 1 Page ID 200.
3. Immediate reinstatement of license to practice medicine/surgery in the State of New Jersey.
4. Immediate transmission to all domestic (state/federal) and foreign healthcare regulatory agencies, including the NPDB/DEA/Medicare/American Board of Anesthesiology/All State Medical Boards that the revocation of Kaul's New Jersey license was procured illegally and is illegal.
5. Immediate instruction to Medicare to reinstate Kaul's Medicare number.
6. Immediate instruction to NPDB to expunge from the record all medical board/administrative/state court judgments/rulings that occurred in the period from April 2, 2012 to the present.
7. Immediate instruction to the DEA to reinstate Kaul's DEA license.
8. Immediate reinstatement of Kaul's state prescribing CDS license.
9. Immediate restitution to Kaul of state licenses for the NJSR Surgical Center and NJSR Surgical Center II.
10. Immediate instruction to the American Board of Anesthesiology to reinstate Kaul's board certification.
11. Immediate transmission to all NJ hospitals/surgical centers that the revocation of Kaul's license was procured illegally and is illegal.
12. Immediate instruction to the State of New Jersey to expunge from the record all civil judgments entered after February 2, 2010.
13. Immediate transmission to all of Kaul's medical malpractice insurance carriers that all judgments paid out after February 2, 2010 were procured as a consequence of, and through a 'Fraud on the Court'.
14. Immediate instruction to the United States Trustee that all orders/judgments entered in bankruptcy proceeding 13-23366 were procured as a consequence of, and through a 'Fraud on the Court'.

15. Immediate instruction to the United States Trustee that all order/judgments entered in bankruptcy proceeding 13-2336 (June 17, 2013 to July 30, 2020) be reversed and or made null/void.
16. Immediate instruction to the United States Trustee that all monies embezzled from the estate/not collected from insurance carriers (approximately \$45 million) be returned into the possession of Kaul.
17. Immediate instruction to the media outlets identified in K1 (D.E.1 Page 200) to publish nine hundred (900) word articles regarding **The Kaul Cases**, that must be pre-approved by Kaul.
18. Immediate order to every state medical board to come into compliance with the due process clauses of the State Constitution and that of the United States and submit evidence of such compliance to the United States District Court and the United States Government, as part of a **“Reformation of American Medical Boards”**.
19. Immediate order to every state medical board to come into compliance with the antitrust mandates of the Supreme Court of the United States in North Carolina Dental Board v FTC, and to submit evidence of such compliance to the United States District Court and the United States Government, as part of a **“Reformation of American Medical Boards”**.
20. Immediate order mandating all members of all state medical boards to disclose to the public record their financial holdings/conflicts of interest/ex parte communications with any agents associated with: **(i)** the insurance/hospital/pharmaceutical/medical device industries; **(ii)** the legislative/executive/judicial branches of state/federal government, regarding any pending/future cases before them.
21. Immediate order prohibiting any persons who are either themselves beneficiaries of the insurance/hospital/pharmaceutical/medical device industries or whose family members to the third degree are beneficiaries.
22. Immediate order prohibiting any persons who are members of any state medical board and or family members to the third degree from receiving future material benefits from the insurance/hospital/pharmaceutical/medical device industries.
23. Immediate order that all NJ state court judges involved in any of the civil cases filed/adjudicated against Kaul after February 3, 2010 disclose to the record for the period from 2006 to 2021 any and all: **(i)** conflicts of interest; **(ii)** ex parte communications; **(iii)** tangible/intangible benefits procured for themselves or family members to the third degree, from the insurance/hospital/pharmaceutical/medical device industries and through law firms/political lobbyists/public relation firms, regardless of whether they remain on the bench or not.

Dated: March 23, 2021

Handwritten signature in black ink, appearing to be 'R. Kaul'.

RICHARD ARJUN KAUL, MD

MAR 30 2021 PM 12:54
FILED-USDC-CT-NEW HAVEN

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

RICHARD ARJUN KAUL, MD Plaintiff v. MICHAEL MURPHY, MD ET AL Defendants	Civil Action: 3:21cv439(VLB) CERTIFICATION OF PLAINTIFF
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I, Richard Arjun Kaul, MD, of full age, certify and say:

I am the Propria Persona Plaintiff ("Kaul").

I make this CERTIFICATION in support of this Complaint, which is filed on the basis of new evidence/new injury that constitutes a "new racketeering injury" and on evidence that the Defendants have perpetrated schemes of judicial corruption in the United States District Court for the District of New Jersey. This new evidence, which includes that of an injury in this district, substantiates that of a new claim in this district, pursuant to RICO.

I certify that the foregoing statements made by me 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 27, 2021



Richard Arjun Kaul, MD

Exhibit 2

RECEIVED

2/5/2021 DB

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

RICHARD ARJUN KAUL, MD

Plaintiff

v.

ALLSTATE INSURANCE COMPANY, ET AL

Defendants

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



Richard Arjun Kaul, MD

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

RICHARD ARJUN KAUL, MD

Civil Case:

Plaintiff

v.

CERTIFICATE OF SERVICE
ON ALL DEFENDANTS

ALLSTATE INSURANCE COMPANY, ET AL

Defendants

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

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

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

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 originatinating 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

Richard Arjun Kaul, MD

Exhibit 3

Kaul v Christie, et als

Settlement terms

1. Monetary compensation

(90% of all monies will be donated to The Spine Africa Project to implement healthcare and educational programs equally between the US + Africa + India)

1. Clinical services

a. US = \$ 28,171,028.828568999213 trillion

b. Africa + India + Colombia = \$22,406.70 billion

2. Educational services:

a. Global = \$1.45 billion

3. Intellectual property

a. Global = \$11,000 billion

~~Total = \$152,240.39 billion~~ \$ 28,171,062.239,418,999,213. P.L.

2. Reformation of the New Jersey Board of Medical Examiners (NJBME)

The current process of political appointment must be replaced by one in which Medical Board members are elected by New Jersey physicians. This will minimize the influence that the New Jersey insurance industry has on both policymaking and decisions taken by the NJBME. This changes will ensure that corporate interests are gradually removed from the public health arena, which will lead to a lowering of healthcare costs and a de-politicization of New Jersey medicine. The elections should occur every four years and could use the current electoral machinery.

3. Reformation of the financing of New Jersey political campaigns

The corrupting influence of money must be removed from the political process. To commence this change legislation must be enacted that prohibits corporations or private entities from giving money/gifts/commercial promises to candidates seeking the office of the governor. This position must be won on the strength of arguments alone and a system of public debates commencing six months before the election will allow the electorate to choose the most qualified candidate. The debate system will be funded from tax revenues.

4. Development and implementation of educational standards for Minimally Invasive Spine Surgery (MISS)

Under the auspices of The Society for Advanced Spinal Intervention (SASI) defendant NJBME will collaborate to develop a standard for the educational requirements necessary to perform cervical, thoracic and lumbar minimally invasive spine surgery and which must include all forms of minimally invasive discectomy and fusion. The standard will provide the foundation on which a multi-disciplinary fellowship can be developed. This will educate post-graduate physicians from the

disciplines of orthopedics, neurosurgery, interventional pain and physiatry and establish a globally accepted training standard.

5. Public apology

1. A public apology, signed by defendants Christie, Heary and Przybylski to Dr. Kaul's patients in the US and Africa whose lives were negatively impacted by the defendants wrongful acts. The apology must be published on the following media platforms:

- a. The New York Times- print + digital
- b. The New Jersey Star Ledger- print + digital
- c. The Bergen Record- print + digital
- d. The London Guardian- print + digital
- e. The Sydney Morning Herald- print + digital
- f. The Times of India- print + digital
- g. The New York Post- print + digital
- h. The BBC- digital
- i. The LA Times- print + digital

2. A separate public apology to Dr.Kaul's children whose lives were harmed as a consequence of the defendants wrongful acts. The apology must be published on the media platforms listed above and nine weeks after the apology described in 1.

The apologies must be approved by Dr. Kaul prior to publication.

6. Reinstatement of unrestricted plenary medical license

Notice of the reinstatement must be communicated via e-mail and registered mail to the following bodies.

1. The General Medical Council of the United Kingdom
2. The Federation of State Medical Boards
3. The medical licensing boards for every state in the US union.
4. The Indian Medical Council.
5. The Medical Licensing Authority of the UAE.
6. The Nigerian Medical Council.

The notices must be completed within 9 weeks of the reinstatement and proof of service provided to Dr.Kaul.

Economic damages for the United States

Clinical services

The calculations and data used to establish the monetary damages for each of the 50 states are described below. Dr. Kaul intended to replicate the NJSR outpatient model across the United States and internationally. The US expansion intended to open clinics in nine states every year commencing in 2013. His reputation, upon which he had built his business, was destroyed by the defendants media and internet strategy. This materially harmed his existing interests and has prevented him from developing the NJSR model in both the US and international markets. The damage caused to his reputation is irreparable, because Google will continue to indefinitely report the negative press caused by the defendants wrongful actions.

Dr.Kaul was 47 in April 2012 when defendant NJBME suspended his license. Based upon the life expectancy of an individual born in 1964 and raised in Western society he will live to 94 or 2059.

All monetary amounts are reported in millions.

1. New Jersey

**\$2,817,066,784,197,069.18729575424
(2012-2059)**

In 2003 Dr.Kaul's gross personal income was \$0.79 million and in the month of April 2012 his corporations collected \$1.2 million. The professional, facility and anesthetic fees generated for the period from March 2011-April 2012 were \$52 million. The corporations had demonstrated a 60% collection rate over a period of 9 years. Using the actual \$1.2 million collected in April with an expected 60% of the \$52 million fees generated the following calculation was estimate the amount of money that would have been collected in 2012 if the defendants had not committed their wrongful acts:

$$\$52,000,000 \times 60\% = \$31,200,000(a)$$

$\$1,200,000 \times 12 = \$14,400,000(b)$ which aggregates the monthly collections prior to April and takes the conservative position that the monthly next 8 months of 2012 would only have been \$1.2 million/month

A slightly greater weight (60%) is given to (a) as it's derivation is closer to an actual number. The weighted average of (a) and (b) = **\$20,520,000**

The factor by which the gross annual receipts had increased from 2003 to 2012 is calculated as below:

2003- \$790,000
2012-\$20,520,000

$$20,520,000 \text{ divided by } 790,000 = 25.94$$

25.94 is the 9 year index of revenue growth and is the number used to calculate the gross annual receipts to 2059.

2012-2021: $20,520,000 \times 25.94 = 532,228,800$
2021-2030: $532,228,800 \times 25.94 = 13,807,571,472$
2030-2039: $13,807,571,472 \times 25.94 = 358,168,403,983.68$

2039-2048: $358,168,403,983.68 \times 25.94 = 9290888399336.6592$
2048-2057: $9290888399336.6592 \times 25.94 = 241005645078792.939648$
2057-2059: 2 years equates to a multiplication factor of 1.16888. Therefore $1.16888 \times 241005645078792.939648 = 2,817,066,784,197,069.18729575424$

2. Alabama + Alaska + Arkansas + California + Colorado + Connecticut, Delaware + Florida + Georgia
\$ 15,965,236,454.22
(2013-2059)
Table 1.

The calculations commence in 2013 and use \$3.9 million as the starting point of annual revenue generation. This number is the amount Dr. Kaul' corporations generated in 2003 at a point when his reputation was significantly weaker than the level it had reached at the end of March 2012. Had the defendants acts not occurred then it is reasonable to conclude that based on his reputation the NJSR stateside expansion would have generated at least \$3.9 million after its first year of business. The multiplication by 5.26 is used to calculate the amount to 2058 with the 2059 value derived by factoring (multiplication and then addition) the relative value of one year's worth of 5.26 of the value calculated for 2058. The same technique has been used to calculate the amounts for all other states as below.

3. Hawaii + Indiana + Illinois + Iowa + Kansas + Kentucky + Louisiana + Maine + Maryland
\$ 19,248,221,135.00
(2014-2059)
Table 2.

4. Massachusetts + Minnesota + Michigan + Missouri + Montana + Nebraska + New Hampshire + New Mexico + Montana
\$ 742,028,019.48
(2015-2059)
Table 3.

5. Nevada + New York + North Carolina + North Dakota + Ohio + Oklahoma + Oregon + Pennsylvania + Rhode Island
\$ 64,931,491.08
(2016-2059)
Table 4

6. South Carolina + South Dakota + Tennessee + Texas + Utah + Vermont + Virginia + Washington + West Virginia
\$ 57,623,881.554
(2017-2059)
Table 5

7. Wisconsin + Wyoming + Indiana + Arizona
\$ 20,618,849.40
(2018-2059)
Table 6

The total monetary damage sustained for US clinical services for the period 2012-2059 is:

\$ 2,817,102,882,856,899.92129575424 million divided by 1,000,000,000

=

\$ 28,171,028.828568999213 trillion

Exhibit 4

Facts

The table below identifies the new evidence + new injuries that differentiate the Second Amended Complaint from Kaul v Heary:

<u>Evidence + Injuries</u>	Kaul v Heary: March 22, 2013	Original Complaint: February 22, 2016	FAC: June 8, 2016	Opinion of Judge McNulty: June 30 2017	SAC: June 4, 2018
<u>Injuries:</u>					
<u>Loss of Bernardsville residence (home of Kaul's children)</u>			May 2016		
<u>Loss of Manhattan residence</u>	April 2013-after				
<u>Loss of NJSR Surgical Center</u>	July, 2014				
<u>Loss of license for NJSR II Surgical Center</u>	December, 2014				
<u>Loss of reputation</u>	April 2, 2012				
<u>Suspension of medical license</u>	April 2, 2012				
<u>Revocation of medical license</u>	March 12, 2014				
<u>With-holding of \$45 million AR by insurance carriers</u>	June, 2012				
<u>Loss of CDS prescribing license</u>	May, 2012				
<u>Loss of DEA prescribing license</u>	2015				
<u>Denial of application for reinstatement of NJ license</u>	May, 2014				
<u>Denial of application for PA license</u>					July 25, 2018
<u>Arrest + imprisonment for unpaid child support</u>			September, 2016		
<u>State indictment for unpaid state taxes</u>		May 2016			

<u>Denial of banking services + reporting to www.checksystems.com for banking fraud</u>	September, 2013				
<u>Exclusion from Federal Health Care Programs</u>	January, 2016				
<u>Chapter 11 bankruptcy of Kaul's corporations</u>	June 17, 2013				
<u>Chapter 7 bankruptcy of Kaul's corporations</u>	July 21, 2014				
<u>Reporting of suspension to National Practitioner Data Bank</u>	April 10, 2012				
<u>Reporting of revocation to National Practitioner Data Bank</u>	February 12, 2014				
<u>Suspension of NJ driving license</u>	March 2015				
<u>Loss of car</u>	November 2015				
<u>Allstate v Kaul: UNN-L-322-15</u>	January 29, 2015				
<u>Allstate v Casatelli/Kaul: UNN-L-3322-12</u>	May, 2012				
<u>Sica v Kaul: UNN-L-7421-12</u>	October 5, 2012				
<u>Park v Kaul: BER-L-7116-14</u>	July 21, 2014				
<u>Santos v Kaul: BER-3322-15</u>	September 24, 2015				
<u>McLean v Kaul: ESX-L-802-14</u>	2014				
<u>Economou v Kaul: BER-L-8607-13</u>	June, 2013				
<u>Kaul v Kaul: FM: 18-254-06</u>	2014				
<u>Pinto v Kaul: ESX-L-8409-12</u>	November, 2012				
<u>Ernst v Kaul: OCN-L-2256-12</u>	August, 2012				
<u>Terry v Kaul: ESX-L-3614-12</u>	May, 2012				

<u>Zetterberg v Kaul: ESX-L-5451-12</u>	July 23, 2012				
<u>Reporting of suspension + revocation to Medicaid Fraud Division</u>	August 1, 2014				
Evidence:					
<u>'The Zerbini Certification': D.E. 204-10 Page ID 4214 to 4221</u>				August 21, 2017	
<u>'The Sabo Certification': D.E. 209-10 Page ID 4582 to 4584</u>				August 10, 2017	
<u>'The Solomon Critique': D.E. 225 Page ID 5271 to 5270</u>				January 17, 2018	
<u>'The Calabrese Certification': D.E.226 Page ID 5274 to 5275</u>				February 5, 2018	
<u>'The Przybylski Disciplinary Notice': 18-CV-08086 – D.E. 8-1</u>				May 21, 2018	
<u>'The Feldman Certification': 18-CV-08086 – D.E. 53</u>					September 27, 2018
<u>'Stolen by Stolz': Kaul v Stolz – Adversarial Action 18-01489 – Bankruptcy Case 13-23366</u>					September 20, 2018

The table below identifies the elements of: (i) federal RICO; (ii) state RICO; (iii) state conspiracy. Kaul did not plead a state RICO charge in Kaul v Heary, he pled conspiracy, and therefore respectfully asserts that the Court’s analogy of this charge to RICO is not quite accurate (D.E. 200 Page ID 3737). Kaul’s RICO claim has not been adjudicated in any state or federal court:

Federal RICO	New Jersey RICO: 2C:41-2(c)	Conspiracy Under State Law
culpable person who	culpable person who	defendant
willfully or knowingly	willfully or knowingly	
commits or conspires to the commission of “racketeering activity”	commits or conspires to the commission of “racketeering activity”	(1) entered into an agreement with at least one other

Exhibit 5

Corruption in the United States

Corruption in the United States is the act of government officials abusing their political powers for private gain, typically through bribery or other methods.

Corruption in the United States is a growing problem across many areas, particularly in the political spectrum. In 2020, Transparency International ranked the United States as the 25th least corrupt country (of 180 countries ranked),^[1] falling from 18th since 2016.^[2] This ranking places the United States between Bhutan (24) and Chile (26) on corrupt practices in government and other institutions. In 2019, Transparency International stated that the United States is "experiencing threats to its system of checks and balances", along with an "erosion of ethical norms at the highest levels of power".^[3]

Contents

US topics related to corruption

Convictions of government officials

Scandals and crimes

See also

References

Further reading

External links

US topics related to corruption

- American Anti-Corruption Act
- Campaign finance in the United States
- Gerrymandering in the United States
- + ▪ Health care in the United States →
- Iron triangle (US politics)
- Lobbying in the United States
- Military budget of the United States
- Military-industrial complex
- Operation Ill Wind
- Police corruption in New York City
- Prison-industrial complex
- RepresentUs
- Vote early and vote often
- Voter suppression in the United States

Convictions of government officials

- [List of United States federal officials convicted of corruption offenses](#)
- [List of United States state officials convicted of federal corruption offenses](#)
- [List of United States local officials convicted of federal corruption offenses](#)

Scandals and crimes

- [List of federal political scandals in the United States](#)
- [List of federal political sex scandals in the United States](#)
- [List of American federal politicians convicted of crimes](#)
- [Political scandals in the United States by state or territory](#)
- [State and local political sex scandals in the United States](#)
- [List of American state and local politicians convicted of crimes](#)
- [Corruption in the US federal judiciary](#). See the section "In the USA" and subsection "Notable judges involved in misconduct allegations" in [Judicial misconduct](#).

See also

- [Political corruption](#)
- [Crime in the United States](#)

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1. "Corruption Perceptions Index 2020" (<https://www.transparency.org/en/cpi>). *transparency.org*. Corruption Perception Index. Retrieved January 28, 2020.
2. "Corruption Perceptions Index 2016" (http://www.transparency.org/news/feature/corruption_perception_index_2016). Transparency International. January 25, 2017. Retrieved April 10, 2017.
3. "Americas: Weakening Democracy and Rise in Populism Hinder Anti-corruption Efforts" (<https://www.transparency.org/news/feature/cpi-2018-regional-analysis-americas>). Transparency International. January 29, 2019. Retrieved February 24, 2019.

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- Teachout, Zephyr. *Corruption in America: From Benjamin Franklin's Snuff Box to Citizens United* (<https://books.google.com/books?id=dctwBAAAQBAJ&printsec=frontcover#v=onepage&q&f=false>) (Harvard University Press, 2014)

External links

- [United States](https://web.archive.org/web/20140325071555/http://www.business-anti-corruption.com/country-profiles/the-americas/united-states-of-america/snapshot.aspx) (<https://web.archive.org/web/20140325071555/http://www.business-anti-corruption.com/country-profiles/the-americas/united-states-of-america/snapshot.aspx>) at the Business Anti-Corruption Portal
- [United States](https://www.transparency.org/country/USA) (<https://www.transparency.org/country/USA>) at Transparency International

- United States (http://www.transparency.org/gcb2013/country/?country=united_states) at the Global Corruption Barometer
- Cole, Juan (December 3, 2013). "Top 10 Ways the US is the Most Corrupt Country in the World" (<https://www.juancole.com/2013/12/corrupt-country-world.html>). *Informed Comment*. Archived (<https://web.archive.org/web/20171129205737/https://www.juancole.com/2013/12/corrupt-country-world.html>) from the original on November 29, 2017. Retrieved May 7, 2017.

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ENERGY



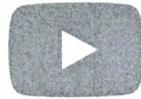
Top 10 Ways the US is the Most Corrupt Country in the World

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VOA reports :

Somalia, North Korea, Afghanistan Head List Of Corr...



While it is true that you don't typically have to bribe your postman to deliver the mail in the US, in many key ways America's political and financial practices make it in absolute terms far more corrupt than the usual global South suspects. After all, the US economy is worth over \$16 trillion a year, so in our corruption a lot more money changes hands.

1. Instead of having short, publicly-funded political campaigns with limited and/or free advertising (as a number of Western European countries do), the US has long political campaigns in which candidates are dunned big bucks for advertising. They are therefore forced to

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forced into it by the system. House Majority leader John Boehner has actually just handed out cash on the floor of the House from the tobacco industry to other representatives.

When French President Nicolas Sarkozy was defeated in 2012, soon thereafter French police actually went into his private residence searching for an alleged \$50,000 in illicit campaign contributions from the L'Oreale heiress. I thought to myself, seriously? \$50,000 in a presidential campaign? Our presidential campaigns cost a billion dollars each! \$50,000 is a rounding error, not a basis for police action. Why, George W. Bush took millions from arms manufacturers and then ginned up a war for them, and the police haven't been anywhere near his house.

American politicians don't represent "the people." With a few honorable exceptions, they represent the the 1%. American democracy is being corrupted out of existence.

2. That politicians can be bribed to reduce regulation of industries like banking (what is called "regulatory capture") means that they will be so bribed. Billions were spent and 3,000 lobbyists employed by bankers to remove cumbersome rules in the zeroes. Thus, political corruption enabled financial corruption (in some cases

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the poor Afghans can't just legislate their corruption out of existence by regularizing it, the way Wall street did.

3. That the chief villains of the 2008 meltdown (from which 90% of Americans have not recovered) have not been prosecuted is itself a form of corruption.

4. The US military budget is bloated and enormous, bigger than the military budgets of the next twelve major states. What isn't usually realized is that perhaps half of it is spent on outsourced services, not on the military. It is corporate welfare on a cosmic scale. I've seen with my own eyes how officers in the military get out and then form companies to sell things to their former colleagues still on the inside.

5. The US has a vast gulag of 2.2 million prisoners in jail and penitentiary. There is an increasing tendency for prisons to be privatized, and this tendency is corrupting the system. It is wrong for people to profit from putting and keeping human beings behind bars. This troubling trend is made all the more troubling by the move to give extra-long sentences for minor crimes, to deny parole and to imprison people for life for e.g, three small thefts.

6. The rich are well placed to bribe our politicians to reduce taxes on the rich. This and other government

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hasn't been seen in the US since the age of the robber barons in the nineteenth century. Both eras are marked by extreme corruption.

7. The National Security Agency's domestic spying is a form of corruption in itself, and lends itself to corruption. With some 4 million government employees and private contractors engaged in this surveillance, it is highly unlikely that various forms of insider trading and other corrupt practices are not being committed. If you knew who Warren Buffett and George Soros were calling every day, that alone could make you a killing. The American political class wouldn't be defending this indefensible invasion of citizens' privacy so vigorously if someone somewhere weren't making money on it.

8. As for insider trading, it turns out Congress undid much of the law it hastily passed forbidding members, rather belatedly, to engage in insider trading (buying and selling stock based on their privileged knowledge of future government policy). That this practice only became an issue recently is another sign of how corrupt the system is.

9. Asset forfeiture in the 'drug war' is corrupting police departments and the judiciary.

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causing global warming. Fox Cable News is among the more corrupt institutions in American society, purveying outright lies for the benefit of the billionaire class. The US is so corrupt that it is resisting the obvious urgency to slash carbon production. Even our relatively progressive president talks about exploiting all sources of energy, as though hydrocarbons were just as valuable as green energy and as though hydrocarbons weren't poisoning the earth.

Even Qatar, its economy based on natural gas, freely admits the challenge of human-induced climate change. American politicians like Jim Inhofe are openly ridiculed when they travel to Europe for their know-nothingism on climate.

So don't tell the Philippines or the other victims of American corruption how corrupt they are for taking a few petty bribes. Americans are not seen as corrupt because we only deal in the big denominations. Steal \$2 trillion and you aren't corrupt, you're respectable.